

DEIS Public Comment Response Matrix

#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
1	Kelly Roberts	Regarding Appendix D and the inevitable adoption of replacement vehicles for the transit fleet, it seems (based on what information I have studied so far) that biofuel vehicles will be the best type in which to invest. Given the various types of organic 2 matter, including the various types of waste, that can be used for biofuel production, this sounds the most cost-efficient and environmentally friendly pathway to take for our transportation system. Plus, with all of the waste that is released by the Navy in our waters, can we partner with them to reroute it to a more honorable processing system so that our marine life can be healthy/er?	Comment received. The discussion of the Kitsap Transit's fleet electrification plans is included in Kitsap Transit's long-range plan. Please refer to that document for further details on KT's plans to reduce GHG emission. Please note that Kitsap Transit is a separate public agency and not under the direct administration of Kitsap County government.	Comment form	3.2.6, Appendix D
2	Thomas Garrett	Zoning Changes Map - Alternative 3 Zoning Changes - All Parcel Owners 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 unnecessary damage to the Park. Only Kitsap County designated access roads/trails will be used for all park visitors.	Thank you for your comment. Additional detail on the Port Gamble Heritage Park will be included in the Final EIS.	Comment form	2.4.3, 3.3.4
3	Thomas Garrett	1.2 SEPA Environmental Review - In the event of a conflict with Kitsap County Regulations/Policies/Best Available Science and the governing WA State Agency Regulations/Policies/Best Available Science (BAS), the WA State Agency Regulations/Policies/BAS shall apply.	Noted. Thank you for your comment. More detail on Best Available Science and guidance from WA state agencies will be included in 1.2 in the final EIS.	Comment form	1.2
4	Thomas Garrett	1.4 Section Major Issues, Significant Areas of Controversy & Uncertainty & Issues to Be Resolved Define Level cost estimates for capital improvements shall be made available to the public prior to approval by Kitsap County. If the cost estimates exceed a level not acceptable to the public, it shall go to the public for vote. Project Define level estimates shall be made publicly available prior to a project Execute phase.	Cost estimates for capital improvements are included in the Capital Facilities Plan, and detailed cost estimates for individual improvements are made public to the public prior to project approval by the County.	Comment form	1.4
5	Thomas Garrett	1.5 SUMMARY TABLES OF IMPACTS & MITIGATION MEASURES Exhibit 1.5-1 Earth (Section 3.1.1) Impacts Common to all Alternatives add "regulations of Federal, State and Kitsap County regulations and codes"	DCG/Watershed Federal, state, and local regulations and codes are existing (or proposed) mitigation for impacts to earth resources, not impacts.	Comment form	1.5
6	Thomas Garrett	Exhibits 1.5-1 through 1.5-4 All Sections with "Significant Unavoidable Adverse Impacts" - Kitsap County should require any major developer/parcel owners to have a legally binding incorporated and bonded Owners Association (OA) to oversee and ensure compliance with State and County Codes/Regulations in the Critical and Sensitive areas. The developer/parcel owners will furnish a detailed project schedule and detailed work 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. This should also apply to parcels owners bordering on or adjacent to major Kitsap County Parks.	Thank you for your recommendation. Your feedback will be forwarded to County decision makers.	Comment form	1.5
7	Thomas Garrett	2 Alternatives Exhibit 2.3-1 Kitsap County Planning Jurisdictions Map This map should be modified to indicate all streams and provide a link to the interactive map with streams.	Thank you for your comment. The exhibit clarity with regard to streams will be improved in the Final EIS.	Comment form	2.3
8	Thomas Garrett	2.5.7 Capital Facilities Plan Where the Alternative 3 "Dispersed Growth Focus" where the infrastructure/capital facilities only benefits the developer/parcel owner, consider having them pay the cost.	The comment is noted and forwarded to County decision makers.	Comment form	2.5.7
9	Thomas Garrett	3 Affected Environment, Significant Impacts & Mitigation Measures Exhibit 3.1.1-1 Kitsap County Soil Survey Map This map should be modified to indicate all streams and provide a link to the interactive map with streams and intermittent streams.	The comment is noted. Some maps may be improved in the Final EIS for usability. For maps that do not include the requested information, the County can provide a link to an interactive GIS map or parcel viewer that includes various layers including the stream layer.	Comment form	3.1.1
10	Thomas Garrett	Exhibit 3.1.1.1-2 Geologically Hazardous Map – Erosion hazards This map should be modified to indicate all streams and provide a link to the interactive map with streams and intermittent streams.	The comment is noted. Some maps may be improved in the Final EIS for usability. For maps that do not include the requested information, the County can provide a link to an interactive GIS map or parcel viewer that includes various layers including the stream layer.	Comment form	3.1.1
11	Thomas Garrett	Exhibit 3.1.1.1-3 Geologically Hazardous Map – Landslide hazards This map should be modified to indicate all streams and provide a link to the interactive map with streams and intermittent streams.	The comment is noted. Some maps may be improved in the Final EIS for usability. For maps that do not include the requested information, the County can provide a link to an interactive GIS map or parcel viewer that includes various layers including the stream layer.	Comment form	3.1.1
12	Thomas Garrett	Exhibit 3.1.1.1-4 Geologically Hazardous Map – Seismic hazards This map should be modified to indicate all streams and provide a link to the interactive map with streams and intermittent streams.	A link to the interactive map will be included in the Final EIS.	Comment form	3.1.1
13	Thomas Garrett	Exhibit 3.1.3.1-1 Watercourse and surface water map This map should be provided with a link to the interactive map.	The comment is noted. Some maps may be improved in the Final EIS for usability. For maps that do not include the requested information, the County can provide a link to an interactive GIS map or parcel viewer that includes various layers including the stream layer.	Comment form	3.1.3
14	Thomas Garrett	Exhibit 3.1.3.1-5 Critical Areas Map This map should be modified to indicate all stream sand intermittent streams and provide a link to the interactive map with streams and intermittent streams.	The comment is noted. Some maps may be improved in the Final EIS for usability. For maps that do not include the requested information, the County can provide a link to an interactive GIS map or parcel viewer that includes various layers including the stream layer.	Comment form	3.1.3
15	Thomas Garrett	Exhibit 3.2.1.1-2 North Kitsap Land Use Map This map should be modified to indicate all streams and intermittent streams and provide a link to the interactive map with streams and intermittent streams.	The comment is noted. Some maps may be improved in the Final EIS for usability. For maps that do not include the requested information, the County can provide a link to an interactive GIS map or parcel viewer that includes various layers including the stream layer.	Comment form	3.2.1
16	Thomas Garrett	Exhibit 3.2.1.1-3 Central Kitsap Land Use Map This map should be modified to indicate all streams and intermittent streams and provide a link to the interactive map with streams and intermittent streams.	The comment is noted. Some maps may be improved in the Final EIS for usability. For maps that do not include the requested information, the County can provide a link to an interactive GIS map or parcel viewer that includes various layers including the stream layer.	Comment form	3.2.1
17	Thomas Garrett	Exhibit 3.2.1.1-4 South Kitsap Land Use Map This map should be modified to indicate all streams and provide a link to the interactive map with streams.	The comment is noted. Some maps may be improved in the Final EIS for usability. For maps that do not include the requested information, the County can provide a link to an interactive GIS map or parcel viewer that includes various layers including the stream layer.	Comment form	3.2.1
18	Thomas Garrett	Exhibit 3.2.1.1-5 Zoning & Development Standards Kitsap County should provide a hyperlink to the Title 17 Zoning https://www.codepublishing.com/WA/KitsapCounty/#!/Kitsap17/Kitsap17.html	Thank you for the comment. A hyperlink to Title 17 will be included in the Final EIS.	Comment form	3.2.1

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19	Thomas Garrett	Exhibit 3.2.1.1-6 North Kitsap Zoning Map This map should be modified to indicate all streams and provide a link to the interactive map with streams including seasonal intermittent streams.	The comment is noted. Some maps may be improved in the Final EIS for usability. For maps that do not include the requested information, the County can provide a link to an interactive GIS map or parcel viewer that includes various layers including the stream layer.	Comment form	3.2.1
20	Thomas Garrett	Exhibit 3.2.1.1-7 Central Kitsap Zoning Map This map should be modified to indicate all streams and provide a link to the interactive map with streams including seasonal intermittent streams.	The comment is noted. Some maps may be improved in the Final EIS for usability. For maps that do not include the requested information, the County can provide a link to an interactive GIS map or parcel viewer that includes various layers including the stream layer.	Comment form	3.2.1
21	Thomas Garrett	Exhibit 3.2.1.1-8 South Kitsap Zoning Map This map should be modified to indicate all streams and provide a link to the interactive map with streams including seasonal intermittent streams.	The comment is noted. Some maps may be improved in the Final EIS for usability. For maps that do not include the requested information, the County can provide a link to an interactive GIS map or parcel viewer that includes various layers including the stream layer.	Comment form	3.2.1
22	Jess Chandler	Hello, In the Draft Comprehensive Plan EIS p. 3-140 [referring to pedestrians] says, "The roadway inventory (linked on the county website at www.kcowa.us/compplan) identifies the sidewalks and shoulders currently present along county roads. There is a Roadway Inventory by Alternative linked as a Reference Document on the Comprehensive Plan site here: (https://www.kitsapgov.com/dcd/PEP%20Documents/121423_Roadway%20Inventory%20Data%20By%20Alternative.pdf). However, this is a PDF of a table that does not contain any Road Names or Road Log Ids that match to the county's public road data. It also has column names that are not explained. This inventory is not something that we can consume to identify sidewalks and shoulders currently present along county roads in a meaningful way never mind how they would be changed in each alternative. I am looking for a version of this that can be somehow related to our roads. Please advise how I can obtain that data with Road Log Ids and Segment Ids or geometry. Thank you. Best, Jess	Kitsap County staff have provided data as requested. The final EIS will also provide an updated road-log that includes roadway names as part of the model file outputs.	Email	3.2.6
23	John Willett	Comment/request on rezone request by Jon Rose for Raydient 400 acres off Bond and Stottlemeyer Roads in North Kitsap. I see that Jon Rose has applied for a rezone in the new proposed Kitsap comp plan on the 20/ 20 acre lots (rezone Rose says would mean 80+ residual lots) in that 400 acres from rural wooded to rural residential and one 24 acre piece off Stottlemeyer from rural wooded to rural commercial (YMCA). I personally would be against these rezones, as it does not comply with the GMA and I believe it 2 would be more beneficial for the citizens of Kitsap to keep this 400 acres rural wooded. Also, I see the YMCA need in the North, but the location should be in Poulsbo City limits where access and population are best suited for such a development, There does not need to be a rezone for ball fields, from what Rose said, so that would not preclude making the ball fields on these 400 acres, which the North badly needs . I have suggested before at two meetings and some emails to officials, so far, that for this YMCA here in the North, officials should develop a partnership with the City of Poulsbo, WWU/OCC and the YMCA to build said needed YMCA/Rec Center in College Market Place where Poulsbo is already moving on a Rec Center there, not on Raydient/Raynior land on Stottlemeyer. My suggestion is to buy this 400 acres from Raydient, like the KFBC/P did for the Port Gamble Heritage Park a few years ago, and put this 400 acres in the PGHP and owned by Kitsap Parks, who then partner with Kingston Rotary and the North's citizen groups to build and maintain the needed ball fields and also restore the forest in these 400 acres. As what happened with the PGHP purchase, Jon Rose (Raydient) made money on that deal without all the expenses and hassles of residential development and citizens who will fight what they see as unwise development, In closing; and the community got a very special place for recreation and conservation, and Raydient comes out smelling like a ROSE! Win Win!	Thank you for the comment. Your feedback on the rezone will be forwarded to County decision makers.	Comment form	?
24	Nan Mader	Thank you for the informative zoom session 1/11/2024 In our break up session with Eric I posed a couple couple questions one of them being good. The comp plan gives very specific information on housing unit numbers and people unit numbers and employment numbers however, there's a little data regarding available land units to put all these people that are planned to be moved 2 into Kitsap county other than Silverdale. And while I see, there is open space, particularly in what was the Silverdale mall becoming more residential there's little area otherwise open space for growth in the county.	Thank you for your comment. The completed Land Capacity Analysis and land use changes in each alternative show where growth will be accommodated, which includes growth across most Urban Growth Areas, including Silverdale. Please note that housing targets are reached only in Alternative 2.	Comment form	?
25	Nan Mader	My other question was with respect to our water, quality and availability with this increased gross and also air quality with increased traffic. I posed a question to Eric About vehicle usage in increased density. Specifically is there any evidence in the country where density has been forcibly increased greatly that people actually move to mass transit rather than continuing with single use automobiles.	Note: Section 3.1.2, subheading 'Vehicle Travel & Vehicle Emission Forecasts by Puget Sound Regional Council' (PSRC), notes the Vehicle Miles Traveled (VMT) reductions are based on the PSRC Regional Transportation Plan (RTP). See research by Todd Littman www.vtapi.org , findings support greater transit and non-motorized usage, as well as better travel times, in high density areas where these services are provided.	Comment form	3.1.2, 3.1.3, 3.2.6
26	Nan Mader	And finally in that, I am responsible as trustee for 30 acres of Forrest and farm area, I'm concerned about losing the tax break on the portion of his property that fits the designation. Eric responded that was not in the plan to be changed for the near future. I hope that remains true. Thanks again for the zoom meeting. I'm looking forward to the next one. Thanks Nan Mader.	The comment is noted and forwarded to County decision makers.	Comment form	2

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27	Rebecca Erickson, Mayor (Poulsbo)	November 6, 2023 Department of Community Development Planning and Environmental Programs 614 Division St. MS-36 Port Orchard, WA 98366 Email: compplan@kitsap.gov Subject: EIS Alternative, City of Poulsbo Opposition to Alternative 3 rezone request Dear Kitsap County Board of County Commissioners: I am writing on behalf of the Poulsbo City Council to express our strong opposition to the rezoning application submitted by Jon Rose (aka Raydient) for the vacant, 413.9 acres located off of and north of Bond Road, which seeks to change the zoning designation from Rural Wooded (RW) to Rural Residential (RR) (aka Reclassification Request #72). We understand that this request has been included in the Alternative 3 "Dispersed Growth Focus" land use alternative of the 2024 Comprehensive Plan. The Growth Management Act was enacted to promote responsible and sustainable growth within city limits and urban growth areas (UGAs) and to preserve rural areas for agriculture, open space, and other valuable purposes. Upzoning land outside of UGAs runs counter to the fundamental purpose of the GMA and undermines the careful planning and thoughtful development that the Act seeks to achieve. The rezoning would result in an increase of at least 60 units by increasing the density from one (1) unit for every 20 acres (20 units) to one (1) unit per every five (5) acres (82 units). We have several concerns regarding this application: 1. Environmental Impact: The area currently designated as Rural Wooded (RW) contains valuable natural habitats and forested areas that play a crucial role in maintaining the ecological balance of our region. The approximate 414 acres has multiple watercourses designated by DNR and the Wildfish Conservancy that includes fish bearing streams, nonfish bearing streams, as well as unknown, unmodeled hydrographic features. Moderate landslides and erosion hazard occur as well as a mapped wetland. Furthermore, the Port Gamble S'Klallam tribe submitted a comment (April 6, 2023) against this requested siting that it is within the Gamble Creek Watershed that feeds directly into the Port Gamble Bay. They are concerned that the watershed will be directly impacted by any development, but most intensely impacted with Rural Residential development. Changing the zoning to Rural Residential could lead to increased deforestation, habitat disruption, and environmental stress.	Thank you for your feedback. Your comments on the rezoning will be shared with County decision makers.	Letter	3.1
28	Rebecca Erickson, Mayor (Poulsbo)	2. Traffic and Infrastructure: Bond Road is already a heavily trafficked route, and the proposed rezoning will result in increased traffic congestion, putting additional strain on our infrastructure. We are concerned about the adequacy of infrastructure and roadways to support the proposed development. The project will have significant impact on the LOS for major intersections on Bond and must be addressed.	Note: Exhibit 3.2.6.1-6, Bond Road is not shown as deficient under existing conditions, or under Alternative 1, 2 or 3 conditions as shown in Exhibits 3.2.6.2-4, 3.2.6.2-5, 3.2.6.2-6 respectively. Any future EIS work in this area would need to be considered on a separate basis. Bond Road is a state route that falls under the jurisdiction of WSDOT.	Letter	3.2.6
29	Rebecca Erickson, Mayor (Poulsbo)	3. Inconsistent with the Purpose of the R zone: The purpose of the RW zone is 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. The purpose of the RR zone is to promote low-density residential development and agricultural activities that are consistent with rural character. It is applied to areas that are relatively unconstrained by environmentally sensitive areas or other significant landscape features. These areas are provided with limited public services. The properties do not appear to meet the purpose of the RR zone as they are relatively constrained by environmentally sensitive areas. As stated, the site is largely covered in moderate geological hazard slopes and contains fish and non-fish habitat streams as well as a mapped wetland and hydric soils. It is also within the Gamble Creek Watershed that feeds directly into the Port Gamble Bay.	Thank you for your feedback. Your comments on the rezoning will be shared with County decision makers.	Letter	2
30	Rebecca Erickson, Mayor (Poulsbo)	4. Community Character and Increased Demand for Services: The proposed area abuts Port Gamble Heritage Park (Park zone) to the west and Rural Protection zoned areas to the east. An increase in density from one unit per 20 acres to one unit per 5 acres would be a dramatic increase immediately abutting a Park zone and is inconsistent with the existing zoning pattern. Additionally, and as stated in the comment letter from the Suquamish Tribe dated April 14, 2023, increasing rural housing densities will also increase the need for school, libraries, churches, transit, road maintenance, available commercial and retail opportunities as well as other public amenities. The densification projects require urban services and the extension of services to projects located in the rural areas and is not only expensive but contrary to the GMA. Given these concerns, we respectfully request that the Kitsap County Board of County Commissioners carefully consider the implications of this rezoning application on the environment, traffic, and the character of our community. We appreciate your attention to this matter and urge you to consider the impacts to the residents of Poulsbo and the surrounding natural and manmade environment. Thank you for your time and consideration. Rebecca Erickson, Mayor Signed with unanimous support from the Poulsbo City Council as approved at the November 1, 2023, Poulsbo Council Meeting.	Thank you for your feedback. Your comments on the rezoning will be shared with County decision makers.	Letter	2.4, multiple
31	Jess Chandler	The transportation section of the Comprehensive Plan Draft EIS mentions multi-modal transportation but does not show any analysis of how non-vehicle transportation impact the LOS and community development. This comment is focused on the lack of real analysis of the public transit options in the draft EIS and Appendix D. -Appendix D of the Comprehensive Plan Draft EIS: Kitsap Transit Planning Context and Trends Analysis does not provide any trends analysis or 2 planning context. This shows the service that exists on routed busses and ferries. -On p. 3-33 of the EIS - under discussion of the Regional Transportation Plan - says 'Expanding transit and travel choices' as one of the key challenges and opportunities -On p. 3-45 of the EIS we have 'Increased transit service in the locations mentioned above is intended to help areas meet PSRC's centers criteria and is consistent with policies looking to increase transit-oriented communities.' - In definitions of kinds of communities for VISION 2050 on p. 3-30 and 3-31, Bainbridge Island, Port Orchard and its UGA, Poulsbo and its UGA, and Kingston are called out as High-Capacity Transit Communities. - Quite a bit of the current context for transit is provided in the transit section of chapter 3, pp. 3- 132:137. Which describes the routes that exist and shows a map. However, in no part of the Transportation Chapter of the draft EIS nor in Appendix D is any attention given to what would have to change about Kitsap Transit operation in order to support Alternative 2 or to achieve significant VMT reduction. There is no policy shown that will achieve these things. We have words that say that we will have transit oriented development and that we will need to rely on transit more, but we do not acknowledge what a lift that might be. How much will it cost? How do we choose to quantify the costs and benefits? If we continue to do what we've always done, we will keep what we have had before - and that is not consistent with the stated goals of this comprehensive plan. As such, for transit, I think that we need to provide better clarity on the following points: 1. What is the current access to transit? The route map is not the same thing as considering access - some of those routes only run as commuters (as shown in the table in appendix d) going past areas where they don't have stops. 2. What is the current ridership and trends in ridership for certain routes? (And associate causal analysis, if possible) 3. What are alternative transit access routes that can be considered that would achieve our transit and VMT goals? 3 4 and so on will be identifying how to get from 1 and 2 to a preferred alternative transit plan from 3 - capital facilities/Human Resources/ etc.	A transit-specific analysis aimed at evaluating current and future needs per alternative is beyond the scope of a document of this nature. The Kitsap Transit 2022 Long Range Plan identifies additional transit routes, on-demand service areas, micro-transit, and high-capacity transit improvements. The model currently does not have reduced trip generation rates in more densely populated TAZs. This level of trip generation analysis would be included in future development review. The specificity of this level of analysis is too granular for a countywide twenty-year transportation study.	Comment form	3.2.6, Appendix D

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32	Jess Chandler	This comment is on p. 3-149 of the Draft Comprehensive Plan Environmental Impact Statement EIS. The Exhibit 3.2.6.2-2 Summary of Countywide Travel Statistics has Countywide Employment numbers 2021](https://www.kitsapgov.com/dcd/PEP%20Documents/121423_Final%20Ratified%20Kitsap%20Countywide%In this exhibit, the Countywide Population in 2044, under all alternatives, is set to 346,358 - which is the However, in this exhibit, the Countywide Employment in 2020 is set to 195,754 under all alternatives under Alt 3. In the CPP 2021, Appendix B-2, the Employment Distribution through 2044 shows The employment in 2020 as 114,860 and the target in 2044 is given as 160,883. 2 It is not clear to me what kinds of errors having the employment numbers incorrect will do to the model, employment assumptions are highly correlated to the vehicle miles travel demanded. Please correct and	There was an error in the countywide population numbers, which have been addressed.	Comment form	3.2.6
33	Coleen Shoudy	I am writing in opposition of Alt 3 to support keeping the 95 acres of the old Crista Camp and Courter's property from being zoned Urban low and included in the Silverdale UGA for the following reasons: 1. There is enough capacity for homes in Alt 2 without rezoning the 95 acres currently Rural to Urban Low. The GMA states that it should not 2 rezone Rural lands if adequate housing needs are met in the existing UGA. 2. The 95 acres is heavily wooded, on steep terrain, adjacent to Island Lake and Barker Creek and over Critical 1 Aquifer. If rezoned, the forest would be clearcut, steep slopes denuded and runoff would clearly be unavoidable into the creek and lake, causing damage to the ecosystem. 3. It is difficult to separate the 55 acre Meadowview development from the 75 acres of rural land as the development of Meadowview with 329 homes, has proposed plans to cross Barker Creek, with a narrow road exit to Lakeview Rd to Central Valley. The country roads to exit these properties are inadequate per the fire Marshall to adequately handle the traffic exiting to the East. Crossing the Creek with a road should not be allowed. 4. An Environmental Impact Study should be required on this entire 145 acres of heavily wooded, sloped property with a fish creek, lake, seasonal creek and abundant wildlife. The property should not be allowed to be clearcut nor reduced setbacks from code to the creek and lake. Tree retention should be included as well as green belts. 5. Concerns with the sewer pump station and retention ponds next to the creek and lake for inevitable spills and runoff. 6. The critical 1 Island Lake Aquifer needs to be protected from contamination and overuse. At the minimum Silverdale Water's study should be completed and reviewed before any approvals are made to increase zoning and EIS should be required. 7. Precedence for continued Urban sprawl in Central Valley if the 95 proposed rezone is allowed is a real concern, losing the rural feel of the valley along with loss of farmland and animal corridors. 8. Climate change is offset by trees and reduced carbon emissions from cars. Keeping growth in the proposed Alt 2 Silverdale UGA seems to be the best for the environment, affordable housing and transportation needs. In closing, my hope is to keep the aquifer, lake and creek healthy and available for all to enjoy for years to come. Once damage is done it cannot be undone so I am hoping the County Commissioners will vote to keep the 95 acre parcel rural. Thank you, Coleen and Mike Shoudy	Thank you for your feedback. Your comments on the Alternative 3 land use change will be shared with County decision makers.	Comment form	2
34	Beth Berglund	On page 3-74 there is a typo "West Sound Partners for Ecosystem Recover" is missing the "y".	Thank you, this typo will be corrected in the FEIS.	Comment form	3.2.3
35	Beth Berglund	On page 3-212 the name of the PG heritage park needs to be corrected. Instead of "Port Gamble Heritage Park" it should be "Port Gamble Forest Heritage Park" in the reference to the framework document. I wasn't able to find the framework 2 document itself and that should be available to the public.	Thank you, this typo will be corrected in the FEIS.	Comment form	3.3.4
36	Dave Shorett	Kitsap County updated Comprehensive Plan Comments on Draft Environmental Statement Dave Shorett 206-200-3433 1. It is clear that under any standard applied, GMA, RCWs, PRC 2050, Kitsap County Code and all planning codes applicable, Alternative 2 is legally supportable in contrast to Alternatives 1 and 3. There are so many references in the EIS that overwhelmingly support Alt. 2 and the Alt 2 map as preferred over Alt 1 and Alt 3 map that it would take pages and pages to highlight them. What stands as a basic summary is well presented in the tables beginning at p. 203.	The comment is noted and forwarded to County decision makers.	Letter	2
37	Dave Shorett	2. Given the central mandates of the GMA - concentrate growth in UGAs, avoid sprawl and avoid unneeded negative environmental impacts whenever possible, rezones are unnecessary in this 2024 version of the Comp. Plan. More than sufficient capacity for population growth exists in Alternative 2 and the EIS, as stated, provides no support for adding land to existing UGAs. In fact, this EIS states "• For UGAs that show capacities greater than the population or employment targets, UGA boundaries should be decreased, where possible. Areas should be removed that are more costly to provide public services or that have significant concentrations of critical areas . ." Rezones can wait until needed. The Comp. Plan and Kitsap Code allow for adjustments to zoning as needs are demonstrated beyond the date of a new comp plan - if it becomes apparent that capacity for population growth figures set in 2024 is not being met in the following years, there are several opportunities available to the County to make rezoning adjustments as needed. Moreover, those who have submitted applications for rezones in this Comp Plan can ask for rezones at any time in the future. The Kitsap Code provides a specific means of doing so. Additionally, the 5 year review of the Comp Plan presents another specific opportunity for consideration.	Thank you for your comments. Your feedback will be forwarded to County decision makers. Please note that Alternative 2 also includes rezones as well as limited expansion of urban growth areas. Growth to at least partially accommodate population and employment targets are distributed among UGAs in the alternatives, and capacity includes a market factor as allowed by the GMA.	Letter	2
38	Dave Shorett	3. Need to incentivize development in UGAs but not outside UGAs. It has been occasionally contended that developers must be incentivized to build in UGAs. This is reasonable and is or should be a goal of Kitsap County and DCD. However it has been suggested that adding rural zoned land to UGAs would be another way of incentivizing builders. This idea makes no sense, as zoning then becomes driven by developer's needs, rather than public interest; rural zones would lose much of the protection they now have; as for-profit operations, developers seek to maximize profit and that generally means constructing large single family homes priced out of the presently desired range set by recent legislation. The only conceivable exception might be parcels which would have little or no impact from urban development due to location, adjacent to Highway 303 for example and negligible impact on condition of the land.	Thank you for your comment. The Alternatives presented in the DEIS, especially Alternative 2, include proposed code changes and programs that incentivize development within UGAs.	Letter	2
39	Dave Shorett	4. As to specific proposed rezones in Alt 3, the 95 acre proposed rezone bordering Barker Creek and Island lake stands as an example of land which should never be rezoned to urban growth unless absolutely necessary to meet population growth projected for Kitsap County. This specific developer generated rezone proposal stands out as an example of what should only be a last resort to meet GMA population needs. It borders a salmon bearing stream and a Lake, is heavily forested, virtually undeveloped, provides excellent habitat, is not served by urban infrastructure, includes several CAO areas, including stream, wetland and a Category 1 CARA. Much more can be added as reasons this proposal must be rejected. It would be an abuse of discretion to add it to any type of UGA or up zone it in any manner. Additionally, the EIS states "The Comprehensive Plan is the centerpiece of planning for unincorporated Kitsap County. It expresses the community's vision of itself and the community it aspires to become." The community has weighed in on the proposal to rezone 95 acres at Island Lake and Barker Creek and overwhelmingly opposes this proposal.	Thank you for your feedback. Your comments on the proposed rezone will be forwarded to County decision makers.	Letter	2
40	Dave Shorett	5. I could not find any assessment using the standard of "no net loss," applicable to planning under WAC 365-196-830, Protection of critical areas. Reference in the EIS to stream and lake impact from Alt 3 do not appear to use this standard. Specifically, Island Lake and Barker Creek are mentioned several times in this EIS, apparently without reference to how no net loss would factor into a proposed rezone in Alt 3, mentioned above.	No net loss should be addressed. WAC 365-190-080 (1) references 'no net loss': <i>Counties and cities must protect critical areas. Counties and cities required or opting to plan under the act must consider the definitions and guidelines in this chapter when designating critical areas and when preparing development regulations that protect all functions and values of critical areas to ensure no net loss of ecological functions and values.</i>	Letter	3.1

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41	Dave Shorett	6. There is a significant understatement of adverse environmental impacts from development. The actual significant environmental impact of development is inescapably understated because the EIS has not included assessment of permitting, monitoring, actual on the ground development and enforcement processes in the county. Despite a few scattered references to codes being sometimes ineffective, the EIS essentially assumes that the processes involved in development are successful in meeting statutory and code adherence to protection of the environment in development. This assumption, made without an examination of the actual processes and their history, is arguably a significant flaw in the EIS. It is suggested that such studies be required to accurately assess actual probable impacts. The historical performance of the developers, Kitsap County government and its city governments in carrying out their respective obligations under applicable code must be known before making a fair environmental assessment of a comprehensive plan. The actual process of development includes an application for development supported by paid expert opinion which generally suggests no adverse impact or that impacts will be eliminated by regulatory mitigation or prevention measures taken by the developer and subsequent owners. Experience suggests that the following assumptions occur in the EIS: expert opinion is unbiased and accurate; government has the expertise to recognize bias, lack of information, etc in the application; mitigation measures will not be hedged, avoided or not carried out in actual practice; monitoring will discover any problems with the final product and its performance over the years; that monitoring will result in enforcement; enforcement will remedy adverse impacts. Without having sufficient data of a County's adherence to regulations in granting a permit, contractor adherence to construction requirements, extent of County monitoring, data from the results of that monitoring, and data post enforcement, it cannot be assumed that various adverse impacts will not occur or will be remedied. Thus, the unavoidable impacts, which appears to be an assessment of the impacts which occur after everything in the process is done according to regulation, while accurate enough when stated as categories of impact, are highly likely to be greater, sometimes much greater in actuality than what is predicted by this EIS. For example, is there a fish bearing stream in Kitsap County which was not permanently adversely affected and its fish population adversely affected by urbanization? Many no longer have sustaining fish populations. What is known about the development process, monitoring, enforcement, etc applicable to these streams? Can anyone say with any level of confidence that Barker Creek, for example, which has viable salmon and cutthroat populations, would not lose those populations if its surrounding lands were to be urbanized? If you cannot answer this question, you cannot accurately assess the impact of any proposed development. Finally, the EIS assumes that statutory and code provisions protect undeveloped, relatively pristine land from adverse impacts without truly examining their actual implementation in light of experience and data.	Thank you for your comments. Your feedback on the actual effectiveness of permit processes, development regulations, critical areas regulations, monitoring, and enforcement is noted and will be forwarded to County decision makers. The EIS is completed using the best available information.	Letter	3.1
42	Heather Wright	I am commenting as the Planning and Economic Director for the City of Poulsbo. This comment is limited to the proposed expansion of the City of Poulsbo's UGA in proposed Alternative 3. The City of Poulsbo has capacity within our existing city limits and UGA to support our population growth target. We are also seeking to increase capacity within our current boundaries to meet expected population growth based on our historical growth rate. With this, we do not support the expansion of our UGA as proposed in Alternative III.	Thank you for your feedback. Your comments on the Alternatives will be forwarded to County decision makers.	Comment form	2
43	Stephen Growdon	Kitsap County Planning Commission, I have previously written to express my personal strong support for funding for Projects #80 and #90 of the DEIS Transportation Plan of the 2024 Comprehensive Plan. In that email message, I explained some of the reasons why the county needs to move forward with the long-delayed plans to design and build shoulders along Miller Bay Road NE. I want you to be aware that the obvious dangers posed by the absence of shoulders along this arterial, and the compelling need to address this glaring public safety issue, are shared by many residents of north Kitsap. Attached for your consideration is a petition requesting that the county "pursue all necessary planning and funding requirements needed to pave the shoulders of Miller Bay Road." This petition is signed by 33 residents of the community. On behalf of many residents of north Kitsap, I welcome your questions and feedback, and I appreciate your consideration. - Stephen Growdon	Projects 80 and 90 are included in all potential alternatives, shown in Exhibit 3.2.6.3-1. The comment is noted and forwarded to County decision makers.	Email	3.2.6
44	Stephen Growdon	Kitsap County Planning Commission, As you are seeking input on the 2024 Comprehensive Plan, I am writing to express my strong support for funding for Projects #80 and #90 of the DEIS Transportation Plan (Appendix C). Specifically, I hope the county will move forward with the long-delayed plans to design and build shoulders along Miller Bay Road NE. The 5-mile stretch of this major arterial, running from Suquamish to Hansville Road, presently lacks shoulders (paved or unpaved) on either side of the road. In addition to being used extensively by vehicles, Miller Bay Road NE is the site of numerous Kitsap County and North Kitsap School District bus stops, and is widely used by bicyclists, pedestrians, joggers, dog-walkers and others. The absence of a shoulder along this arterial (with a posted 45 mph speed limit) represents a major public safety hazard to school children, neighbors and cyclists who have no choice but to walk or ride along this road. For those on foot or on bike, Miller Bay Road NE is dangerous and terrifying. Furthermore, the construction of shoulders along Miller Bay Road NE has been under the planning stage by Kitsap County for more than 15 years. (See the attached article from the 4/24/2009 edition of the North Kitsap Herald entitled "Wider Shoulders Coming to Miller Bay?") It is high time that Kitsap County addressed this widely-known public safety issue by making it a priority in the 2024 Comprehensive Plan. I welcome you questions and feedback, and I appreciate your consideration. - Stephen Growdon	Projects 80 and 90 are included in all potential alternatives, shown in Exhibit 3.2.6.3-1. The comment is noted and forwarded to County decision makers.	Email	3.2.6
45	Julie Ullrich	Dear Whomever listens, Thank you for your consideration in hearing my concerns with Raydient Rezone/YMCA 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. 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.	Note: Exhibit 3.2.6.1-6, Bond Road is not shown as deficient under existing conditions, or under Alternative 1, 2 or 3 conditions as shown in Exhibits 3.2.6.2-4, 3.2.6.2-5, 3.2.6.2-6 respectively. The comment in regards to Stottlemeyer Road is noted and forwarded to County decision makers. Any future EIS work in this area would need to be considered on a separate basis.	Email	3.2.6
46	Julie Ullrich	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. 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? 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. The animals don't have a voice. Please let's preserve what we have left that's the least we could do for them. Respectfully, Julie Ullrich Snowhill Lane, Poulsbo	The comment is noted and forwarded to County decision makers and comprehensive plan review team.	Email	2

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47	Marc Rimbault	The following recommendations are to promote and improve pedestrian walking and biking safety, along with improving public transportation in North Kitsap. Transportation ☑ Update on Bicycle plan: o Protective bicycle route on: ☑ NE SR HWY 104 from ferry terminal to Hood Canal Bridge ☑ NE West Kingston Road from ferry terminal to Miller Bay Road NE ☑ South Kingston Road NE from NE West Kingston Road to Indianola Road NE ☑ Indianola Road NE from Indianola to Miller Bay Road NE ☑ Miller Bay Road NE / Hansville Road NE from SR HWY 305 NE to Hansville ☑ Bond Road (SR HWY 307 NE) from SR HWY 305 NE to SR HWY 104 NE ☑ Add secure Bike storage at Ferry terminals, Bus transfer stations, Park and Rides areas, pedestrian only areas, shopping areas, sport facility and swimming pool ☑ Update Bus Route plan o Change Bus Route 307 to include Gamble Wood development o Add a Bus Route from Hansville to SR HWY 305 NE at the Suquamish Clearwater Casino along Miller Bay Road NE / Hansville Road NE o Add a Bus Route from Kingston ferry terminal along South Kingston Road NE which includes Jefferson point area ending at to SR HWY 305 NE at the Suquamish Clearwater Casino ☑ Improve Bus Stops by adding Bus Stops islands, actual sidewalk or sidewalk bump outs into the street to allow safe access to the Bus and to slow traffic along the bus route o For the Bus Stops within Kingston on HWY 104 and West Kingston (stop between Arco gas station and Grocery Outlet in Kingston on HWY 104) o For all Bus Stops along the bus routes, install Covered Bus Stops on raised sidewalks ☑ Add a light or a traffic circle at the intersection of SR HWY 104 and Highland Road to improve safety Comments on North Kitsap Comprehensive Plan ☑ Add a light or a traffic circle at the intersection of SR HWY 104 and Barber Cutoff and Parcels Road NE to improve safety ☑ Support a tunnel from Kitsap county to King county to allows Link light rail to connect to Kitsap county while also supporting car, truck, and bus traffic	Project ideas are noted, the comment is forwarded to County decision makers	Comment form	3.2.6
48	Marc Rimbault	Pedestrian improvements ☑ Convert Main Streat into a pedestrian only area from the intersection of NE West Kingston Road with Main Streat to the Kingston Ferry Terminal, while keeping the trees down Main Streat as part of moving ferry traffic off of Main Streat. ☑ Increase pedestrian crossing times on SR HWY 104 for Lindvog Road NE and Bannister Steet NE to allow for a person with limited mobility to cross in the crossing time.	Project ideas are noted, the comment is forwarded to County decision makers	Comment form	3.2.6
49	Marc Rimbault	Parks and Recreation ☑ Add a sport facility and swimming pool near SR HWY 104 and Miller Bay Road to support Hansville, Kingston and Port Gamble area ☑ Add trails or walking paths between all parks, schools, and transit transfer stations	Project ideas are noted, the comment is forwarded to County decision makers	Comment form	3.3.4
50	Marc Rimbault	Housing ☑ Change zoning to allow a mix of housing and business with housing over business, multi-level apartments, quadplexes, triplexes, and duplexes housing units along the improved transit Bus Routes o NE SR HWY 104 from ferry terminal to Hood Canal Bridge o NE West Kingston Road from ferry terminal to Miller Bay Road NE o South Kingston Road NE from NE West Kingston Road to Indianola Road NE o Indianola Road NE from Indianola to Miller Bay Road NE o Miller Bay Road NE / Hansville Road NE from SR HWY 305 NE to Hansville o Bond Road (SR HWY 307 NE) from SR HWY 305 NE to SR HWY 104 NE ☑ All new developments are required to provide side walks and protected bike lanes from the development to existing transit routes	Thank you for your comment. Your feedback on zoning in the preferred alternative will be forwarded to County decision makers.	Comment form	3.2.3
51	Marla Powers, S'kallam Tribe	DEIS General Comment: Context: The State Environmental Policy Act Handbook, updated in 2018, provides a number of general standards for a DEIS and FEIS. The EIS substantive authority (WAC 197-11-660) states that any government action may be conditioned or denied under SEPA to mitigate the environmental impacts. The DEIS, Section 1.5 Summary Tables includes the impacts & mitigation measures for 9 topics. Four of these topics are described as resulting in significant unavoidable adverse impacts. The Transportation summary states that there will be no significant unavoidable adverse environmental impacts even though the impacts state that vehicle miles traveled (VMT) will increase between 72 and 78 percent and that greenhouse gas (GHG) emissions will continue to rise. Comment: The Earth, Air Quality/Climate/Noise, Water Resources, Plants & Animals, and the Transportation Topics must all be revised to include mitigating measures that are sufficient to mitigate the identified impacts in the DEIS.	Alternative 2 has the least impact with VMT/GHG of the three alternatives. The preferred alternative will address VMT/GHG and identify those impacts that are unavoidable vs. those that have mitigation through.	Letter (via comment form)	3.1, 3.2.6
52	Marla Powers, S'kallam Tribe	Mitigation: Context: Referenced mitigation measures throughout the EIS point to the WRIA 15 Watershed Restoration and Enhancement Plan, Salmon Recovery Plans, Critical Areas Regulations, the Shoreline Master Program, the Stormwater Ordinance, and other reports and plans as a way to mitigate the environmental impact identified in the EIS. Some State and Federally listed Endangered and Threatened Species have been listed since 1999. Comment: The county can not rely on the WRIA 15 Watershed and Restoration and Enhancement Plan because it is not an adopted plan. It may be years before the plan is adopted. The WRIA 15 Plan is mandated by state law to result in a net ecological benefit to instream resources, but many involved in the review of the plan rejected the plans' ability to meet these criteria. It needs to go farther to offset the consumptive water use from the expected new permit exempt wells to avoid negative impacts to groundwater recharge. Of the approximately 40 projects listed in the plan, Kitsap County is listed as a project sponsor for one project. Lead Entities for salmon restoration/recovery plans have been authorized by the legislature since 1998. The Hood Canal and Eastern Strait of Juan de Fuca Summer Chum Salmon Recovery Plan was developed in November 2005 in response to the ESA listing for summer chum. More recovery plans have been added. These plans are important, and work must continue, but these plans are not fixing the problem and they do not exist to provide additional mitigation to future projects. The county is relying on decades old action to mitigate anticipated environmental impacts from future development. More mitigation is needed to prevent and halt all habitat degradation. Critical Areas Ordinance was originally adopted on November 25, 2013. The purpose of the ordinance was to "Achieve no net loss and increase the quality, function and value of wetland acreage with Kitsap County..." KCC 19.200.205. No net loss (NNL) has been a standard for 20 years. Yet, during the 2022 Legislative session through the proviso contained within the Engrossed Substitute Senate Bill 5092-the Washington State Legislature directed the Washington Department of Fish and Wildlife (WDFW) to investigate a pathway for incorporating a Net Ecological Gain (NEG) standard into state law with the goal of improving endangered species recovery and ecological health statewide. WDFW submitted a letter and report to the legislature, Net Ecological Gain Standard Proviso Summary Report, December 2022. The letter states, "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." The county can not rely on NNL policies to mitigate significant unavoidable adverse impacts to the environment. Additional mitigation measures are needed. Shoreline Master Program (SMP) was first adopted in 1976 and the purpose is to guide the future development of the shorelines in Kitsap County in a manner consistent with the Shoreline Management Act of 1971. Exhibit 3.1.3 1-2 Existing conditions of the county's Shorelines of the State lists nine streams/rivers. These streams and rivers are described as being impaired with impacts such as being on the 303(d) list for DO, pH, bacteria, having fair floodplain connectivity, temperature, etc. County data indicates that 82% of the shoreline properties within the county have been developed and 38% of the shoreline has been altered with shoreline armoring. Policies need to be put into place to protect the existing shoreline and restore as much as possible in the future. The SMP is also based upon the NNL policy. This policy does not work, and significant revisions need to be put in place to mitigate the adverse environmental impacts of the future development of Kitsap County.	Thank you for your comments. The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter (via comment form)	3.1
53	Marla Powers, S'kallam Tribe	Rural Character: Context: Section 3.2.2.1 Relationship to Plans & Policies –Affected Environment. This section describes Rural Lands, specifically, "The rural element may allow for a variety of rural densities and uses, but it should include measures for the protection of rural character, bot in terms of the visual compatibility of rural development with surrounding areas and in terms of reducing the inappropriate conversion of undeveloped land into sprawling, low-density development." Page 3-26. Comment: The diversity of rural densities is lessening in North Kitsap County. The Port Gamble S'Klallam Tribe is working toward putting lands north of the existing reservation land into trust. This will remove a large swath of Rural Wooded (1 DU/20Ac). There is a 400 acre request to change land use and zoning from Rural Wooded to Rural Residential (1 DU/5 ac) adjacent to the Port Gamble Forest Heritage Park. This is a rezone the tribe does not support. There are many other requests being reviewed by the county to convert Rural Wooded to a smaller lot for single family development. 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.	Thank you for your comments. Your feedback on the rezone request will be forwarded to County decision makers.	Letter (via comment form)	3.2.2

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54	Marla Powers, S'kallam Tribe	Rural Growth: Context: Exhibit 3.2.2. 1-1 Vision 2050 calls for reduced rural population growth rates in all counties and encourages counties to plan for even lower growth rates than contained in the Regional Growth Strategy (approximately 5%). PSRC MPP-RGS-14, "Manage and reduce rural growth rates over time, consistent with Regional Growth Strategy, to maintain rural landscapes and lifestyles and protect resource lands and the environment." Comment: The county's rural development expectation should be in the single percentage range. The King County EIS also released as a supporting document to the mandated Comprehensive Plan Update in 2024 states that the rural area population will be 1% annually. The county can achieve increased limited development in rural areas. The county expects to grow by 15% in the rural area as analyzed by the EIS. This is too high. A measure to support decreased rural growth would be to remove the Rural Residential Zone.	Thank you for your feedback. Your comments will be shared with County decision makers.	Letter (via comment form)	3.2.2
55	Marla Powers, S'kallam Tribe	Rural Impacts: Context: Exhibit 1.5-3 Summary of impacts and mitigation-Water Resources states that, "impacts on water quality in rural areas are also assumed to be proportional to the number of residences served by onsite septic systems, which have the potential to produce higher loads of nutrients and bacteria." Page 3-49 a discussion of the Hood Canal Dissolved Oxygen describes a State Legislature adoption of the Hood Canal Rehabilitation Program to develop a program to address the rehabilitation of Hood Canal in Mason, Kitsap, and Jefferson Counties under RCS 90.88. The Upper Hood Canal Restoration Project (2005) Final Report and Hood Canal Coordinating Council Regional Pollution Identification and Correction Program (PIC) focused solely on onsite septic system issues as a source of pollution. Comment: Rural development means no urban services. One of the most important services urban areas provide is sewer. Rural development for single family homes requires the use of an on-site septic (OSS) with every home. The OSSs are guaranteed to fail at some point. Homeowners/renters don't understand what is required for maintenance, inspection, and replacement. It is expensive to own an OSS. This is a differed cost that the county does not need to manage with development in the county. Due to the significant impact these uses have on the environment, their future use in all rural development in the foreseeable future, and the lack of oversight the adverse environmental impacts are high. There are several mitigation measures that could be used. One, remove the Rural Residential Zone. Two, charge county residents with OSS a fee for the county to inspect, maintain, replace, and monitor all OSS. Three, use alternative methods of managing waste. Four, several other mitigating measures are out there and available. Add as many as possible to mitigate this environmental impact. Current policies are not enough to limit single family development growth and environmental impacts in rural areas.	Additional potential mitigation measures for on-site septic systems will be contemplated and included in the Final EIS as appropriate.	Letter (via comment form)	3.1.3
56	Marla Powers, S'kallam Tribe	Context: The tribe requested a number of additional topics be included in the EIS review with a letter submitted on December 8, 2022. Comment: <ul style="list-style-type: none"> Climate change should have a section of its own. It is sprinkled throughout but it would be clearer if it were in its own section. More detail could be provided for sea level rise, increased storm intensities, and the health impact climate change will have. Tree canopies were mentioned six times in the EIS. Reliance on tree canopy loss is based on the draft code provided. This is relinquishing tree canopy to a development activity. Robust efforts and policies should be reviewed and implemented as mitigation to ensure there is no loss of tree canopy over time. Fish passage barriers were not specifically discussed. Improvements to fish passage barriers extend beyond fish passage to decreased local area flooding, functioning riparian areas capable of infiltrating more water, improved habitat with additional tree canopy, GHG sequestration, connection to wildlife corridors, and other benefits. Analysis of groundwater quantity and quality should be included. Is there enough water to support the additional population and job growth? Can Kitsap County ensure that tribal senior water rights will not be impacted? PGST is concerned about the capacity for wastewater treatment and the heavy use of septic tanks for more rural development. Include analysis of environmental impact of septic tank use for development. Evaluation of Net Ecological Gain was not discussed in the EIS. This measure could go far as a mitigation measure toward reducing significant adverse environmental impacts. 	The comment is noted and forwarded to County decision makers. Based on the preferred alternative, more discussion of these topics may be included in the FEIS.	Letter (via comment form)	Scoping
57	Doug Hayman	The environment can survive without humans, but humans cannot survive without a healthy environment. This is an essential starting point in looking at the plans by people in Kitsap County on how we will proceed for the coming decades. What follows are my thoughts and concerns in examining the 400+ page Draft EIS. • On page 7 of the Draft EIS, it mentions a required approval by the Kitsap Planning Commission. I have attended a handful of their online meetings via Zoom and find that they may need to be provided a better explanation of how each of the proposed alternatives truly work. Those commissioners need more information on what has been discussed in the Critical Area Ordinances working groups and would benefit by hearing short presentations by DCG Watershed, the firm hired to provide recommendations on Best Available Science as it pertains to Kitsap County's CAO update work. Additionally, hearing from the Washington Department of Fish and Wildlife and the Department of Ecology would be of great benefit to then shape their decision-making process. One area in particular stands out, the suggested use of Riparian Management Zones to replace current stream buffers. The commission could use more detail on that science and process.	The comment is noted and forwarded to County decision makers.	Letter (via comment form)	n/a
58	Doug Hayman	<ul style="list-style-type: none"> One critical thing that lacked specifics in this Draft EIS is just how each of the household income brackets will get their housing needs met. We need to actively target meeting the housing needs of middle- and low-income households regardless of which alternative is chosen with specific detail on what income ranges are already saturated in unincorporated Kitsap County versus what is still lacking. The EIS repeatedly says that Alternative X will meet housing but not jobs or vice versa with little concrete detail. 	Thank you for your comments. The revised Comprehensive Plan and FEIS will include details on planning for housing allocations by income band.	Letter (via comment form)	3.2.3
59	Doug Hayman	<ul style="list-style-type: none"> In 1.3, pg. 22, the draft says: "Ultimately, the Board of County Commissioners (Board) will select a preferred alternative. The Board is not limited to selecting the alternatives exactly as set forth in the EIS and may select an alternative that combines various features of the alternatives set forth in the EIS. However, the selected alternative must be within the range of alternatives addressed by the EIS (WAC 197-11-655(3)(b))." The text I've emphasized in bold raises big flags for me. Pick an alternative and stick to it. Alternative 2 and Alternative 3 are quite different and we shouldn't be opening up a buffet line of sticking to UGAs but then allow expansion into areas zoned to maintain rural standards. Of particular concern would be the request by Raydient to rezone approximately 400 acres currently zoned at 1DU/Acre to a much higher density without a real public need for this but instead much opposition to their request. 	Thank you for your comment. Your feedback on the alternatives and the selection of a preferred alternative will be forwarded to County decision makers.	Letter (via comment form)	1.3

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60	Doug Hayman	<ul style="list-style-type: none"> On page 28 and in many other parts of this Draft EIS there is language like this which needs to be strongly fact checked: "Under Alternative 3, increased riparian buffer widths are proposed compared to Alternative 1 and 2. Within the proposed UGA boundaries, approximately 508 acres would be encumbered by the increased stream buffers, compared to 245.5 acres that would be affected by the existing 50-foot buffers. This increase will improve protections compared to Alternative 1 and 2." As someone who took part in the Critical Area Ordinances Update Working group for the Fish and Wildlife section where Riparian Management Zones (RMZs) were discussed, not only was there not enough time to fully discuss this proposed change to stream buffers, there was never mention along the lines of implementing this only for one of the three proposed alternatives. In fact, we left those two meetings thinking that the county might implement it in whole, as a hybrid model or not embrace RMZs at all. And the planning commissioners need some additional information on these as some in their most recent meeting think the WDFW tool is not yet ready for implementation when in reality they are likely more fearful that the increased buffers from 100-feet to perhaps 200-feet would be too much of an encumbrance on property owners. And this will be a challenging process to use RMZs for any of the three alternatives as those wouldn't need to be tied to just alternative 3. 	Thank you for your comment. The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts. Your feedback is being forwarded to County decision makers.	Letter (via comment form)	1.5, 3.1
61	Doug Hayman	<ul style="list-style-type: none"> Pg 34 referring to 3.2.3 states: "Alternative 2 projects to develop 14,684 housing units, which meets the housing need target, and produces about an even split of housing that serves lower income households and middle to upper class income households." Where in these out-of-the-air estimates do you show how you'll meet middle- and low-income housing needs. Are you locking in building permits only for home that guarantee they'll be at prices to meet the income of those segments, or will these be home that cost \$600k or more? 	The planning for housing by income level is being included as part of the updated comprehensive plan in the Housing Element. The local government does not actually control the household income of households that choose particular units unless it is subsidized for particular income levels. Planning for housing income bands involves ensuring that the County has enough capacity for units that are likely to be affordable based on what type of unit/structure it is.	Letter (via comment form)	3.2.3
62	Doug Hayman	<ul style="list-style-type: none"> On pg. 38 referring to 3.2.6 it states: "Generally, each alternative results in similar levels of transportation impact." This seem to be in error as an increased density in a UGA like Kingston with public transportation would mean far fewer cars on the road than if the added population was traveling to newly expanded developments in rural zones. This needs to be called out and real numbers shown on how you make such general statements. 	As discussed throughout the plan, all alternatives would generally foster the greatest share of growth in urban areas. Transportation impacts are identified with this in mind. We will expand discussion of transportation impacts in this section.	Letter (via comment form)	3.2.6
63	Doug Hayman	<ul style="list-style-type: none"> On pg. 46 in reference to 3.3.6 for Solid Waste is again providing a questionable assumption: Why would humans in any of the three alternatives be producing more or less solid waste? How do you arrive at: "tons of solid waste and recycling generated per year would be highest with Alternative 2." 	Ongoing discussion with County Solid Waste Division to provide more context to this statement. FEIS to include further context.	Letter (via comment form)	3.3.6
64	Doug Hayman	<ul style="list-style-type: none"> On pg. 53 referring to 2.1.2 there is mention of "housing affordability and availability" but how with any of the three alternatives are you truly enforcing this goal? If we are saturated in the housing for upper income households, will you block issuing any more building permits until the lower tiers of income have their affordability and availability needs met in unincorporated Kitsap County? 	The local government does not actually control the household income of households that choose particular units unless it is subsidized for particular income levels. Planning for housing income bands involves ensuring that the County has enough capacity for units that are likely to be affordable based on what type of unit/structure it is.	Letter (via comment form)	2.1.2
65	Doug Hayman	<ul style="list-style-type: none"> In 2.2.2.2 on public participation, how will you go beyond "public participation theater" so that the public tracks that their comments were not only submitted, but also taken in by decision makers and discussed? 	This comment response matrix tracks the County's response to all the comments received. Staff will include the comments, the index and categorization of each comment, and this comment response document along with their analysis and recommendations to the County Board of Commissioners as they deliberate and select a preferred alternative.	Letter (via comment form)	2.2.2
66	Doug Hayman	<ul style="list-style-type: none"> Maps used throughout this Draft EIS PDF are highly problematic. They are densely filled with information and even those that can be zoomed in on, result in losing access to simultaneously seeing the legends for the maps. These should be provided as hyperlinks to online GIS maps similar to what the Kitsap Parcel search tool has where the public can zoom in/out while the legend remains, and a choice to activate layers to see just those portions for better clarity. Lastly, you are failing to meet federal accessibility standards which at the minimum would have good alternative text to describe the images and not auto fill in things like "a map of the United Kingdom" which currently exists for many of these Kitsap maps. Throughout the PDF all images relied upon autogenerated descriptions that failed to describe what the images are every time. These are what blind and low vision users rely upon to fully access what the county shares out to citizens. 	Alternative text for maps and images will be improved in the Final EIS.	Letter (via comment form)	All
67	Doug Hayman	<ul style="list-style-type: none"> In 2.4 Alternatives you once again mention the highly problematic "The Board is not limited to selecting the alternatives exactly as set forth in the EIS and may select an alternative that combines various features of the alternatives set forth in the EIS. However, the selected alternative must be within the range of alternatives addressed by the EIS (WAC 197-11-655(3)(b))." Pick a plan and stick to it, especially where not doing so would allow creep into areas that should remain rural. 	Thank you for your comment. Your feedback on the alternatives and the selection of a preferred alternative will be forwarded to County decision makers.	Letter (via comment form)	2.4
68	Doug Hayman	<ul style="list-style-type: none"> In 2.4.2 it says, "Rural Rezones: Only those that promote limited rural employment opportunities." This is imperative, especially in the case of Raydient's rezone request as it wouldn't truly provide an employment benefit that isn't already being met elsewhere in North Kitsap. 	Thank you for your comment. Your feedback on the alternatives and the rural rezone will be forwarded to County decision makers.	Letter (via comment form)	2.4.2
69	Doug Hayman	<ul style="list-style-type: none"> 2.4.3 states for Alternative 3, "Reclassification Requests: Includes most requests except those that are GMA-non-compliant (e.g., urban zones in rural areas, one-acre zoning, etc.)." Raydient's rezone request has been tossed into both alt 2 and alt 3 and both are problematic as it goes against the intent of the GMA to keep rural areas rural. 	Thank you for your comment. Your feedback on the alternatives and the rural rezone will be forwarded to County decision makers.	Letter (via comment form)	2.4.3
70	Doug Hayman	<ul style="list-style-type: none"> The table on pg. 68 of the Draft EIS PDF in reference to stream buffers again is questionable for buffer widths not changing with alt 1 or alt 2 versus alt 3. The CAO update working groups were never discussing such restrictions on where riparian management zones as stream buffers would or would not be applied. And the 100-foot buffer is a minimum to prevent pollution but could be much wider with RMZs if the site-specific tree height for dominant trees was say, 200 feet or more for a 200-year old tree. There needs to be clarification on why Alt 2 would not be able to include RMZs for setting buffer widths. 	Thank you for your comment. Your feedback on the alternatives and the stream buffers/RMZ will be forwarded to County decision makers. Please note that the Critical Areas Ordinance drafting has been completed since the end of the DEIS comment period.	Letter (via comment form)	2.5.1
71	Doug Hayman	<ul style="list-style-type: none"> In 2.5.2 you state that "County staff reviewed the reclassification requests and categorized them as follows: o 1. Requests that fit the "Compact Growth/Urban Center Focus" of Alternative 2 o 2. Requests that fit the "Dispersed Growth Focus" of Alternative 3 o 3. Requests that did not fit Alternative 2 or 3 because the change was inconsistent with GMA or other requirements." This does not seem to be accurate as it pertains to Raydient's rezone request being dropped into both alt 2 and alt 3. It clearly goes against the intent of the GMA. That rezone request does not meet a public need and would increase density in an area that is supposed to be 1 home per 20 acres. Someone made a mistake on this or is biased towards this developer. 	Thank you for your comment. Your feedback on the alternatives and the rural rezone will be forwarded to County decision makers.	Letter (via comment form)	2.5.2

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
72	Doug Hayman	<ul style="list-style-type: none"> In tables 2.5.3 and ones like it you fail accessibility standards wherein you used color alone to distinguish items. Look up “WCAG” and “color alone” to remedy this failure to reach all the citizens in an equitable manner compliant with the law. 	Thank you for your comment. We will remedy the colors in the Final EIS.	Letter (via comment form)	2.5.3
73	Doug Hayman	<ul style="list-style-type: none"> Table 2.5.3-5 stands out for how it does not show the housing capacity for each of the income ranges, unless I’m reading something else in there. We need to know specifically how Kitsap DCD will enforce meeting the housing needs of middle- and low-income households regardless of alternative 1, 2 or 3 and not throw around sub-totals and totals for each without citing details. 	As previously stated, the local government does not actually control the household income of households that choose particular units unless it is subsidized for particular income levels. Planning for housing income bands involves ensuring that the County has enough capacity for units that are likely to be affordable based on what type of unit/structure it is. The housing band income allocations documentation will be included in the revised draft of the Housing Element in the draft comprehensive plan.	Letter (via comment form)	2.5.3
74	Doug Hayman	<ul style="list-style-type: none"> In 3.1.1.3 it states, “Kitsap County will encourage building sites to be located away from critical areas, such as steep slopes and landslide hazard areas, by requiring minimum buffer widths and building setbacks in the CAO.” In my experience in looking at several variance requests in the area, the county tends to lean towards NOT strictly enforcing buffers, whether that relates to hazards for the homeowner or risks to the health of the critical areas. Whichever plan is chosen, or CAO updates are made, the county needs to make variances the exception and not the norm. 	Noted. Your feedback will be forwarded to County decision makers.	Letter (via comment form)	3.1.1.3
75	Doug Hayman	<ul style="list-style-type: none"> In 3.1.2.1 it states, “Kitsap County does not appear to have a current tree canopy cover inventory that could be referenced as the baseline condition.” This is a very important issue that follows pretty much all monitoring. If the county is striving towards no net loss of ecological function, you cannot know if a decline is happening if you’re not willing to put the resources into such baseline monitoring followed up later to see if you are succeeding. 	Cascadia utilized the ICLEI (International Council for Local Environmental Initiatives) and LEARN (Land Emissions and Removals Navigator) spatial analysis tool to estimate baseline tree canopy coverage. The county can improve precision of this data set by conducting county-wide tree canopy mapping. As noted, this could be a component of a future monitoring program.	Letter (via comment form)	3.1.2.1
76	Doug Hayman	<ul style="list-style-type: none"> In 3.1.2.3 states, “Environment Goal 1. Formally treat natural environments, including forest lands, shorelines, freshwater systems, intact ecosystems, and other critical areas, as an essential asset that is planned for, managed, and invested in to meet the needs of current and future generations.” This sounds great on paper but how will you truly commit to this if you allow variances again and again for fear of unconstitutional takings? This difficult challenge needs to be addressed and not swept under the rug till the next comp plan work years from now. 	Environmental Goal 1 is achieved through the Critical Areas Ordinance (CAO) implementation and enforcement, public outreach and education on critical area functions and values, and County projects that support this goal and demonstrate stewardship. The CAO requires mitigation for any permitted critical area impacts.	Letter (via comment form)	3.1.2.3
77	Doug Hayman	<ul style="list-style-type: none"> In 3.1.3.1 regarding Critical Aquifer Recharge Areas (CARA) you state, “CARAs are regulated under the Kitsap County CAO (Kitsap County Code 19.600).” That doesn’t mean much if the regulation is written on paper but is ignored in the variance process by DCD. Hold fast to protecting critical areas and if you cannot, address why it is that you aren’t complying with the GMA in this regard. 	Noted. Your feedback will be forwarded to County decision makers.	Letter (via comment form)	3.1.3.1
78	Doug Hayman	<ul style="list-style-type: none"> On page 140 of the PDF, where are you coming up with: “Under Alternative 3, an additional 5,674 lineal feet of non-fish bearing streams will be affected by the UGA expansion areas compared to Alternative 1. As a result, stream water quality would be expected to decline in those areas where growth is greatest under Alternative 3. Additionally, 17,936 feet of non-fish bearing waters would be affected by up zoned areas under this Alternative. Surface water impacts on streams would be generally greater under Alternative 3 than under Alternatives 1 and 2. The greatest impacts to those basins would be directly associated with the most extensive conversion to impervious surfaces. Under Alternative 3, increased riparian buffer widths are proposed compared to Alternative 1 and 2. Within the proposed UGA boundaries, approximately 508 acres would be encumbered by the increased stream buffers, compared to 245.5 acres that would be affected by the existing 50-foot buffers. This increase will improve protections compared to Alternative 1 and 2.” This was not part of the CAO working group discussion of RMZs, that only one alternative would possibly implement them. 	Thank you for your feedback. Your comments will be shared with County decision makers.	Letter (via comment form)	3.1.3.2
79	Doug Hayman	<ul style="list-style-type: none"> On page 159, Impacts Common to All Alternatives, again I challenge the line, “Critical areas, including streams and wetlands, would receive similar protection under each of the alternatives with some increased protections for riparian areas in Alternative 3.” This inaccurate RMZ information needs to be addressed. 	The DEIS was completed prior to the completion of the draft Critical Areas Ordinance. The Final EIS will contain more information on the CAO as a mitigation measure. The County decision makers will have the full draft CAO to consider as they contemplate a preferred alternative.	Letter (via comment form)	3.1.4.2
80	Doug Hayman	<ul style="list-style-type: none"> In 3.2.1.3 for Mitigation Measures it also states, “Critical areas, including streams and wetlands, would receive similar protection under each of the alternatives with some increased protections for riparian areas in Alternative 3.” Again, the CAO update process for Fish and Wildlife working groups did not tie the use of Riparian Management Zones only to one of three alternatives. It was the use of Best Available Science recommendations to better protect riparian zones. This needs to be corrected and “similar protection” is a fallacy if one alternative uses 50-foot buffers that then get a variance while alternative 3 supposedly uses RMZs to be 100-foot or wider. 	The DEIS was completed prior to the completion of the draft Critical Areas Ordinance. The Final EIS will contain more information on the CAO as a mitigation measure. The County decision makers will have the full draft CAO to consider as they contemplate a preferred alternative.	Letter (via comment form)	3.2.1.3
81	Doug Hayman	<ul style="list-style-type: none"> On page 192 it states, “Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.” What mechanism would allow DCD to both protect the environment AND compensate property owners so that these were not mutually exclusive conditions? 	The Variance (KCC 19.100.135) and Reasonable Use Exception (KCC 19.100.140) processes allow for property owners to make at least limited use of their property while still protecting the environment. Your concern about the way the variance procedure in particular is used in the county is noted.	Letter (via comment form)	3.2.2
82	Doug Hayman	<ul style="list-style-type: none"> How will you meet the following mentioned on pg. 196? “Public participation procedures that are described in the procedural rules (WAC 365-196-600) include broad dissemination of proposals and alternatives, opportunity for written comment, public meetings after effective notice, provision for open discussion, communication programs, information services, and consideration of and response to public comments.” Especially that last point? Would there be feedback on my challenge that RMZs should not just be associated with Alternative 3 and the public would know about how this comment was being addressed? 	You and others who have made this comment about RMZs and Alternative 3 should know that your feedback is being considered by staff and the County Board in the coming weeks as the Board is set to deliberate regarding the selection of a preferred alternative.	Letter (via comment form)	3.2.2

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
83	Doug Hayman	<ul style="list-style-type: none"> On pg. 247 of the PDF, how is it that you all arrive at the specifics of, "Alternative 2 is the only alternative which adequately meets the expected housing need by 2044 as projected by the Housing All Planning Tool developed by the Washington State Department of Commerce. Alternative 2 projects to develop 14,684 housing units and produces about an even split of housing that serves lower income households and middle to upper class income households." Will you enforce not allowing new developments of homes that don't meet the middle and lower household income affordability standards or is this just vague speculation for rating the alternatives? 	As noted previously, the County does not actually control the incomes of households who live in particular units in almost every situation. (Permanent supportive housing and other subsidized housing are the exceptions.) Rather, it is based on what the zoned capacity is for housing types that are most likely to be associated with different income brackets. Alternative 2 has significantly more capacity for housing types that are likely to be affordable to households making below 80 percent of the median, which is why this statement is valid. Additional detail on precisely how much capacity is available in different zones will be provided in the Final EIS.	Letter (via comment form)	3.2.3.2
84	Doug Hayman	<ul style="list-style-type: none"> On page 249 there is the questionable assertion, "Alternative 3 is the only Alternative that meets the 2044 employment target, generating 1,157 more jobs than the target." Just because you expand into areas with rezones doesn't guarantee increased employment. Or that employment increase would be fleeting as it might just be during a new building phase that more people in that area would be employed in construction. As a citizen I call upon you all to protect the environment by measuring ecosystem health now to have a baseline to compare to later to see if you have achieved no net loss or better yet, a net ecological gain in ecosystem well-being. Take into consideration the reality that you cannot have infinite growth in a finite world. You can only squeeze so many people into an elevator, bus or county. We do not need to develop every bit of land in Kitsap County. People choose to live here because of the natural beauty they are surrounded by. We can protect our critical areas like streams, wetlands, aquifer recharge areas. We do not have to yield to demands to develop into those areas and should find mechanisms and incentives to reward property owners for protecting these places. We need to meet the housing needs of all income ranges as directed by the Growth Management Act, not just build expensive home for the upper tiers of our county. Cap development of those upper end homes in unincorporated Kitsap County until we've met the needs of the middle- and lower-income tiers. 	Thank you for your comment. The County is required by law to demonstrate that it has the capacity to accommodate projected population and employment growth. The methodology for determining the employment capacity is documented in the Land Capacity Analysis.	Letter (via comment form)	3.2.3.2
85	Jake Coutlee	To Whom It May Concern, I strongly oppose the zoning changes of alternative 3. This alternative does not support limiting urban sprawl and I feel that it does not align with the intent of Washington State's Growth Management Act. I prefer alternative 2 as it focuses more on urban development and limits the impact on Kitsap 2 County's rural environments and natural habitats. My most specific problem with alternative 3 is the rezone of the Raydient property near Bond, Stottlemeyer, and Port Gamble Roads. While the rezone is for 1DU/5 Ac, I know the intention is to turn this set of parcels into an 80 unit housing development with a YMCA adjacent to it. The addition of this housing development at this location would create numerous problems. First, this would reduce the rural land/habitat in Kitsap County as this land is currently working forest. Environmentally speaking, this land should be left alone. Second, a housing development at this location would be a traffic nightmare. Not only would this create another busy intersection on an already busy road, but the added vehicles traveling on Bond Road would significantly contribute to traffic on an already overloaded thoroughfare. This would lead to a number of different problems, including longer commutes and increases in traffic accidents. I believe that Kitsap County's Comprehensive Plan should be "Focused Growth" to help preserve Kitsap County's rural beauty, promote more efficient transportation, and maintain Kitsap County as a wonderful place to live. Thank you, Jake Coutlee	Thank you for your comment. Your feedback on the alternatives and the rural rezone will be forwarded to County decision makers.	Comment form	2
86	Robin Shoemaker	In scanning DEIS comments on Alternates 2 and 3, both alternates have impacts. I would like to reiterate my earlier comments already logged regarding a preference for the zoning for Alternate 3 as it allows more meaningful environmental sensitivity and consistency with surrounding properties related to my property. That alternate remains my preference and recommendation as a 2 result. But, in either scenario, and should Alternate 2 be recommended to the Planning Commission, I would like to suggest that both of our West Kingston Road properties - and in particular our undeveloped parcel - be allowed to connect to sewer through a waiver or whatever means necessary, for the reasons already noted in earlier comments. Thank you. Robin Shoemaker	Thank you for your comment. Your feedback on the alternatives and the selection of a preferred alternative will be forwarded to County decision makers.	Comment form	2
87	Jack Stanfill	To Whom t May Concern. The 2024 DRAFT ENVIRONMENTAL IMPACT STATEMENT, Kitsap County, is a travesty: RCW 40.16.030 Offering false instrument for filing or record. RCW 40.16.020 Injury to and misappropriation of record. WAC 197-11-080 Incomplete or unavailable information. Many laws have been broken by Kitsap County and the City of Bremerton. With this email, I inform you that I strongly oppose the 2024 Draft Environmental Impact Statement, Kitsap County. On January 24, 2024, I answered the Washington Attorney General's Motion to dismiss my Environmental Complaint, PCHB No. 23-019. I intend to file my report with the with the GMA folks at the Pollution Control Board. Please contact me if you have questions. Respectfully, Jackie W. Stanfill	Noted.	Comment form	n/a
88	James Heytvelt	Dear DEIS administrators. I have reviewed the DEIS , and approve. I did participate in the PROS plan with Kitsap County Parks and gave my input. One item I would like to note. For a walk on ferry person getting a late morning or early afternoon ferry from Southworth to Fauntleroy in West Seattle I have found the Southworth ferry lot to be full to park my vehicle . While there is plenty of space at the Harper Park and ride at those time where a person could park there appears to me not to be transportation from the Southworth ferry dock back to the Harper Park and Ride in the late evening hours. Thus I have elected to drive around in stead of taking a ferry as a walk on. Thank you for the opportunity to comment. James Heytvelt James Heytvelt jmheyvelt@wavecable.com	The comment is noted and forwarded to County decision makers.	Comment form	3.2.6
89	Anonymous	Walk, Bike and Roll Facilities - "Kitsap County has been retrofitting existing roads with wider shoulders or sidewalks as funding allows..." Providing some defined minimum width of paved shoulders where not present and where right-of way allows on classified roadways should be a requirement (if feasible) with any pavement preservation project and not as funding allows. Recent preservation on Fairgrounds Rd left shoulders unpaved and unsafe with active transit stops sitting in the uneven dirt 4 feet from the edge of pavement. The county saved minimal dollars at the expense of pedestrian safety and ADA accessibility.	The comment is noted and forwarded to County decision makers.	Comment form	3.2.6
90	Anonymous	Wastewater - "Several capacity improvements to existing pump stations and sewer mains would also be needed to ensure the existing system could handle additional flows from development within the UGAs." The County should be assessing 2 impact fees to support wastewater capital improvements similar to transportation. Growth (new development) should pay for growth (system capacity needs) and not just for the extension to serve the development. Future development should not overly burden existing rate payers to finance develop-driven capacity capital improvements.	The comment is noted and forwarded to County decision makers.	Comment form	3.3.7
91	Susan Digby	Greetings, I live on Marine Drive. It is a dead end street with no turn around. I have several concerns about high density housing. I expect you have these thoughts already but here they are: Safety: Marine Drive is on the one road along a finger of land. This means that if there is a wild fire on the south end, a tsunami that destroys the low elevation portion of the road by Kelly Road, or downed electrical wires, access to this area is not possible. High density housing puts more people at risk.	The comment is noted and forwarded to County decision makers.	Comment form	3.2.6
92	Susan Digby	Environmental impact on Dyes Inlet: More houses on Marine Drive will increase chemicals from lawn treatments.	Additional language on the water quality impacts of development due to lawn care treatments will be included in the Final EIS.	Comment form	3.1.3
93	Susan Digby	Wastewater handling system : A bigger issue for Bremerton as a whole (not Marine Drive because we are on septic systems) is that our current wastewater handling system is undersized with the result that there are almost routine overflows of sewage into Dyes Inlet. The wastewater system needs to be sized to accomodate more houses.	The comment is noted and forwarded to County decision makers.	Comment form	3.3.7

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
94	Susan Digby	Climate change and forest cover: We need all the trees that we can possibly save. I urge you to build in ways through requirements to ensure that forest cover is saved wherever possible and that new trees be planted when trees have to be removed. It's important for our health and that of salmon survival. Water entering the Sound needs to be as cool as possible. Sincerely, Susa Digby	Thank you for this comment. We modeled the estimated emissions associated with tree loss across the different alternatives. Additionally, there are policies that focus on forest and tree coverage conservation and restoration that addresses this. Regulations regarding tree retention and replacement are expected to mitigate projected tree canopy losses under all the alternatives to some extent.	Comment form	3.1.2
95	Jess Chandler	On p. 3-20 of the Environmental Impact Statement, it is acknowledged that Kingston is intended to become an incorporated city but not Silverdale. In other places (not that I have found in this document), Silverdale is also intended to become an incorporated city. Is this an oversight?	Silverdale is intended to become an incorporated city. In fact, in Section 2.3.1, Kingston and Silverdale are mentioned as both being expected to incorporate sometime within the 2044 planning horizon. The section in question will be updated accordingly to reflect that this applies to both Kingston and Silverdale.	Comment form	3.1.2
96	Thomas (Mike) Garrett	Many of our aquifers are being rapidly depleted by over-pumping. As the overpumping occurs, the land can settle as water is pumped out leaving less space for the new water to refill the aquifer. Overpumping can also cause saltwater intrusion also which can damage the entire aquifer beyond use. Kitsap County should facilitate a contingency fund to cover the cost of rural parcel owners for the loss of their private wells due to over-pumping and saltwater intrusion of the aquifers due to the rural growth forecast. A plan should also be developed to install new water pipelines in existing rights-of-way to facilitate new water connections to the rural parcel owners losing their wells due to over-pumping and salt water intrusion. Kitsap County should also fund the research for other solutions with existing and new technologies to solve this problem. Kitsap County should take into consideration all private wells when determining total water usage forecast for the CAO Hydrology Plan and EIS	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Comment form	3.1.3
97	Jess Chandler	The details of the travel demand model referenced on p. 3-144 of the Draft EIS are not readily available - I have tried to find the referenced 'Kitsap County 2020 Travel Demand Model Update' and failed to find more than a summary. It is also not listed as a reference document or in the related links. Can you point me to this file? Thank you.	This information has been provided by the Public Works Department	Comment form	3.2.6
98	Leslie Newman	I would like to see Manchester take a pro active approach to planning and future development. I vote for Level 3 plan. Thank you Leslie Newman	The comment is noted and forwarded to County decision makers.	Email	n/a
99	Mark Vigna	Regarding the proposed revisions to zoning along Lindvog in Kingston to accommodate medium density dwelling units, I find this to be irresponsible and completely contrary to the spirit of the environment of that area. It is a violation against all home and land owners in the surrounding area that made their real estate purchase based on the existing environment and is nothing more than an opportunity for the county to increase the tax base. 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. They will drive. Traffic will be a mess. Risk of road runoff into water sources is increased. 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, etc. Sincerely, Mark Vigna	The comment is noted and forwarded to County decision makers.	Email	2.5.5
100	Anita Orban Banks	My name is Anita Orban Banks, I am writing on behalf of the Angeline Orban Estate. The estate owns the Subject Property 172501-1-016-2007 which currently holds the Comprehensive Plan Designation of Urban Industrial. The Estate submitted Reclassification #12 to request a Comprehensive Plan change for the Subject Property from Industrial to Commercial. The Estate supports the County's Recommended Zoning of Commercial that was proposed for Alternatives 2 & 3 regarding Subject Property's account. Thank you.	The comment is noted and forwarded to County decision makers.	Comment form	2.5.5
101	Kirsten Dahlquist	This comment is in reference to the Draft Environmental Impact Statement (DEIS) studies three land use alternatives. Option 2 Compact Growth/Growth Near Urban Centers adequately supports the following issues and Options 1 and 3 do not. Options 1 and 3 should not be selected. 1 - Access to Basic Services: - Affordable housing and efficient public transportation. - Adequate planning and distribution of utilities and infrastructure. 2 - Social Inclusion: - Concentration of cultural opportunities in central areas. - Fostering a sense of community and increased social interaction. 3- Environmental Sustainability: - Reduced environmental impact - Preservation of green spaces. 4- Equitable Access to Opportunities: - Diverse employment and industry - Educational opportunity placement 5 -Reduced Inequalities: - Concentrated resources promoting economic equality.	The comment is noted and forwarded to County decision makers.	Comment form	2.5
102	Gail Sullivan-Bertran	I am not sure that I understand what is going on in Kingston, Wa. I am told they want to make it morelivable by cutting down all the trees! What!!!! That is one of the things that made kingston what it is now!!!	Thank you for your comment. While Kingston is planning for additional growth and development for the 20-year planning horizon (and there are differences between the alternatives in how this is accomplished), cutting down all the trees is not part of that planning.	Comment form	3.1.4
103	Connie Lander	I live near Island Lake and would like to share my input about the Environmental Impact Statement for the Comprehensive Plan. Option #2 is a much better option for the County, as it addresses growth needs but also protects precious rural areas. As a teacher, I am seeing huge issues with children and teens not spending time in nature, which directly impacts mental health. Island Lake is a gem for community members, as it's easily accessible and provides outdoor options for people who can't travel far. Please protect this for generations to come. The Island Lake and Central Valley areas contain vibrant ecosystems. Disturbing these through excessive development has a huge environmental impact on fish, birds, land, and water. Again, please protect this for generations to come. Once an area is disturbed, it is difficult to return it to its original, pristine condition. I am also concerned about the lack of roads leading to this area. Huge amounts of traffic are not feasible for this residential area. I know growth is inevitable, but please consider the option #2 that is least disruptive to people, wildlife, and the environment. Future generations will thank you for making the right decision. Connie Lander 13467 Eldridge Place NW Silverdale	Thank you for your comment. Your feedback on the alternatives will be forwarded to County decision makers.	Email	2.5
104	Heather Wright	I am writing to request that alternatives 2 and 3 no longer include Snyder Park being added to the City of Poulsbo's UGA since the County is retaining the park and is no longer interested in transferring it to the City. Additionally, and as provided in an earlier comment, the City is not in support of any additional land into our UGA, including the almost 10 acres to the northwest of our city limits as proposed in Alternative 3. The City has enough capacity in our city limits to provide for our population allocation and housing targets. Thank you.	Thank you for your comment. Your feedback on the alternatives will be forwarded to County decision makers.	Comment form	2.5

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105	Beth Nichols	EIS Comments. For 2024 Beth Nichols General comment on Draft EIS for Comp Plan: -First of all, how are our public comments being incorporated into this EIS?	Public comments are being indexed and the project team is developing responses in this document. Some of those responses point to changes that will be incorporated into the Final EIS are indicated as such. Other responses stating preferences with regard to alternatives or opinions about mitigation measures or land use changes that distinguish the alternatives will be forwarded to the Board of County Commissioners as they deliberate and select a preferred alternative.	Comment form	n/a
106	Beth Nichols	Critical areas ordinances (CAO) are mentioned widely throughout the Draft EIS as a mitigation mechanism for protecting the natural environment as the County is more widely developed. It is brought up in every section as the mitigation for the unavoidable losses. However, in practice, Kitsap County approves variances to the CAOs routinely, making the CAO useless as a protection mechanism. I wonder if currently any variance is ever denied in Kitsap County to uphold the CAO goals of protection. These CAOS are weak and ineffective and not a true mitigation measure in current practice. Critical areas ordinances, which are currently under review, need to be strengthened with fewer routine variances and NO administrative approval decision options.	Thank you for your comment. Your feedback on variances and administrative approval will be shared with County decision makers.	Comment form	3.1
107	Beth Nichols	Every section of the EIS states "Inevitable loss" - how does this contribute to the mandated goal of NO Net loss?? There must be true use of critical areas protections-- without variances and with full mitigation measures.	Thank you for your comment. You make an important point, which is that planning for growth (which the County is required to do) results in some impacts that are avoidable or that can be mitigated, and some impacts that cannot be feasibly mitigated or offset. The EIS refers to those as "significant unavoidable adverse impacts." Certain aspects of planning for growth, such as increases in greenhouse gas emissions and vehicle miles traveled, can be reduced or offset somewhat by land use and investment decisions guided by comprehensive plan policies, but cannot be completely mitigated. No net loss refers to no net loss of ecological function associated with a critical area. These issues are related but distinct.	Comment form	3.1
108	Beth Nichols	Climate change needs to be more fully addressed in the EIS, especially for water quality and quantity and the importance of tree canopy preservation.	We have integrated climate change across the EIS – specifically GHG emissions associated with different alternatives as well as various climate risks and hazards. The discussion includes various impacts and interactions – such as impacts to streams, temperature, runoff, and recharge. Various proposed policies move beyond this to support climate resiliency within the County, including tree canopy policies and water quality policies (e.g., nutrient loading and ocean acidification interactions).	Comment form	3.1.2
109	Beth Nichols	1.3 Alternatives -Alternative 2 or 3 are given as distinct choices in approach. However, the County Planners say there can be a "mix" of elements of both Alternatives. This is hugely problematic. You can't do both and have a coherent plan. By allowing elements of Alternative 3, Alternative 2 will be undermined. You can't pursue both paths at once: Compact Growth/ Urban Center Focus AND elements of Dispersed Growth Focus. This needs to be corrected: it is an underlying serious fallacy and makes the whole approach faulty and inconsistent. This looks like a loophole to allow dispersed rural development while also intensifying the urban center.	This comment is noted and forwarded to County decision makers. Tree canopy was considered under all alternatives and evaluated by Cascadia as part of their analysis. It is documented as a component of greenhouse gas emissions.	Comment form	2.5
110	Beth Nichols	1.5-3. Water Resources As stated in the EIS, the use of on-site septic systems in rural areas is a major impact on water quality. When these systems fail as they will, there will be potential contamination to water systems. The County doesn't do enough to mitigate this major impact and most homeowners do not know enough about these systems to properly maintain them. There should be a program for all homeowners for education, monitoring, and guidance for replacement for those on OSS, with an impact fee collected. Also this is a strong reason for not allowing more development into rural areas without sewer systems.	Noted. Your feedback on on-site septic systems will be forwarded to County decision makers.	Comment form	3.1.3
111	Beth Nichols	Water quality and quantity needs to be more fully analyzed and addressed. We need more baseline measures of water quality AND quantity. This is fundamental for all in Kitsap County. Do we absolutely have the water quantity and quality to support the population growth targets?	Water quality and quantity baseline data are formulated from the best available current information.	Comment form	3.1.3
112	Beth Nichols	2.4.2 Housing Diversity How are guidelines for meeting the housing targets going to be set? How does the County ensure that permitted housing does accomplish the goal of creating missing middle housing, instead of just adding to more housing geared toward high income earners. Especially in Kingston area where we already have 750 high end homes coming in at Arborwood- we need a primary focus now of middle-income housing. No rezones for high end housing; we don't need more of that kind of housing stock. We need a MORATORIUM on rezone requests for multiple single family home developments, until we meet the target for affordable housing.	An analysis of the housing income allocations with regard to the Housing Element guidance from the Department of Commerce is being included with the revised draft of the Comprehensive Plan. Data from that analysis will be included in the Final EIS after a preferred alternative is selected.	Comment form	2.4.2
113	Beth Nichols	Exhibit 2.5.1 -1 Page 2-16 Major Revisions table – Countywide -Alternative 2- Why no tree retention???? Some level of tree retention needs to be in place for urban areas when possible. Trees in the urban environment are significant mitigation to climate change and decrease heat island effect. This needs to change.	The preferred alternative likely will explore enhanced critical areas requirements and address new critical area buffers, which will increase tree canopy. Kitsap County is also exploring tree retention on land not encumbered by critical areas or their buffers. The EIS was developed with best information available at the time.	Comment form	2.5
114	Beth Nichols	-Alternative 2 states no change in stream buffers ?? This number needs to be guided by the Best Available Science and consistent with Critical Areas Ordinances.	CAO response - The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Comment form	2.5
115	Beth Nichols	2.5.3-1 Population Targets Kingston has already met its growth target with the addition of Arborwood, approx. 750 homes. We do not need to bring on any more units if this is correct.	Thank you for your comment. Other land use changes are included in the alternatives for Kingston because the County must plan not only for overall population growth, but also for enough housing units that are likely to be affordable to all income brackets.	Comment form	2.5.3

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116	Beth Nichols	2-24 Exhibit 2.5.4-1 UGA increase in Alternative 2- Kingston adds 73 acres when growth targets already have been met. WHY?	Thank you for your comment. Other land use changes are included in the alternatives for Kingston because the County must plan not only for overall population growth, but also for enough housing units that are likely to be affordable to all income brackets. Because Kingston is a designated center, it takes a larger amount of growth in Alternative 2 because growth in centers is the focus of that alternative.	Comment form	2.5.4
117	Beth Nichols	3.1.4 Plants and 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 description 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.	The County will review and add detail to the plants and animals impacts as appropriate in the Final EIS.	Comment form	3.1.4
118	Beth Nichols	Continued 3.1.4 This section is where the benefits of a tree and native plant retention policy should be added.	The preferred alternative likely will explore enhanced critical areas requirements and address new critical area buffers, which will increase tree canopy. Kitsap County is also exploring tree retention on land not encumbered by critical areas or their buffers. The DEIS was developed with best information available at the time.	Comment form	3.1.4
119	Beth Nichols	3.2 Land Use. Need to address Farmland in Kitsap County. Needs to be added to the land use section. Benefits of farmland to climate resilience, habitat, local food security. Protection of farmland now is needed for food production options in the future. Agricultural land preservation is paramount to a healthy community.	Noted. The draft comprehensive plan contains numerous policies and strategies to protect farmland	Comment form	3.2
120	Beth Nichols	3.2.2.1 Rural Character: "The rural element of the comprehensive plan must include measures to contain development and protect against sprawl, assure visual compatibility with the surrounding rural setting, protect critical areas, and protect against conflicts with agricultural, forest, and mineral resource uses." How is this being strongly protected? We need a moratorium on rezones of rural lands. This article chronicles past practice of Kitsap County: https://www.theurbanist.org/2024/01/29/kitsap-countys-proposed-comp-plan-sleepwalks-toward-more-sprawl/ "Do what you've always done, Get what you've always got" Rural rezones should be denied. For instance the 400 acre Raydient rezone request on Bond Road would contribute to the same pattern of sprawl and would set a precedent for more development in the rural area. The environmental impact of this rezone would be hugely negative for North Kitsap.	Thank you for your comment. Your feedback on the need for a rural moratorium and the rural rezone will be shared with County decision makers.	Comment form	3.2.2
121	Beth Nichols	3.3 Built Environment: Public Services and Utilities -I am not seeing any 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. In 2023, there was a crisis with overcrowding at St Michael's ER that kept first responders from being able to leave patients at the ER. This is a huge omission in the EIS, and a health services section needs to be added addressing the impact of higher population with an already strained to crisis health system. Talk to the Kitsap County Public Health Department for these additions. https://providers.kitsappublichealth.org/2023/07/kitsap-public-health-board-declares-crisis-in-response-to-high-healthcare-costs-and-inadequate-access-to-services/	The comment is noted and forwarded to County decision makers.	Comment form	3.3
122	Beth Nichols	-Although the Washington State Ferries are under State control / WSDOT, the impact on Kitsap County with higher populations and continued expectation of overburdened ferry service needs to be addressed.	The comment is noted and forwarded to County decision makers. Per Exhibit 3.2.6.2-8, PM peak ferry demand is anticipated to increase by approximately 39 percent by 2040. Long-range capacity and service needs for state ferry routes are identified by the WSDOT Ferries Division in its 2040 Long-Range Plan, (Washington State Ferries, 2019).	Comment form	3.2.6
123	Beth Nichols	-With an increased population located in Silverdale, Kingston, Port Gamble and overall North Kitsap the location of County services in Port Orchard becomes more problematic to citizens. Attending in person meetings, applying for permits, or attending jury duty is a hardship coming from North Kitsap with increasing traffic and time it takes to travel. There is no public transit going directly to the County seat in Port Orchard from North Kitsap, leaving North Kitsap residents less able to access County services. This should be mentioned in the EIS and needs to be addressed for fair representation.	The Kitsap Transit 2022 Long Range Plan identifies additional transit routes, on-demand service areas, micro-transit, and high-capacity transit improvements, some of which provide improvements to the North Kitsap area. This comment is noted and forwarded to County decision makers.	Comment form	3.2.6
124	Beth Nichols	Zoning 17.420.060 Lot aggregation in the Suquamish LAMIRD- removal of requirement for multiple existing lots to aggregate. This should not be removed, there is an environmental benefit to encouraging larger lots in this area that is too heavily built without being a UGA. Address the difference between the two.	Thank you for your comment. Your feedback on lot aggregation in Suquamish will be forwarded to county decision makers.	Comment form	2.5.5
125	Robin Salthouse	Hi, I'm writing to restate my opposition to the county adopting the Alternative 3 to the 2024 Comprehensive Plan for the following reasons: 1. It opens the rural areas of Kitsap County to sprawling development and damages the environment, recreational opportunities and wildlife habitat including the vital salmon habitats.	Thank you for your comment. Your feedback on the alternatives will be forwarded to County decision makers.	Email	3.1
126	Robin Salthouse	2. It does nothing to address the need for affordable housing in the North Kitsap area, instead it allows development of expensive housing that exceeds the areas projected growth requirements (the areas growth is not exclusively in the high income demographic that can afford houses on 2 - 5 acres).	Thank you for your comment. Your feedback on the alternatives will be forwarded to County decision makers.	Email	3.2.3
127	Robin Salthouse	3. The proposed "Bond Road" re-zone will adversely affect traffic and public safety. Jon Rose from Raydient admitted that traffic was a problem that needed to be solved at a recent public meeting. 1. None of the various road junctions - Stottlemeyer/Bond, Minder/Bond and Port Gamble NE/Bond and and the proposed entrance to the re-zoned area, lend themselves to safe entry to Bond Road and this cannot be solved without major re-work - a single traffic light or rotary will not work. 2. Bond Road is State Road 307. Any re-work would need to be approved by the State and come out of the State budget. 3. Addition of the proposed Regional Sports Complex (Kingston Rotary), The YMCA and a restaurant that are muted would only serve to increase the traffic problems. By the time these projects are realized (if ever) and the traffic safety issues become critical the developers will be long gone and all the burden will fall on tax payers. Note the rotary in Poulsbo on the SR305 cost around \$20M!	Note: Exhibit 3.2.6.1-6, Bond Road is not shown as deficient under existing conditions, or under Alternative 1, 2 or 3 conditions as shown in Exhibits 3.2.6.2-4, 3.2.6.2-5, 3.2.6.2-6 respectively. Any future EIS work in this area would need to be considered on a separate basis.	Email	3.2.6

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128	Robin Salthouse	As a side note regarding the sports complex/YMCA; the Kingston Village Green took around 15 years from concept to opening and was probably a much easier and less costly enterprise than turning 20 acres of hills into flat sports fields with lights and player facilities. The Silverdale YMCA cost \$11M in 2011\$. It is hard to see how either project will go forward in the next decade. These projects are being used as "emotional support" by Raydient to gain public support for their re-zoning request. Comp Plan Alternative 2 is the one that should be supported. It allows retention of the rural areas and encourages appropriate growth in the current UGAs.	The comment is noted and forwarded to County decision makers.	Email	2.5
129	David Pedersen	Good evening Commissioners: My name is David Pedersen, each of you have been given six document packets that have been highlighted which indicate the most important points of concern to the rural community of North Kitsap. Those packets include examples of what is happening now to our power grid, and disappearing water supply. Also is a packet from NKU's traffic analysis and summary pages from Kitsap County's DEIS that confirm our county's infrastructure is in need of being updated. In the February 2024 Community News, an article stated, "over 1 million ride KT ferries in '23; WSF continues reduce service, "which leaves all kinds of traffic issues in Kitsap County. After reviewing all these documents, I see a common thread, our infrastructure is being used to its limits. These last few weeks on the police scanner, a sheriff told the call center, "we will get to it when we can" on several occasions. From Jan. 13 to 23rd St. Michael's during the cold snap was turning away ambulances because it was filled to capacity. The Commissioners recently agreed to budget \$3,176,000 to repair a septic system currently in use in Bremerton. All of these situations are leaving me very concerned about application ID 72 being approved because it will only exasperate the current conditions such as traffic congestion/safety and water quality/quantity in an already fragile environmental biosphere. Why isn't Kingston Rotary trying to fix up the existing play fields in Kingston, rather than partnering with a timber investment company making large profits off of property zoned in a rural wooded environment? The Rotary has full knowledge that this application does not comply with the GMA. Community responses of opposition from the Mayor of Poulsbo, and S'klallam and Suquamish Tribes, and many of the 840 members of Facebook's Stop Raydient Rezone group, have been submitted to the Commissioners. There is no fate but that fate, which we create for ourselves and the Commissioners are our last hope for a vision of a rural life that is being preserved in accordance with the GMA.	Thank you for your comment. Your feedback on land use and the rural rezone will be forwarded to County decision makers.	Letter	Multiple
130	David Pedersen	Climate change is no longer a discussion of topic. Please note the index for WA State. No yellow markers for N.W. WA. Climate change is affecting the entire country. San Diego, got 6 months of rain in 4 hours causing serious flooding, dumping at least 4 billion gallons of rain for the area, while we + the East Coast, are drying up + experience a major lack of snow + ice.	We have included climate change discussions because of County priorities and state guidance. There are documented climate impacts and risks for Kitsap County from multiple lines of evidence, and we have referenced those in the foundational documents that the EIS relies upon. The Cascadia documents referenced in the DEIS document climate data that applies regionally.	Letter	3.1.2
131	David Pedersen	This map has been designed by Rickeckert rezone would likely accelerate Bond Rd in to a commercial corridor. In directly conflict with rural GMA guidelines!.	Note: Exhibit 3.2.6.1-6, Bond Road is not shown as deficient under existing conditions, or under Alternative 1, 2 or 3 conditions as shown in Exhibits 3.2.6.2-4, 3.2.6.2-5, 3.2.6.2-6 respectively. The comment is noted and forwarded to County decision makers. Any future EIS work in this area would need to be considered on a separate basis.	Letter	3.2.6
132	David Pedersen	What strip mall?	Thank you for your comment. This is in reference to a traffic impact analysis – and not directly related to this EIS. This comment has been forward to other applicable County staff for review.	Letter	n/a
133	Betsy Cooper	Thank you for the opportunity to comment on the Draft EIS prepared for the consideration of the 2024 Kitsap Comprehensive Plan Update. Below please find my comments on the EIS:Page 20 (1-2) (also page 54) - 1.1.3 – Location – while this document must focus only on County land and land use, it is not correct that the Cities Comprehensive planning activities should not inform and be considered in this EIS. If there are significant changes proposed for Poulsbo, Bremerton, or Port Orchard they may affect traffic, infrastructure, or recreational planning done by the county. Also, annexations proposed or anticipated in the near future would reduce the rural area the County is responsible for and thus make continued 'dispersed development' even more undesirable. I believe that the results and potential impacts of the City's planning should be discussed in this document, to the extent that it may change impacts or decisions being considered by the County and the effects on future CFP planning and rural preservation. Please add references and information in the final EIS.	Thank you for your comment. While it is indeed true that jurisdictions make decisions that impact neighboring jurisdictions in their comprehensive plans, it is not within the scope of this EIS to study the impacts and mitigation for all the cities because the cities are governed by their own comprehensive plans – the County does not have planning jurisdiction there, and vice versa.	Email	1.1.3
134	Betsy Cooper	Page 21 (1-3) – Phasing – the reference here and later in the EIS mentions that this is a 'phased review'. Please explain or give examples of actions that would warrant a 'narrower' or specific review after this non-project EIS level review is complete.	As a non-project planning proposal, the different alternatives broadly anticipate adverse impacts and cumulative impacts. Specific uses are not analyzed in this use as the EIS analyzes all potential uses in a given area/zone and potential impacts that could occur. However, subsequent SEPA analysis will still be needed for project-specific proposals that exceed SEPA Categorical exemptions.	Email	1.2.3.1
135	Betsy Cooper	Page 24 (Exhibit 1.5-1 and throughout the document) – The Critical Areas Ordinance is cited as a regulation that will a moderator of impacts to natural resources and a check on impacts. However, the CAO is under revision and there are many changes that are still being considered. The fact that this regulation is in flux should be stated clearly in the EIS and perhaps a summary of the changing aspects of the CAO should be presented to more accurately indicate what aspects of these regulation can affect impacts to water resources, sensitive areas, etc.	The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Email	1.5
136	Betsy Cooper	Page 25 (1-7) – Exhibit 1.5 1 Earth Impact Summary – as will be commented on later in the Earth Section, the Earth impacts section is missing shoreline zone impacts that should be included in this section as well as Climate Change.	The earth impacts in shoreline zones are not expected to change from alternative to alternative. The Final EIS will contain more summary of climate change impacts in each impact category.	Email	1.5
137	Betsy Cooper	Page 28/29 (1-8) 1.5.3 – Water Resources Impacts Alt 3 - I am glad to see the impacts quantified for nonfish bearing stream, since Alt 3 carries clear significantly more impact (5-10X). However, 'fish bearing' stream impacts were not mentioned in this document. I would request that a similar analysis presented, if possible, on Fish-bearing streams. One other aspect of stream and wetland effects was not presented, the potential for additional buffers area losses that is allowed by the buffer averaging regs already in place. Could buffer averaging losses be estimated, and if not at least mentioned?	The extent of impacts to fish-bearing streams will be quantified in the Final EIS where possible. Buffer averaging is site- and proposal-dependent, so it is not possible to quantify in a countywide non-project EIS.	Email	1.5
138	Betsy Cooper	Page 29 (1-9) also in Water Resources Impacts and elsewhere in the document, the ACOE are mentioned as regulating Wetlands. While this is still correct for contiguous wetlands, the agency has recently lost the ability to regulate small, disconnected wetlands so the general statement you have about the Corps jurisdiction should be modified to reflect this reduction in jurisdiction. It could also be stated that if 2 these small wetlands are not identified and regulated by the County or State that more wetland loss is an unmitigated impact in the future.	The analysis of wetland resources impacts will be updated in the Final EIS.	Email	1.5

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139	Betsy Cooper	Page 31 (1-11) – Alt 3’s proposed buffer widening mitigation should be considered to be added to any eventual hybrid Alternative. This is an important measure and would have the potential to offset the inevitable losses of small non-contiguous wetlands that will result from the loss of ACOE jurisdiction.	Thank you for your comment. Your feedback on the alternatives will be forwarded to County decision makers.	Email	1.5
140	Betsy Cooper	Page 32 (1-12) – SW BMPS – I also strongly recommend that the County include in any final alternative that stronger BMPs for Water Quality improvement be part of Stormwater building or maintenance in the County. While adding expense it will be very important to the future of Kitsap’s stream and nearshore health.	Thank you. Your feedback on additional BMP-based mitigation will be forwarded to County decision makers.	Email	1.5
141	Betsy Cooper	Page 33 (1-14/15) 1.5-5 – Land and shoreline – The summary does not include Sea Level Rise expected in the coming years. This will result in changes to shoreline development potential and thus there will be adverse impact on the shoreline if the SMP is not changed to include policies and permit requirements to address these effects when developing in the shoreline zone.	Sea level rise is anticipated to affect all the alternatives equally across the county. Unfortunately, modeling is out of date for sea level rise quantification.	Email	1.5
142	Betsy Cooper	Page 34 (1-16) Plans and policies – This summary page and later in the document, Alt 3 is described as including removal of lot aggregation requirements. What are those requirements and what would be the effect of removing of those requirements? This should be described rather than just stated.	Thank you for your comment. A description of lot aggregation requirements and what removing them would do will be included in the Final EIS, including in the preferred alternative if that is included by the Board.	Email	1.5
143	Betsy Cooper	Page 38/39 (1-20) 1.5-9 Transportation Summary – Later in the Transportation Section the LOS for each state roadway is shown to be barely adequate now. The fact that the State Roadways are North Kitsap’s major arterials and their conditions in the next 20 years must be considered when loading population to the North of Kitsap. Also, the effect on freight transport from the Kingston Ferry Terminal to South and on to the Olympic peninsula is threatened by inaction for planning and improving LOS on these roadways. Here too is where knowing what Poulsbo City Comp Planning is anticipating must be considered by Kitsap County now.	Note: Deficient roadways under Alternative 1, 2 or 3 conditions are illustrated in Exhibits 3.2.6.2-4, 3.2.6.2-5, 3.2.6.2-6 respectively. The County has ongoing coordination with WSDOT and cities to identify and fund improvements to state highways. Ultimately, state highways fall under WSDOT jurisdiction regarding when/where improvements are made.	Email	1.5
144	Betsy Cooper	Page 44 (1-26) Recreation – The EIS does not acknowledge or identify the current lack of adequate active recreation facilities in the current (no Action) condition. Also, it states the PROS Plan will address this issue. Will that information be in hand by the Final EIS? The current degraded conditions of the existing facilities, and a cost estimate for the improvement of the existing facilities and a plan for the future is vital for North Kitsap and I am sure for all of Kitsap. Please add this information in the final EIS.	The final PROS Plan will be included in the FEIS. Consideration of adequate recreation facilities will be mentioned.	Email	1.5
145	Betsy Cooper	Page 47/48 (1-29/30) 1.5-18/19- Wastewater and Stormwater – This planning effort should include a new way to generate or allocate funding to these vital Capital Facilities so that the strategy for new facilities is not solely on the shoulders of developers. Impact fees will always go up but heaping all the burden on development is slowing residential and commercial growth in Kitsap. The mitigation measures should be strengthened to acknowledge the need for new County funding of needed infrastructure.	The comment is noted and forwarded to County decision makers.	Email	1.5
146	Betsy Cooper	Page 62 (2-10) Definition of Countywide Centers is vague at best and is difficult to distinguish from Regional Growth Centers. It is concerning that since Kingston is designated ‘countywide’, but Silverdale and Bremerton are ‘regional’ the badly needed transportation, transit and road infrastructure funding may go to them over Kingston in all cases. Also how do Kingston and McWilliams/303 in any way relate or resemble each other? Why were they the only Countywide centers designated? How are their needs or characteristics similar?	Centers designation is guided/required by Puget Sound Regional Council (PSRC) centers designation criteria, which are part of plan certification by PSRC that is required to access federal transportation funding for County projects. VISION 2050 and other PSRC documents contain detailed information on this, but essentially, jurisdictions are supposed to focus planning for a certain percentage of their growth in regional growth centers and have the zoning and infrastructure investments to match. Regional growth centers are designated by PSRC. Countywide centers are designated by jurisdictions and can serve different purposes or be designated for different reasons, but their designation raises their profile for investment, although they are not expected to take as much growth as regional growth centers.	Email	2.3.2
147	Betsy Cooper	Page 69 (2-17) SEPA Flexibility Thresholds – What does “increase SEPA Flexibility Thresholds” mean? What is the E-pacer Program? These mechanisms need to be explained and their actual effects on development should be clarified so that their effects can be understood.	The Washington Administrative Code, which contains the SEPA rules, contains flexible thresholds within which communities can choose to set levels at which different types of development are exempt from SEPA review. Please note that there are well-defined cases where an exemption cannot and will not be granted. Information on the E-pacer program will be included in the Final EIS.	Email	2.5.1
148	Betsy Cooper	Page 71 (2-19) Kingston Storefront Zone – How was this storefront zone size decided upon? It appears larger than any proposal received by the County. This proposed Storefront zone is wholly too large. It would put pressure on the potential for multifamily residential development to occur throughout the zone but particularly in the newly proposed area along Lynvog. The document is correct to state that such a ground floor commercial requirement would be (as it was when it was first implemented for the first 8 years) detrimental and a barrier to development in the Kingston Core.	Thank you for your comments. The storefront alternative currently considered in Alternative 3 and the Board will determine if it will be included in the preferred alternative. The purpose and size of the overlay has been in discussion with Kingston Stakeholders, KCAC, and Port of Kingston.	Email	2.5.1

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149	Betsy Cooper	Page 72 (2-19) Mc Williams/303 appears to be a carved-out section of the Rt 303 Highway Commercial zone and not in any way resembling Kingston. Thus, Kinston should not be the same overlay 'countywide center'. Reclassification proposal #72 – As part of Alternative 3 the reclassification of a 200-acre rural wooded area is proposed to be reclassified to rural Residential. That Reclassification should not be included in any action by the County. It wholly goes against the GMA effort to maintain rural character. I have also recently learned that the Port Gamble S Klallam Tribe is planning to remove a large area of land from the Rural Wooded category. Since the uses they may propose for these lands are not known at this time this action would further diminish the rural wooded area in North Kitsap. And since the rural areas are continuing to be developed at a greater rate than would be supportive of the basic GMA tenants of maintaining rural character, there is no justification for granting such an upzoning of the Raident property. Exhibit 2.5 3-2 Employment Growth Targets – The figures for Poulsbo appear to be extremely low and should be checked. Is this only for a small area that is to be annexed? Also, on this topic the Alt 3 is described to meet and exceed the employment targets but how that would occur – what additional employment-producing elements yield this conclusion is not clear. Please expand on this in the EIS.	<p>As noted above, Centers designation is guided/required by Puget Sound Regional Council (PSRC) centers designation criteria, which are part of plan certification by PSRC that is required to access federal transportation funding for County projects. VISION 2050 and other PSRC documents contain detailed information on this, but essentially, jurisdictions are supposed to focus planning for a certain percentage of their growth in regional growth centers and have the zoning and infrastructure investments to match. Regional growth centers are designated by PSRC. Countywide centers are designated by jurisdictions and can serve different purposes or be designated for different reasons, but their designation raises their profile for investment, although they are not expected to take as much growth as regional growth centers.</p> <p>Your feedback on the reclassification request will be forwarded to County decision makers.</p> <p>Alternative 3 has more employment capacity because of the draft land use changes resulting in more commercial and industrial land becoming zoned for those uses.</p> <p>Poulsbo's employment capacity will be reviewed and checked as part of the Final EIS.</p>	Email	2.5.2
150	Betsy Cooper	Page 93 (3-11) Earth Impacts – While the statement “the assigned land use designations and zoning classification do not generate impacts themselves” may generally be true, one aspect of land designation is not being fully addressed - the potential for new and changing shoreline effects as sea level rises and storms intensify. These effects will not be felt by all zoning designations. The Final EIS should acknowledge this. The County should add a section to the SMP updating permit requirements for development along the shoreline, and a mitigation measure in document should call for that review and revision.	<p>Noted. Sea level rise is anticipated to affect all the alternatives equally across the county. Your feedback on the SMP will be forwarded to County decision makers for potential consideration in the next SMP update.</p>	Email	3.1.1.2
151	Betsy Cooper	Page 122 (3-41) Exhibit 3.1.3.1-2 shows only limited coverage of streams. There is no mention of important North Kitsap lowland streams. Also, this section should mention shoreline vegetation (eelgrass) and forage fish populations areas. These resources have been shown to be affected by landbased development and thus should be mentioned in the EIS.	<p>The Final EIS will contain more stream coverage where possible, although we are limited by the best available mapping and typing of streams, and not all streams are mapped or accurately typed. Shoreline vegetation and forage fish population areas will be mentioned in the Final EIS.</p>	Email	3.1.3
152	Betsy Cooper	Page 128 (3-45/46) – Lake list does not mention Carpenter Lake. It is important that this unique bog environment, rare in Kitsap, be included in the list of lakes, as well as any other bogs in Kitsap.	<p>Carpenter Lake and other bogs will be added to the lake list in the Final EIS as appropriate.</p>	Email	3.1.3
153	Betsy Cooper	Page 130 (3-49) – WQ Section should include a link to all the waterbodies that are listed as impaired by some constituent for example, Carpenter Creek is listed for Fecal Coliform. Mentioning all the listings is 4 important to correctly characterize these existing conditions. Such a figure or list should be available from the Dept of Ecology.	<p>Links to impaired water bodies will be added to the Final EIS as appropriate.</p>	Email	3.1.3
154	Betsy Cooper	Page 148 (3-68) – rare plants – as noted above, 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.	<p>Bog plants will be mentioned in the section on rare plants as appropriate in the Final EIS.</p>	Email	3.1.4
155	Betsy Cooper	Page 148 (3-67/8) – Bear, cougar, and coyote should also be mentioned as being present in North Kitsap woodland areas. And as a consequence of development the bear's habitat is certainly being reduced. These effects could be expected to be greater in Alternative #3.	<p>The County will take a closer look at larger predator presence in North Kitsap County and update the Final EIS as appropriate.</p>	Email	3.1.4
156	Betsy Cooper	Page 151 (3-70) – estuarine nearshore habitat – There should be mention of the fact that in several places throughout the County that significant restoration investment has been made in areas to regain more natural conditions (e.g. Carpenter Creek; Clear Creek; Harpers creek) and these areas are in the process of enhancing the estuarine ecosystems in these areas.	<p>Recent restoration efforts and investment will be acknowledged in the Final EIS.</p>	Email	3.1.4
157	Betsy Cooper	Page 152 (3-70/71) Marine Nearshore habitat – the data for land cover is from 2013 and the other data is from much older references. Unfortunately, it is possible that statistics of tree cover and other vegetation are out of date. Unless they can be verified as still correct, I suggest they be removed or caveated in some way. Habitat section – while fish species in the intertidal and in the estuary are covered well in this document, there is no reference to Eelgrass coverage along the Kitsap shoreline and Kelp Forest areas (some restoration areas that exist). These are important components of the marine nearshore environment along the Kitsap shoreline and should have some mention in the document. Since runoff from new development, or intensified land uses in or near these areas could affect their patchiness, it is important they be mentioned. Also, the WRIA 15 Plan is cited as an important tool to direct action and achieve improvement in habitat and water quality. However, the WRIA plan is not an approved plan, and its initiatives are certainly not fully funded. Therefore the description of this plan and its use in this EIS should be revised to clearly note that it is not fully approved or funded.	<p>Land cover data are limited by best available information.</p> <p>Eelgrass and kelp forest coverage will be listed as appropriate.</p> <p>WRIA 15 will be noted as unapproved in the Final EIS.</p>	Email	3.1.4
158	Betsy Cooper	Page 167 (3-83) – Mitigation for shoreline affects – a mitigation again could be added here that speaks to a revision of the Shoreline Management Program that incorporates increase protections for nearshore areas from development and climate-related degradation with development.	<p>The County will consider additional potential mitigation in the SMP for consideration in the Final EIS.</p>	Email	3.1.4.3

DEIS Public Comment Response Matrix

#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
159	Betsy Cooper	Page 169-70 (3-2) – Centers designations – the distinction between regional centers and countywide centers is not clear. Why is Kingston a Countywide Center? How are its characteristics the same as the other area in that category? While it is important that Kingston be eligible for grants or other programs that can support transit, housing, road, ferry improvements, it is not clear why Kingston is distinguished differently than the regional centers (e.g. Silverdale). These distinctions should be explained in the Final EIS or Kingston may need to be reclassified.	As noted above, Centers designation is guided/required by Puget Sound Regional Council (PSRC) centers designation criteria, which are part of plan certification by PSRC that is required to access federal transportation funding for County projects. VISION 2050 and other PSRC documents contain detailed information on this, but essentially, jurisdictions are supposed to focus planning for a certain percentage of their growth in regional growth centers and have the zoning and infrastructure investments to match. Regional growth centers are designated by PSRC. Countywide centers are designated by jurisdictions and can serve different purposes or be designated for different reasons, but their designation raises their profile for investment, although they are not expected to take as much growth as regional growth centers. Kingston is designated as a countywide center due to the presence of the ferry terminal and State Route 104, which connects Kingston (and thus northern Kitsap County) with the rest of urban Puget Sound.	Email	3.2.1.1
160	Betsy Cooper	Page 188 (3-20) – While the 2016 subarea plan may have mentioned the potential for Kingston to incorporate, there is no determination at this time that such an incorporation is reasonable or feasible during the next 20 years. This statement should be revised to say that Kingston, like all UGA's, are slated at some time to be incorporated.	Language on incorporation of UGAs will be refined in the Final EIS.	Email	3.2.1.2
161	Betsy Cooper	Page 195 (3-28) – Plan consistency – This section notes that jurisdiction's plans much be consistent. Here this EIS may fall short of evaluating all the impacts of these alternatives without being aware of, and considering, the effects of the plans of Poulsbo, Port Orchard and Bremerton. While it is understandable that the County needed to prepare this plan in time for a timely review by all, it should however share the important components of these Cities updates as well in the Final EIS so that all effects on Transportation, recreational planning, transit, changes can be assessed on County proposals.	Thank you for your comment. While it is indeed true that jurisdictions make decisions that impact neighboring jurisdictions in their comprehensive plans, it is not within the scope of this EIS to study the impacts and mitigation for all the cities because the cities are governed by their own comprehensive plans – the County does not have planning jurisdiction there, and vice versa.	Email	3.2.2.1
162	Betsy Cooper	Page 197 (3-30) – Regional Center designation vs Countywide designation – the distinction between these two centers in vague at best. If there are differences in requirements and expectations, then they should be more thoroughly explained. Kingston has been listed as an HCTC, and has been given additional population and employment requirements, because of that designation but, it may not be able to effectively compete for transportation funding against these other Regional Centers. The distinction between these two zones and the attendant benefits and requirements should be clarified or Kingston should perhaps be designated a Regional Center.	Thank you for your comment. As previously noted, regional centers are designated by PSRC. Kingston is a HCTC, or High Capacity Transit Community, by virtue of its presence on the Washington State Ferries system. If PSRC were to designate Kingston as a regional growth center alongside Silverdale, it would be expected to take a much higher share of projected growth than is currently the case.	Email	3.2.2.1
163	Betsy Cooper	Page 260 (3-93/4) – Visual Character - Kingston – I would request that the photographs Exhibit 3.2.5.1 – 4 and narrative for Kingston be revised the Old Town component do have a storefront area and Kingston does also have enforceable design standards that focus on a small-town maritime feel. This narrative does not reflect those aspects and the images are not representative of the town in any way. A picture of the downtown core showing the building type would be more illustrative.	Narrative revisions and alternate pictures will be considered as part of the Final EIS.	Email	3.2.5
164	Betsy Cooper	Page 269 (3-102) Kingston section should be revised to mention the stairstep nature of the UVC zoning that preserves light and views for the Downtown main streets. It also incorrectly states (However, commercial zoned areas will have an increased maximum height of 50 feet.) This would be allowed only in a stairstep manor and for roof peaks.	Noted. The stepdown of the UV zoning will be described in the Final EIS.	Email	3.2.5.2
165	Betsy Cooper	Page 272 (3-105) The impacts listed under Kingston Alt #3 neglect to present the significant light and visual changes a 55ft building height allowance would cause in the main street in Kingston, creating a canyon effect, significant loss of light and views of the water, the key aspect of the towns appeal. This effect should be stated in the Final EIS.	Additional language referencing the aesthetic impacts of increased height limits in Kingston will be included in the Final EIS.	Email	3.2.5.3
166	Betsy Cooper	Page 273 (3-105) - Exhibit 3.2.5.3 -1 While this table is a summary of the whole county, in Alt 3 the significant change in the light, visual effects and character of potentially creating 55' buildings on either side of Main Street in Kingston, where those heights and canyon effects exist in no City in Kitsap, should be highlighted. This would be a significant change to Light, shadow and view corridor.	The table will be revised to include more information about the aesthetic impacts of potential increased height limits in the Final EIS.	Email	3.2.5.3
167	Betsy Cooper	Page 307 (3-136) – Ferries – While the data on ridership is great and well presented, there is no data presented regarding vehicles and particularly the truck and commercial vehicles that the ferries carry. This is particularly important information regarding planning for roadway capacity. A key aspect of the Kingston Ferry run is that it carries the most commercial vehicles of any part of the WSF system and the need to plan for those vehicle movement is crucial. Therefore, it should be discussed, and future 6 planning should consider the increase in these vehicles and their effects on LOS on County and State roadways.	Exhibit 3.2.6.2-8 shows the projected 2040 demand for both walk-on passengers and vehicles/drivers for ferries in the Kitsap service area during the PM peak. Long-range capacity and service needs for state ferry routes are identified by the WSDOT Ferries Division in its 2040 Long-Range Plan, (Washington State Ferries, 2019).	Email	3.2.6
168	Betsy Cooper	Page 312 (3- 140) – Pedestrian – This section is written in a way that currently seems to indicate that there are adequate and safe shoulders on roadways for pedestrians in the UGAs. Kingston, and perhaps other areas in the County, do not have adequate pedestrian ways. Therefore, the existing conditions sections and the no Action should be amended to state this clearly and mitigations measures should be noted in all alternatives that pedestrian ways development is needed to meet reasonable consistency with Urban service requirements.	The Plan does not claim that adequate and safe shoulders are present along all roads in the UGAs. The Plan discusses the impacts of the proposed alternatives on non-motorized modes of travel, and the resulting increased demand for non-motorized facilities. The majority of projects in Exhibit 3.2.6.3-1 focus on non-motorized needs throughout the County.	Email	3.2.6.2

DEIS Public Comment Response Matrix

#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
169	Betsy Cooper	Page 318 (3-150/151) – Transportation/Roadway impacts - In seems the methodology used here is flawed. The way the sections of the county roadways deficiencies are lumped together, and averaged significantly minimizes deficiencies in serve, rather than highlight deficiencies. For example, in Kingston’s UGA, all the major arterials corridors (state Rt 104 and Miller Bay) leading to and from the UGA are currently nearing or are significantly deficient. Averaging these deficiencies with all other county roads dilutes these impacts and seems to bring under 15 % and thus achieves consistency. This approach must be revised in the Final EIS to more accurately highlight the pinch points and issues for roadway LOS for the next 20 years. Analyzing the arteries alone associated with UGA could be one approach. Also discussing their conditions’ impacts on commerce and presenting them would also be important and illustrative planning challenges. Also, one example of a missing component in the North Kitsap area is NE 288th St, which runs between Hansville rd. NE and St Highway 104. This roadway is a narrow, curvy two-lane road without shoulders that is used by many to avoid the stretch of Bond Rd (also called SR 104) from the Miller Bay/Hansville highway intersection where it becomes St route 307. This stretch is regularly busy with offloading of ferry traffic from Kingston that heads south and to the Olympic peninsula. Since that stretch is often congested, and the NE 288th St is a straighter, alternate route to RT104 for many leaving The Point Casino, it is used heavily, particularly at night. This has resulted in property damage (loss of many mailboxes) and many visits by law enforcement. While there have not been fatal accidents as yet, the area is not safe for pedestrians to walk. This is an example of another type of deficiency not identified in the EIS and not taken into account in the current analysis of consistency.	Note: Deficient roadways under Alternative 1, 2 or 3 conditions are illustrated in Exhibits 3.2.6.2-4, 3.2.6.2-5, 3.2.6.2-6 respectively. SR 104 is not noted as deficient under any future alternative. The County has ongoing coordination with WSDOT and cities to identify and fund improvements to state highways. The comment is noted and forwarded to County decision makers.	Email	3.2.6.2
170	Betsy Cooper	Page 326 (3-159) Exhibit 3.2.6.3.-1 roadway improvements – This table should include shoulder widening for Barber Cutoff Rd and South Kingston Rd for pedestrian safe and recreational opportunity. For existing and both alternatives.	The comment is noted and forwarded to County decision makers.	Email	3.2.6.3
171	Betsy Cooper	Page 402 (3-235) – Stormwater Infrastructure – an additional mitigation measure that could be added would be to require additional SW WQ remediation for all road projects.	The comment is noted and forwarded to County decision makers.	Email	3.3.8
172	Betsy Cooper	Page 413 (3-246) Impacts on Telecommunications – This section did not describe any of the deficiencies and inequities demonstrated by the pandemic when online school was not supported equally throughout the county. Kingston and North Kitsap had significant areas where internet was not adequate and as reported in this section, the communication companies do not intend to improve availability. This is a critical impact to residential and commercial as it grows. This issue should be acknowledged and quantified in the Final EIS.	An expanded description of emergency impacts on Telecommunications under current alternatives will be noted and forwarded to County decision makers.	Email	3.3.10.2
173	Beverly Parsons	As you work on the EIS draft, please carefully read the recent article from the Kitsap Daily News to look at the implications of the EIS work: https://www.kitsapdailynews.com/news/grouptribes-opposed-to-proposed-nk-sportscomplex/	The comment is noted and forwarded to County decision makers.	Comment form	n/a
174	Joe Crell	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.	The comment is noted and forwarded to County decision makers.	Comment form	n/a
175	Emily Froula	Dear Commissioners: I am writing regarding the draft EIS on the 2024 Comp Plan. I support Alternative 3, for the reasons I will discuss. I speak not only as a resident of Kingston, but also as a Rotarian working hard to bring muchneeded sports fields to our community. Active recreation facilities have been consistently overlooked in North Kitsap and, while my family enjoys and regularly uses the wonderful parks and trails that have been created, the need for active recreation has consistently failed to be addressed. Although some projects, such as Poulsbo Events and Recreation Complex (PERC), address small aspects of the need, no other proposed project sufficiently addresses the need for such facilities in North Kitsap, nor do they cumulatively address the need for the current population, let alone the future growth. North Kitsap, and especially Kingston, has extremely limited land within or adjacent to any proposed UGA boundaries. There is likely not enough land to fulfil the housing needs, let alone address the need for active recreation facilities. Additionally, it is my opinion that the limited land is better suited to providing housing, and especially affordable housing, for families and commercial space for small businesses closer to town centers and public transportation. Using the limited land for active recreation, which requires significant acreage, would further put pressure on our ability to provide enough housing and commercial support for the predicted growth. With land within the Kingston UGA so limited, it is my opinion that alternative 3 of the Comp Plan can best provide the space for all necessary housing, while allowing affordable housing to be concentrated around urban growth areas. Additionally, allowing for small clustered housing developments in rural North Kitsap, such as the Raydient rezone, the county can better address environmental concerns by coordinating things such as stormwater retention and septic design for a neighborhood rather than each dispersed house being responsible for their own. It is my opinion that this can also be done in a way that maintains the rural feel of non-urban North Kitsap. Setting these neighborhoods back and obscured from major roads, requiring wildlife corridors and green belts, etc. can minimize the urban feel of such communities and help them blend in with rural North Kitsap, yet still provide additional housing to meet the growth targets. Although I’m aware that this is not the topic of the Comp Plan itself, our proposed sports complex project is highly dependent on Alternative 3 being chosen or the rezone at the Raydient site off of Bond Road being addressed separately. Simply put, there is no other flat, dry land that we are aware of that is adequate for such a project in North Kitsap. We have done significant research and continue to look (unsuccessfully) for alternative sites should this rezone fail. If we let this opportunity pass, North Kitsap may never be able to deliver the facilities that can provide the space for our youth to play sports, our seniors to stay active, and all community members to enjoy active recreation within North Kitsap. Thank you for your time and consideration. Sincerely, Emily Froula	Thank you for your comment. Your feedback on the alternatives will be provided to County decision makers. Please note that with regard to a sports complex, the County is merely evaluating land use category change and associated environmental impacts, not the actual, specific use that would be proposed on a site.	Email	2
176	Donald Fenton	Comments on Draft Environmental Impact Statement Dated December, 2023 After reading the entire Draft Environmental Impact Statement (DEIS) prepared for the 2024 Comp Plan it is clear the least environmental impact of the three alternatives is Alternative 2. According to the statement Alternative 2 will achieve the housing targets and nearly meet the employment targets for 2044. Alternative 1 as stated on page 2-11 does not meet growth targets for population, housing, or employment. Alternative 3 as stated on page 2-13 exceeds employment targets and accommodates less population (housing) growth than Alternative 2. I would like to see Tree Retention in some form incorporated into Alternative 2 rather than only Tree Replacement to help protect vital environmental concerns with the loss of an entire tree canopy on future developed properties. This should be addressed in the final EIS. Most of my following comments have to do with the environmental concerns with the expansion of the Silverdale UGA into rural properties in Central Valley that were considered in the DEIS. This specifically is the East 75 acres of the former Crista Camp property and the 20 acre tract immediately south of that property being the Courter Farm.	Thank you for your comments. Your feedback will be forwarded to County decision makers. The preferred alternative likely will explore enhanced critical areas requirements and address new critical area buffers, which will increase tree canopy. Kitsap County is also exploring tree retention on land not encumbered by critical areas or their buffers.	Letter (via comment form)	2
177	Donald Fenton	• Seismic Hazards – Silverdale Subarea page 3-11: “Erodible soils are found along the Dyes Inlet and some creek drainage corridors associated with Clear Creek, Strawberry Creek, Steele Creek, and Barker Creek.” Comment: Barker Creek traverses the properties noted above. As these soils are disturbed by development they will become prone to contaminate the creek with turbid run-off. This may occur both during development and after. Barker Creek is a fish bearing creek including salmon and cutthroat trout which are affected by turbid waters.	Additional context on Barker Creek will be incorporated into the Final EIS.	Letter (via comment form)	3.1.3
178	Donald Fenton	• Water Resources (Surface and Ground) page 3-37 “ The quantity and quality of surface water also directly affects the extent of flooding and amount of groundwater recharge. Maintaining groundwater recharge is imperative for the residents of Kitsap county, as groundwater is the only source of drinking water outside of Bremerton’s public water supply service area. Groundwater also contributes to base flows of streams, provides direct input into lakes, aids in the prevention of seawater intrusion, and other related benefits.” Comment: As stated in a later citation, the Island Lake Aquifer is a Category I aquifer and as such is susceptible to contamination. The properties noted above 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.	If the County doesn’t move any rural changes forward with regard to groundwater in the preferred alternative, there are no new adverse impacts to be considered in the EIS. When a utility pulls from an aquifer, it needs to be consistent with their individual water system plans, which are required to be consistent with the countywide water system plan. If rural changes are contemplated in the future, supplemental environmental analysis may be needed.	Letter (via comment form)	3.1.3

DEIS Public Comment Response Matrix

#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
179	Donald Fenton	<ul style="list-style-type: none"> Critical Aquifer Recharge Areas (CARA) page 3-51 “ The regulation of development and land use activities that may impact the quantity or quality of groundwater is critical to public welfare given the reliance of groundwater for the county's potable water supply. Several areas have been specifically identified in the CAO as Category I CARA's due to special circumstances or identified in accordance with WAS 365-190-100(4) as aquifer areas of significant potable water supply with susceptibility to groundwater contamination including, but not limited to Hansville, Seabeck, Island Lake, Gorst and Poulsbo.” Comment: Allowing development of the above referenced properties potentially will cause irreversible negative impacts to the Island Lake Aquifer. Once this property is clear-cut, bulldozed, and developed with impermeable surfaces the area will be forever lost for recharge of the aquifer. In addition, as ground surfaces are altered, the potential for contamination of the aquifer will be exacerbated. 	As noted above, if the County doesn't move any rural changes forward with regard to groundwater in the preferred alternative, there are no new adverse impacts to be considered in the EIS. When a utility pulls from an aquifer, it needs to be consistent with their individual water system plans, which are required to be consistent with the countywide water system plan. If rural changes are contemplated in the future, supplemental environmental analysis may be needed. Thank you for your feedback on CARAs, this will be forwarded to the County decision makers.	Letter (via comment form)	3.1.3
180	Donald Fenton	<ul style="list-style-type: none"> Critical Aquifer Recharge Areas (CARA) Silverdale Subarea page 3-51 “Ecology has listed seven streams in the Silverdale subarea on the 2018 303(d) impaired waters list, including an unnamed fish-bearing stream near Kitsap Mall and Clear, Strawberry, Mosher, Illahee, Steele, and Barker Creeks.” Comment: 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 down stream 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. 	Additional context on Barker Creek will be incorporated into the Final EIS.	Letter (via comment form)	3.1.3
181	Donald Fenton	<ul style="list-style-type: none"> Water Resources – Impacts Streams & Rivers page 3-53 “Increased development under all alternatives is likely to impact the quality and quantity of surface water from soil compaction, draining, and ditching across the landscape, increased impervious surface cover, and decreased forest cover associated with construction activities (Booth and Jackson 1977, Moore and Wondzell 2005). ... The development of previously undeveloped upland areas can result in various water quality concerns, including, but not limited to, increased fine sediment, nutrients, pathogens, and metals. Further, the impacts of fertilizers, pesticides, nutrients, bacteria and chemicals become more widely dispersed as more land area is developed.... Land clearing activities may accelerate runoff or result in elevated stream temperatures. Stream temperatures and summer low flows may be exacerbated by climate change under all alternatives. Moreover, alteration of a watershed runoff process and stream flow patterns is anticipated to be the most significant impact on water resources. ...” Comment: This says it all. With the inclusion of the property south of Island Lake in Alternative 3, we can expect all of this to occur in Barker Creek. 	Noted.	Letter (via comment form)	3.1.3
182	Donald Fenton	<ul style="list-style-type: none"> Water Resources – Impacts Lakes page 3-54 “The cumulative effects of development under all alternatives are expected to impact water quality in lakes in similar ways as marine resources and streams. Development activities and conversion of undeveloped land can increase the volume and quantity of surface water runoff and increase sediment and pollutant loads to lakes. ... Eutrophication, pathogens, and low dissolved oxygen levels are primary concerns for impacting water quality in lakes. ... Structural stabilization along lakeshores is expected to negatively impact shoreline habitat and interrupt natural processes.” Comment: As long time residents of Island Lake, we have already experienced all of this. In the late 1980's and early 1990's this was allowed to happen when Silverhills was developed. The lake became turbid from runoff which eventually settled to the bottom of the lake. As time went on, noxious lake weeds began to proliferate throughout the lake. With further development at the south end of the lake, we can expect this problem to exacerbate. One can also expect an impact from the reduced riparian functions, values, and overall water quality of Island Lake and Barker Creek by inclusion of 48 acres in the Silverdale UGA under Alternative 2 as described on page 3-58 Silverdale Subarea. 	Thank you for your feedback. Your comments on the alternatives will be forwarded to County decision makers.	Letter (via comment form)	3.1.3
183	Donald Fenton	<ul style="list-style-type: none"> Plants & Animals – Impacts Silverdale Subarea page 3-84 “A portion of the UGA boundary expansion includes the southern portion of Island Lake and Barker Creek. Expansion of the UGA boundary in this area may impact the current undeveloped shoreline habitat, similar to those impacts described in Section 3.1.3 Water Resources. Conversion or indirect impacts to the shoreline habitats associated with Island Lake and Barker Creek are expected to impact both aquatic and terrestrial species that occupy these ecosystems. Increased zoning density is expected to increase impervious surface coverage and may result in conversion of intact wildlife habitat areas.” Comment: Island Lake and Barker Creek is home to varied species of wildlife and fish including bald eagles, blue heron, osprey, kingfishers numerous species of waterfowl (ducks, geese, cormorant), deer, coyote, black bear, otters, beaver, trout, bass, bluegill, salmon and cutthroat trout in Barker Creek, amphibians (frogs, newts, salamander), and turtles. All of these animals and fish will be negatively impacted by the loss of habitat should the Silverdale UGA be expanded into the Island Lake area. Not only will they be impacted during construction but will be exposed to long term impacts of added light and noise from development for years to come. 	The Final EIS will include more information about the expected habitat impacts of expansion of the Silverdale UGA in this area.	Letter (via comment form)	3.1.4
184	Donald Fenton	<ul style="list-style-type: none"> Historical & Cultural Preservation – Impacts Alternative 3 page 3-87 “Overall UGA expansion in proximity to water bodies would be greater under Alternative 3 than under any alternative, which as a result would create a greater potential impact on cultural resources. Silverdale Subarea page 3-88 “ A portion of the UGA boundary expansion in Alternative 3 includes the southern portion of Island Lake and Barker Creek. This area may include increased impacts on cultural resources as most of this area is undeveloped.” Comment: The southern portion of Island Lake and the northern section of Barker Creek was operated as a children's summer camp for more than 60 years. As stated above, most of this property is undeveloped and may have historical and cultural resources. There has been indication from the State that this area may have been occupied by local tribes. In light of that, a comprehensive study of the historical and cultural aspects should be done prior to inclusion in the Silverdale UGA and subsequent development. 	Thank you for your comment. Discovery and historical/cultural resources study would have to occur with any proposed development on a site consistent with Kitsap County's SEPA code.	Letter (via comment form)	3.2.4
185	Donald Fenton	<ul style="list-style-type: none"> Fire Protection – Impacts Alternative 3 page 3-197 “Alternative 3 with UGA expansion will be challenged by increased emergency response travel times or will otherwise require the development of new fire departments closer to expanded UGA areas.” Comment: Increased emergency response times are a matter of life and death for the citizens of Kitsap County. It is not prudent to expand the Silverdale UGA into the Island Lake area with narrow roadways and limited access points thus leading to even slower response times in event of an emergency. 	The comment is noted and forwarded to County decision makers.	Letter (via comment form)	3.3.2
186	Donald Fenton	<ul style="list-style-type: none"> Parks & Recreation – Impacts Community Parks page 3-212 “Currently and within the 20-year planning period, the County will not be able to meet the Community Parks LOS standard as shown in Exhibit 3.3.4.2-4.” Comment: I can not think of a better way to help meet the Community Parks LOS than the County purchasing the east portion of former camp property (75 acres) for an additional park at the south end of Island Lake. There is already some infrastructure in place that could be utilized for park amenities. 	The comment is noted and forwarded to County decision makers.	Letter (via comment form)	3.3.4
187	Donald Fenton	<ul style="list-style-type: none"> Stormwater – Impacts page 3-233 “The creation of more impervious surface area and the reduction of forest land cover would reduce the amount of rainwater intercepted by trees and infiltration into the ground, thereby increasing the volume and rate of stormwater runoff.” Comment: By including the property immediately south of Island Lake in and increased Silverdale UGA boundary and the development associated with that, impervious surface area and stormwater runoff will have a detrimental affect on Island Lake and Barker Creek. In addition, climate change could increase temperatures of the stormwater emptying into Barker Creek. 	The comment is noted and forwarded to County decision makers. Suggested additional mitigation measures will be reviewed and considered in the FEIS.	Letter (via comment form)	3.3.8

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
188	Donald Fenton	<p>• Energy & Telecommunications – Impacts page 3-247 “Alternative 3 focuses on dispersed growth. Dispersed population growth in the county would result in the highest infrastructure cost of the three alternatives due to the demand of service expansions and extensions. Anywhere there is focused growth centers will allow for more efficient services for natural gas, electricity and telecommunications.” Comment: There is currently no infrastructure on the property being considered to be added to the Silverdale UGA next to Island Lake and Barker Creek. This includes sewers, electricity, gas, and water. The infrastructure needed would be very costly and much would need to be extended from the west of Barker Creek. This could result in contamination of the creek as these facilities cross the creek.</p>	Thank you for your comments. The comment is noted and forwarded to County decision makers.	Letter (via comment form)	3.3.10
189	Donald Fenton	<p>Summary: All of the citations above point to the severe environmental impacts for including the property south of Island Lake in an expanded Silverdale UGA under Alternative 3. Also, Alternative 3 does little if anything to meet the County stated goal of reducing urban sprawl as shown in Exhibit 3.2.2.2-1 on page 3-36 and mentioned many times throughout the DEIS. In addition to this, in the early 1990's the then County Commissioners promised the Island Lake community that the county would not expand urban growth into the Central Valley Corridor. By including this property in the Silverdale UGA, it does exactly the opposite of their promise. Regards, Donald Fenton Donald Fenton Island Lake Resident Dated 2-19-2024</p>	Thank you for your comment. The comment is noted and forwarded to County decision makers.	Letter (via comment form)	Multiple
190	Leslie Ashby	<p>To Whom it May Concern: As residents in these zones, we are opposed to option #3. It is detrimental to the environment in these areas. Development does not equal progress in this case for all. In fact, it is the opposite: destruction and demise. We have a responsibility to respect the land, all creatures, and nonliving beings that inhabit our town. In this zone, we strive to live With the land, not against it. That is why we DO NOT want you to allow Reclassification Request #49 along Phillips Rd, but to see option 2 as the most balanced option for everyone involved (land, animals, people). Option 3 would have a negative impact from 200 homes would have on the local environment: Cool Creek is a salmon bearing stream that flows through this property and will be negatively affected, if not completely destroyed. In our south kitsap school district as a 5th grade teacher, I’m teaching our district’s agreed upon standards of human impact. And yet, every year, I have to explain why right here in town, we put people before the environment and nonhuman creatures time and time again. You took this office for the opportunity to help or for the power. Love and empathy can accomplish everything, power over the land is only intended to control money or inflate the ego. Our grandparents rehabilitated the creek years ago after salmon were suffering from developmental effects nearby. Don’t undo the decades of care our family and this area has put into preserving and respecting the land. Are you making choices your 7 year old self would be proud of? Why 7? Because that is when you know enough about how important the world is and you still believe in the magic of hope and the future. Be the superhero in your story. You have the chance to play a real life super hero right now. Will you help or hurt our land? Will you be the superhero that this town needs to make mindful choices setting an example of conscious development while upholding ethical standards for the land on which we rely on and now relies on us. With Gratitude, Leslie Ashby</p>	The comment is noted and forwarded to County decision makers.	Email	2
191	Christie Schultz	<p>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, wellpopulated, 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</p>	The comment is noted and forwarded to County decision makers involved with the comprehensive plan update.	Letter (via comment form)	n/a

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
192	Dale Zittle	It is time to consider that South Kitsap needs less urban sprawl and less expansion of the UGA. Especially along the Phillips Road corridor. The expansion of housing projects and the two traffic lights at the Sedgwick Road and Mullenix Road accesses to Phillips Road have created both excessive amounts of traffic and environmental (Lake Emelia) damage. Lake Emelia has been polluted due to contaminated run-off from the major housing development at the corner of Phillips Road and Baker Road. Wildlife (Eagles, bear, deer, waterfowl) not to mention trees that have been lost due to the urban growth in the area. Now, more homes are being considered. More loss of trees and wildlife and eco-friendly environments. The proposal of a housing development on land encompassing Cool Creek, a fish spawning waterway. More traffic put on a road that was not built for it. More speeders and more reckless drivers who have no regard for those families that live along Phillips Road. Maybe it's time for South Kitsap to think more about the environmental impacts these developments have on areas in South Kitsap than the collection of revenue from those developments that are causing the type of damage witnessed along Phillips Road. I would urge. ... No More expansion of the UGA along Phillips Road. YES, to Alternative 2 for South Kitsap. NO to Reclassification Request #49. Please, consider the impact 40 acres of homes would have on Cool Creek and its surroundings, the added traffic along Phillips Road (which is already becoming over crowded with vehicles of all sizes) and the loss of wildlife along with the environmental damage that has already been caused by developments along Phillips Road and Baker Road.	Thank you for your feedback. Your comments on the alternatives will be forwarded to County decision makers.	Comment form	Multiple
193	Linda Paralez	In all the alternatives, there is a persistent expansion of LAMRID zoning and construction at the intersection of Gunderson and Bond Road at Stottlemeyer. Over the years, local residents have continued to complain about the violation of view (tree) buffers, setbacks, and use of signage (on roadways and building walls) that do not conform to code with no response from the county. Increasing traffic on Bond Road and the necessity to install turn lanes and traffic lights have limited the required tree buffers, and thus increased the "eye-sore" quality of these commercial uses in rural areas. Please ensure that expansion of LAMRIDs replant (or ideally, do not remove existing trees), controls signage per existing code, manages traffic appropriately, and does proper code enforcement. Thanks.	Thank you for your feedback. Your comments on the alternatives will be forwarded to County decision makers.	Comment form	2
194	Lisa Hurt	My name is Lisa Hurt and I have been a Kitsap County resident for 60 years. I believe it is the rural lands that provide the beauty, nature and quality of life that draw people to this area. Growing up here, I have watched growth and urban sprawl happening at an alarming rate. Comprehensive plans come and go in which zoning changes happen again and again. One concerning trend is changing Rural residential to LAMRID. Limited Areas of more intense development. Once that door is open, there is no going back. The rural lands start getting nibbled away at and before you know it, Bond Road will look like Aurora Ave in Seattle. I am concerned that we are allowing far too much rezoning of the rural, farm and forested lands in our county. The fact that there are no incentives to keep these spaces whole and intact is of great concern. I live in one of the last rural areas left in the county. I pay a lot of taxes to keep my property that way. With all of the development and clearcutting around me, my property has become an animal highway. There are so few spaces for wildlife left! We need corridors and wetlands for animals. If we want to keep the flavor of this area, we should really consider some kind of incentives for people to keep these spaces open and natural. I suggest putting a moratorium on all rezoning of rural, farm and forested lands until a more holistic vision is created in which these important areas that provide for the quality of life that people seek are taken care of in perpetuity. We all want clean air to breathe, clean water to drink, fresh local food to eat and not feel overcrowded. Please, I implore you to think about keeping the rural areas of Kitsap rural and not letting developers bully everybody to their will.	Thank you for your feedback. Your comments on the alternatives will be forwarded to County decision makers.	Comment form	Multiple
195	Walt Elliott	Public Comment on the Draft Environmental Impact Statement (DEIS) December 2023 Walt Elliott, Kingston WA, 2/21/2024. 3.3.4.2 Parks & Recreation – Impacts Issue: There is insufficient information to assess the impact of the Alternatives on active recreation. • The DEIS states “the final EIS will revise the Draft EIS as appropriate and respond to comments as required in WAC 197-11-560”. • The DEIS refers to an updated PROS plan to provide information on the recreation needs of future growth. That update is in progress with approvals scheduled for the second quarter of 2024. The Community Recreation Priorities survey, needed to support that Update was scheduled for December but it has not yet been completed. It is not feasible for that information, needed to assess the impact of the Alternatives on active recreation to be available for public review and comment (per WAC 197-11- 560) before the EIS is final. • A GMA goal is “to stimulate the health and welfare of human beings”. Active recreation is important to achieving that goal, especially for young people. The lack of information in the DEIS on active recreation makes it impossible for those involved with active adult recreation and youth sports to evaluate the Alternatives. • The 2012 PROS plan identified field shortages. Since, there has not been sufficient funding to meet the active recreation gaps identified in the Plan. As a result, addressing that need in the EIS is a matter of significant public concern. Recommendation: Use the LOS standards in the 2012 PROS Plan, to calculate 2044 active recreation needs and gaps as is being done in the DEIS for passive recreation needs. Facility inventory varies by County region. For north Kitsap include the objective data on inventory and need collected by the KCAC Parks and Trails subcommittee.	Thank you for your comments. The comment is noted and forwarded to County decision makers.	Email	3.3.4
196	Walt Elliott	3.3.4.3 Parks and Recreation – Mitigation Measures Issue: There are no mitigation measures identified to address the active recreation gap. • The 2012 PROS Plan reports that “School Districts provide most of the (active) athletic facilities. The recent failed NKSD bond measure indicates substantial school investment in new athletic fields is unlikely. • The PROS Plan has identified public-private partnerships and community organizations as a means to address recreation needs gaps. • The Noth Kitsap Unted project which could be accommodates in Alternative 3, is an example of a partnership that could meet active recreation gaps. Recommendation: Include public-private partnerships and community projects to mitigate active recreation gaps in Alternative 3.	The comment is noted and forwarded to County decision makers. Suggested additional mitigation measures will be reviewed and considered in the FEIS.	Email	3.3.4
197	Walt Elliott	Population, Housing & Employment (Section 3.2.3), Transportation (Section 3.2.6), Parks and Recreation (Section 3.3.4) Issue: The DEIS does not include the positive impact and mitigation that Alternative 3 will have by including a central North Kitsap sports complex. • Alternative 3 (which includes Application 72) will facilitate the establishment of a sports complex which will have significantly less adverse impact than the collective impact of those facilities if dispersed throughout North Kitsap. • The location is central to all North Kitsap's communities. This location is equitable to all NK residents and will reduce traffic impacts. • Nearly all the 400 acres is underlain by sand. Documented surveys found no streams and only one small wetland. Based on Rotary's several years of search this would not likely be the case if the complex were located on similarly sized sites available elsewhere in Noth Kitsap. • Because of the above storm and sanitary sewer can be infiltrated on-site easily and sand is the perfect material for field construction • The highway location means that no local streets or neighborhoods will be adversely affected. Locating the complex in or adjacent to urban areas would have significantly greater transportation traffic impact. • Adjacency to the Port Gamble Forest Heritage Park will create a "mixed-use" effect whereby families can engage in numerous recreation activities with less traveling to diverse locations. This was a stated purpose when establishing Heritage Parks. Recommendation: Include in the above sections potential benefit in Alternative 3 of a sports complex in meeting recreation needs in sections 3.2.3,4, and 6. Consider a stipulation that application 72 includes setting aside 40 acres to a non-profit or government organization for a recreation complex.	Thank you for your feedback. Your comments on the alternatives and the Application 72 site in particular will be forwarded to County decision makers. Please note that the EIS does not study the impacts of a specific use on a specific site, merely the impacts (both positive and negative)	Email	3.2.3, 3.2.6, and 3.3.4

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
198	Walt Elliott	3.2.2.1 Relationship to Plans & Policies – Affected Environment Goal: “Encourage a variety of housing types including affordable housing. Goal: “The region preserves, improves, and expands its housing stock to provide a range of affordable, accessible, healthy, and safe housing choices to every resident.” Issue: The comparison of Alternatives to meet these two goals cannot be objectively assessed. • High density in urban areas, with limited available land, would increase demand for land and drive-up urban housing costs. Affordability appears to be achieved only by residents having less living space. • Requiring large tracts in rural areas would increase rural housing costs. While rural land may be lower cost, requirements to buy large lots results in higher net housing costs. • Limited housing choices to either high density urban dwellings or large rural lots is contrary to public housing preferences. Please see the 2023 Profile of Home Buyers and Sellers1Survey by the National Association of Realtors. • Cluster development (Chapter 17.450) has been promoted to reduce environmental impact. By locating clusters in, and among, rural greenbelt areas rural environment character will be sustained. Recommendation: Include housing cost per square foot as a metric for comparing Alternatives. Include a metric that compares future housing supply and diversity to documented public preferences. Include cluster development to mitigate housing development impact in rural areas	Thank you for your comments. It is not possible to include housing price per square foot, as price data cannot be estimated at the high level at which housing types are allocated in this study. The Land Capacity Analysis that produced the background for this EIS estimated capacity for homes based on observed densities, and housing types affordable to various income brackets the County must plan for is per Commerce guidance. Your feedback on cluster development is noted and forwarded to County decision makers.	Email	3.2.2.1
199	Nicholas Bond, Port Orchard Development Director	Thank you for the opportunity to provide comments on the proposed alternatives for the Kitsap County 2024 Periodic Update. I am writing on behalf of the City Council and the Mayor to express Port Orchard’s support for proposed Alternative 2. While Alternative 3 is also palatable, we believe that Alternative 2 is most consistent with the legal requirements to plan for affordable housing across all income levels. In addition to expressing support for Alternative 2, we would like to offer comments on some other policy proposals in the proposed plan.	Thank you for your feedback. Your comments on the alternatives will be forwarded to County decision makers.	Letter	2
200	Nicholas Bond, Port Orchard Development Director	1. UGA Amendment #60. The City is neutral on the expansion of the UGA in this area. Port Orchard has concerns about the critical areas impacting these properties but is supportive of the expansion if the County believes that the critical areas that are present do not preclude urban development. Port Orchard is concerned about the proposed industrial designation and would prefer to see a commercial or residential designation in this location.	Thank you for your comments. The comment is noted and forwarded to County decision makers.	Letter	Appendix B
201	Nicholas Bond, Port Orchard Development Director	2. UGA Amendment #79. Port Orchard supports amendment #79 as proposed. This property is bordered on two sides by urban development and the third side is a stream. The proposed urban boundary is both logical and regular. Port Orchard is willing to have this parcel added to its UGA.	Thank you for your comments. The comment is noted and forwarded to County decision makers.	Letter	Appendix B
202	Nicholas Bond, Port Orchard Development Director	3. Phillips Road UGA Contraction: The City understands that the County must size their UGA appropriately and supports the proposed reduction of the UGA east of Phillips Road and North of Sedgwick.	Thank you for your comments. The comment is noted and forwarded to County decision makers.	Letter	Appendix B
203	Nicholas Bond, Port Orchard Development Director	4. Commercial Redesignations: The County has proposed several Commercial redesignations within the Port Orchard UGA. Port Orchard does not object to these redesignations.	Thank you for your comments. The comment is noted and forwarded to County decision makers.	Letter	Appendix B
204	Nicholas Bond, Port Orchard Development Director	5. Increasing SEPA Thresholds: Port Orchard has serious concerns about the County’s proposed changes to SEPA thresholds. These concerns could be addressed if the County were to enter an ILA with Port Orchard to ensure that impacts on Port Orchard (especially transportation impacts) from development in Page 2 of 2 the Port Orchard UGA, are mitigated. We want to ensure that development in the Port Orchard UGA pays its fair and proportionate share toward city transportation projects including but not limited to Bethel Ave, Lund Ave, Tremont Street, and Sedgwick. Perhaps a policy could be added to the County’s comprehensive plan that states that the County will enter interlocal agreements with cities adjacent to affiliated UGAs to ensure that transportation impacts caused by development in UGAs are mitigated through the payment of mitigation fees based on trip generation and that the County will not approve development that causes a level of service failure on a city facility. Ultimately, Port Orchard would like to see payment of transportation mitigation fees via an ILA to help fund Port Orchard transportation projects that benefit new development in the Port Orchard UGA. We have successfully conditioned projects outside of the City through SEPA review to ensure that impacts to Port Orchard are mitigated. This opportunity to seek mitigation will be lost if the County increases SEPA thresholds without a framework to mitigate transportation impacts.	Thank you for your comments. The comment is noted and forwarded to County decision makers.	Letter	2.5.1
205	Nicholas Bond, Port Orchard Development Director	6. Transportation Level of Service: Kitsap County should include transportation levels of service for County roads that include segments, intersections, and non-motorized facilities. The current LOS standard in the Comprehensive Plan only adopted a road segment LOS.	Kitsap county currently only has level of service standards adopted for roadways. The updated Comprehensive plan will have policies, guided by new State regulations 36.70A.070(6) precipitated by ESSHB 1181, requiring the development of multi-modal level of service standards, within 2-years of funding being appropriated by the State. The County will develop multi-modal LOS prior to the statutory deadline.	Letter	3.2.6
206	Nicholas Bond, Port Orchard Development Director	7. South Kitsap Fire and Rescue. SKFR has acquired a property just outside of the Port Orchard UGA for a new fire station. This property, parcel 052301-3-014-2001 should be added to the UGA with a public facility designation to allow for the construction of a fire station connection to public sewer.	Thank you for your comments. The comment is noted and forwarded to County decision makers.	Letter	3.3.2
207	Nicholas Bond, Port Orchard Development Director	8. UGA Amendment #66: The City objects to the proposed addition of rural commercial lands at the intersection of SR-16 and Mullenix Road. The site of this proposed change in land use designation is encumbered by a type F stream, wetlands, and has indications for geologic hazards. The proposal is inconsistent with the countywide planning policies and Vision 2050 concerning rural development and the protection of critical areas. The proposal is also inconsistent with the goals of the growth management act concerning reducing sprawl, protecting the environment, and for rural development. The proposed redesignation is not supported by rural employment growth targets as found in the countywide planning policies and should be denied. Additional employment growth in rural areas should be prioritized in rural centers, not on lands encumbered by critical area resources. There is ample commercial land capacity proposed in the Port Orchard UGA along Bethel Avenue South, near this location. An expansion of rural commercial land in this location is not warranted. Thank you for the opportunity to comment. Sincerely, Nicholas Bond, AICP City Development Director	Thank you for this information. It will be forwarded to County decision makers regarding potential addition to the UGA for a fire station.	Letter	Appendix B

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
208	Tim Trohimovich, Futurewise	Thank you for the opportunity to comment on the 2024 Comprehensive Plan Update Draft Environmental Impact Statement for Kitsap County (DEIS). We appreciate the data and analysis in the DEIS. We believe the DEIS includes valuable information that will help decision makers and the public make good decisions on the comprehensive plan and the future of Kitsap County. 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. The comprehensive plan must reduce greenhouse gas pollution consistent with VISION 2050. See 3.1.2.2 Air Quality/Climate – Impacts and 3.1.2.3 Air Quality/Climate – Mitigation Measures pp. 3-31 – 3-26. We appreciate that the 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.” Unfortunately, increasing greenhouse gas emissions is inconsistent with VISION 2050. Comprehensive plans must be consistent multicounty planning policies.2 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. 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.” 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. As you can see, the goal, multicounty planning policy, and action require the 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. To comply with VISION 2050, we recommend the following additional mitigation be included: Not approving comprehensive plan and zoning amendments including urban growth area expansions and rural capacity increases that will increase greenhouse gas emissions. A peer-reviewed scientific paper has documented that to meet the necessary reductions in greenhouse gas pollution higher residential densities are needed.7 Nationally, densities must increase on average by 19 percent. The paper concluded this can be achieved by a “mix of small apartment buildings and modest single-family homes ...”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.”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 growth, pollution prevention, and design for environment.11 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.	The comment is noted and forwarded to County decision makers involved with the comprehensive plan update. Suggested additional mitigation measures will be reviewed and considered in the FEIS.	Letter	3.1.2
209	Tim Trohimovich, Futurewise	Incorporate additional upzones within the existing urban growth areas such as those required by RCW 36.70A.635 as a mitigating measure that can reduce or eliminate the need for UGA expansions. Include the measures in Sections 3.1.3.3, 3.1.4.3, and 3.2.3.3 Mitigation Measures on pp. 3-61 – 3-63, pp. 3-82 – 3 – 83, and pp. 3-84 – 3-86. An additional mitigation measure for surface water quality, land use, and fish and wildlife impacts is to grow up, not out. 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.’”13 We recommend this be included as a potential mitigating measure for surface water quality, land use, and fish and wildlife impacts.	Thank you for your comment. We are maximizing opportunities for growth in our urban areas, including numerous code changes and incentives to grow up and not out, and minimize the need for UGA expansions in Alternative 2.	Letter	3.1.3.3, 3.1.4.3, and 3.2.3.3
210	Tim Trohimovich, Futurewise	The EIS should analyze the impacts on and mitigate the impacts on impervious surfaces due to increased urban development allowed by the alternatives. See DEIS 3.1.3.2 Water Resources – Impacts and 3.1.3.3 Water Resources – Mitigation Measures pp. 3-52 – 3-63 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.14 Impervious surfaces are continuing to increase in Kitsap County.15 The EIS should analyze which basins will have total impervious surfaces above five to ten percent and forest cover below 65 percent of the basin for the various alternatives. The EIS should propose as mitigating measures 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.	Thank you for your comment. Your suggestions for mitigation will be reviewed and considered in the Final EIS. The County will consider including additional information about impervious surface will be included in the Final EIS as available, although impervious surface maximums are defined in code and are not included in the factors that vary from alternative to alternative.	Letter	3.1.3
211	Tim Trohimovich, Futurewise	16. The EIS should analyze the impacts on and mitigate the impacts on rare plant categories and listings from the department of natural resources, natural heritage program. See 3.1.4.1 on p. 3-67. The “GMA requires the County to protect the functions and values of Critical Area Ecosystems.”17 This includes the “high quality ecosystem and rare plant categories and listings from the department of natural resources, natural heritage program.”18 The 2021 Washington Vascular Plant Species of Conservation Concern identifies rare plants in Kitsap County.19 The impacts on these plants and ecosystems need to be analyzed and mitigating measures included in the EIS.	The draft Critical Areas Ordinance refers to the DNR Natural Heritage Program. The Final EIS will use any available state resources in its analysis, however, specific code changes may not be required.	Letter	3.1.4
212	Tim Trohimovich, Futurewise	The alternatives must be analyzed to determine if they meet the gap in need and capacity for medium high and high housing densities. See Land & Shoreline Use 3.2.1.2 Impacts 3-21 – 3-21.RCW 36.70A.070(2)(c) requires the housing elements adopted by Kitsap County and the cities in the county 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” 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.20 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 units since housing at those densities is attractive to higher income individuals and families. The EIS needs to analyze whether the alternatives close this gap.	Thank you for your comments. The revised Comprehensive Plan and FEIS will include details on planning for housing allocations by income band.	Letter	3.1.4
213	Tim Trohimovich, Futurewise	Please analyze the extent to which the alternatives will increase development in Wildland-Urban Interface (WUI) and please add directing growth away from the WUI as a Mitigation Measure. See DEIS 3.2.1.2 Impacts and 3.2.1.3 Mitigation Measures on pp. 3-5 – 3-23. Large areas of Kitsap County are located in the Wildland-Urban Interface (WUI).21 Wildfire is a significant threat in Kitsap County and climate change is making the threat worse.22 We recommend that the EIS analyze the which alternatives will increase development in the WUI. An additional mitigating measure of directing growth away from the WUI fringe should be added to DEIS. This is consistent with RCW 36.70A.070(1) which 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.	The Final EIS will include an evaluation of how development in the alternatives will interface with the Wildland Urban Interface.	Letter	3.2.1

DEIS Public Comment Response Matrix

#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
214	Tim Trohimovich, Futurewise	Exhibit 3.2.2.2-2, Consistency of alternatives with PSRC’s VISION 2050, on 3-39, did not analyze the consistency of the urban growth area expansions on VISION 2050 and the multicounty planning policies. Alternatives 2 and 3 propose urban growth area expansions. ²³ “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.” ²⁴ MPP-RGS-5 provides “[e]nsure long-term stability and sustainability of the urban growth area consistent with the regional vision.” ²⁵ 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.” ²⁶ Comprehensive plans must be consistent multicounty planning policies. ²⁷ Exhibit 3.2.2.2-2 does not adequately analyze the consistency of the urban growth area expansions on VISION 2050 and must do so. MPP-RGS-5 is not even mentioned in the EIS and compliance with the multicounty planning policy is not considered. ²⁸ This must be corrected.	Additional detail on consistency with VISION 2050 by alternative will be included in the Final EIS.	Letter	3.2.2
215	Tim Trohimovich, Futurewise	Exhibit 3.2.2.2-2, Consistency of alternatives with PSRC’s VISION 2050, on page 3-40 needs to adequately analyze the alternatives consistency with Multicounty Planning Policy MPP-RGS-14 and the Regional Growth Strategy. The Growth Management Act requires counties to comply with the Puget Sound Regional Council Multicounty Planning Policies. ²⁹ 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.” ³⁰ 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. ³¹ On a percentage basis, this is the highest rural growth population growth target of the four Central Puget County counties. ³² 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. ³³ 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. ³⁴ Exhibit 3.2.2.2-2 states that “[a]ll alternatives limit growth in rural land.” But that is not what MPP-RGS-14 requires. MPP-RGS-14 directs Kitsap County 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.” ³⁵ The EIS, needs to analyze if any of the alternatives will reduce rural growth rates over time and will put Kitsap County on a path to achieve 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 by 2050. ³⁶ The data in DEIS did not show whether this was the case.	Additional detail on consistency with VISION 2050 by alternative will be included in the Final EIS. Please note that Alternative 2 attempts to maximize opportunities for growth in our urban areas, thus lessening pressure on rural areas and a projected reduced rural share.	Letter	3.2.2
216	Tim Trohimovich, Futurewise	Exhibit 3.2.2.2-2, Consistency of alternatives with PSRC’s VISION 2050, on DEIS pages 3-39 – 3-42, did not adequately analyze the rural comprehensive plan amendments or upzones that increase rural population and employment capacity with VISION 2050 and the multicounty planning policies. See also Appendix B: Reclassification Request Summary List. The Growth Management Act requires counties to comply with the Puget Sound Regional Council Multicounty Planning Policies. ³⁷ 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.” ³⁸ 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. ³⁹ On a percentage basis, this is the highest rural growth population growth target of the four Central Puget County counties. ⁴⁰ 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. ⁴¹ 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. ⁴² We were unable to find data on the capacity of the various rural zones in the Land Capacity Analysis or the DEIS. ⁴³ It is also unclear what the rural capacity totals in Exhibit 2.5.3-3 are based on given that 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 but has the same reported capacity as Alternatives 1 and 2. ⁴⁴ Data on rural capacity by zone would be helpful to determine if the comprehensive plan can comply with the Regional Growth Strategy. 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 appears to be 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 impacts of these amendments including their consistency with VISION 2050 need to be analyzed in the EIS. 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. ⁴⁵ So there are important policies behind the numbers.	Additional detail on consistency with VISION 2050 by alternative will be included in the Final EIS. Please note that Alternative 2 attempts to maximize opportunities for growth in our urban areas, thus lessening pressure on rural areas and a projected reduced rural share.	Letter	3.2.2
217	Tim Trohimovich, Futurewise	The DEIS needs to analyze whether the impact of removing the lot aggregation requirement from the Suquamish and Manchester LAMIRDS complies with Multicounty Planning Policy MPP-RGS-14 and the Regional Growth Strategy. DEIS pp. 3-45 – 3-46. The DEIS states that the “removal of lot aggregation requirements is consistent with PSRC policies to streamline development, while also allow rural areas to add limited growth and population without changing the character of the rural lands.” We do not believe that taking a step that increases rural development capacity is consistent VISION 2025 and MPP-RGS-14. ⁴⁶ The test to be applied to determine if an EIS is adequate is “‘whether the environmental effects of the proposed action and reasonable alternatives are sufficiently disclosed, discussed and that they are substantiated by supportive opinion and data.’ Leschi v. Highway Comm’n, supra at 286, 525 P.2d at 785.” ⁴⁷ The EIS should provide or cite to the data or the supportive opinion to document this claim.	Thank you for the comment. Additional detail on removing the lot aggregation requirement and its potential environmental effects will be included in the Final EIS.	Letter	3.2.2
218	Tim Trohimovich, Futurewise	Part 3.2.2.4, Significant Unavoidable Adverse Impacts, needs to identify as a significant unavoidable adverse impact any alternative that does not reduce rural growth rates. See DEIS page 3-46. Part 3.2.2.4 states that “[w]ith implementation of mitigation measures, no significant unavoidable adverse impacts are anticipated regarding future plan consistency under any of the alternatives.” But the DEIS did not analyze if any of the alternatives will reduce rural growth rates over time and will put Kitsap County on a path to achieve 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 by 2050. ⁴⁸ Failing to do this is a significant unavoidable adverse impacts and needs to be identified as such.	Changes to rural growth rates over time will be added to the analysis of impacts in the Final EIS.	Letter	3.2.2

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219	Tim Trohimovich, Futurewise	The DEIS should analyze whether the alternatives will exceed the Watershed Restoration and Enhancement Plan permit-exempt well estimate for WRIA 15. See DEIS 3.1.3.1 Water Resources – Affected Environment Groundwater pp. 3-55 – 3-60. It is good that the DEIS includes on page 3-55 the estimate that Kitsap County will have 2,568 new permit-exempt domestic well connections between 2018-2038. This important because wells potentially impact low flows. ⁴⁹ “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.” The current 2022-2044 rural population growth target is 4,391 and this is also shown as the rural growth capacity for each alternative. ⁵⁰ The DEIS reports that Kitsap County’s average household size is 2.46 people. ⁵¹ This would translate into 1,784 housing units. There are also proposals to increase rural capacity. The DEIS should analyze whether the alternatives will exceed the new permit-exempt domestic well connections estimate. If the alternative exceeds the estimate, additional measures to mitigate the impacts on ground water and instream flows should be included in the EIS.	The preferred alternative will compare potential new permit-exempt well connections to the WRIA 15 Plan.	Letter	3.1.3
220	Tim Trohimovich, Futurewise	We recommend that the EIS include as an addition mitigation measure adopting regulations that require pre-ground disturbance site investigations for sites were the predictive model show cultural resources are likely or when requested by affected Native American Tribes and Nations. See 3.2.4.3 Historical & Cultural Preservation – Mitigation Measures p. 3-89. We appreciate the DEIS’s analysis of cultural impacts. As the DEIS notes many historical and cultural sites are in shoreline areas due to the availability of water, food, and transportation routes. 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 activities that can damage archaeological sites are undertaken. ⁵² 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).” 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. ⁵³ 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.” ⁵⁴ At least some of that money could have been saved by an upfront archeological investigation. To address these adverse impacts, we recommend that the EIS include as an addition mitigation measure adopting regulations that require pre-ground disturbance site investigations for sites were the predictive model show cultural resources are likely or when requested by affected Native American Tribes and Nations.	Thank you for your comment. The County will consider potential regulations on pre-ground disturbance site investigations for inclusion as potential mitigation in the Final EIS.	Letter	3.2.4
221	Tim Trohimovich, Futurewise	Reconsider designating agricultural lands of long-term commercial significance. 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. ⁵⁵ Commerce made additional changes in 2023 as well. ⁵⁶ 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. ⁵⁷ Total income from farm-related sources in Kitsap County increased from \$3,161,000 in 2017 to \$4,791,000 in 2022. ⁵⁸ Average per farm income increased from \$23,944 in 2017 to \$53,831 in 2022. ⁵⁹ 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. ⁶⁰ 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 consistent with the updated minimum guidelines. The impacts of designating and not designating agricultural lands of long-term commercial significance should be analyzed in the EIS.Thank you for considering our comments. If you require additional information, please contact me at telephone (206) 343-0681 or email: tim@futurewise.org.	Thank you for your comment. The County will consider additional agricultural planning in 2025+.	Letter	1
222	Puget Sound Energy	Electrification of the building and transportation sectors will increase electric load in the County. It is important to recognize that, as the County is reviewing impacts to the environment, the increase in electric demand due to electrification policies will increase demand and result in the need for additional electrical infrastructure. Energy efficiency and conservation, including demand response technologies, will be important tools in managing electric energy consumption. However, these tools will not remove the need for additional electrical facilities in the County. Additional electrical facilities will include new and upsized transmission and distribution lines, transformers, substations and switching stations to serve new electrical load. Local generation (such as wind, solar, hydrogen, geothermal, hydropower, biomass, small-scale nuclear) and energy storage (batteries) could also be installed. This increase in energy demand and the subsequent development of new electrical infrastructure will need to be balanced and consistent with many of the other policies contemplated in the proposed Comprehensive Plan update. Policies will need to support an increase in infrastructure in the electric distribution and transmission systems and will need to work in concert with policies that support reliability, resiliency, safety, the provision of low cost energy, and Kitsap County’s electrification and de-carbonization policies. Electrical infrastructure within Kitsap County has been installed over time in response to local population growth and the development pattern established by the County. In contrast to the standard model of utility growth being driven by population growth, the phase out of fossil fuel energy creates new demand for utility service within existing communities. Guided by electrification policies and codes, a neighborhood with little to no growth in population will still see significant growth in electric demand. In this situation development is not driven by the chosen growth strategy but by the policy framework supporting electrification and decarbonization. PSE is committed to meeting our obligation under state law to provide the necessary electrical service to meet growing demand in a safe, affordable and reliable manner. We also are committed to transition to a decarbonized energy future. We share this information to foster a solid understanding of the impacts that these policies will bring. It is important to approach the energy transition with an understanding of what will be needed to achieve the County goals and policies. We look forward to continued collaboration with the County to address policy and development challenges that come with increased electrification and decarbonization. PSE is encouraging the County to ensure the impacts of proposed policies and action alternatives adequately address the need for new electrical infrastructure throughout unincorporated Kitsap County.	Thank you for your comment. This will be incorporated in the FEIS.	Letter	3.3.10

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223	Puget Sound Energy	PSE encourages the County to review their development regulations during this DEIS Comprehensive Plan update process to ensure alignment between goals and policies that support development and environmental protection alongside the goals of carbon reduction and electrification. For example, providing flexibility and certainty for permitting, development, operation, maintenance and repair of the needed electrical infrastructure within the County’s development regulations will support reliable, resilient, and cost effective provision of power.	Thank you for your comment. This will be incorporated in the FEIS.	Letter	3.3.10
224	Puget Sound Energy	PSE places high priority on providing safe, reliable and resilient energy. Tree retention and/or vegetation management policies can impact PSE’s ability to provide safe, reliable electricity and increase costs. Additionally, tree and/or vegetation management policies should support PSE’s need to remove vegetation in an effort to fulfill wildfire prevention strategies. PSE supports a strong focus on ‘Right Tree, Right Place’ policies to address tree protections. The DEIS makes mention of regulations to protect and replace significant trees as a minimization effort to avoid tree canopy loss. PSE encourages the County to analyze their tree policies (existing and proposed) through the lens of safety, reliability and resiliency as it pertains to electrical infrastructure. Utility corridors tend to follow transportation corridors however, that is not always possible. Tree protection policies need to support the operation and maintenance of electrical facilities in rights-of-way and utility corridors and not impact PSE’s need to provide reliable, resilient, safe, and cost effective electric service to the community.	PSE’s concerns on tree canopy proposals is noted and will be reviewed as the County continues to make improvements to any tree retention/replacement code and other development regulations as defined in the preferred alternative.	Letter	Multiple
225	Puget Sound Energy	In addition to vegetation management practices intended to reduce facilities/vegetation contact, PSE is now implementing a program called Public Safety Power Shutoff (PSPS). In this scenario, PSE will determine if a power shutoff is warranted to prevent the potential sparking of a wildfire. This generally would occur during drier times of the year and/or forecasted storm events. This PSPS is a preventive measure and supports PSE’s commitment to safety, reliability and resiliency. The County may consider including vegetation management and PSPS as mitigation measures for avoidance of wildfire events in the DEIS.	Thank you for your comment. This will be incorporated in the FEIS.	Letter	3.3.10
226	Puget Sound Energy	The following comment section is provided to the County to consider updating the existing electricity overview in the DEIS Comprehensive Plan update. “Electricity Overview Electricity service in Kitsap County is provided by Puget Sound Energy (PSE), which is a privately held, investor-owned utility formed in 1997 with the merger between Puget Sound Power & Light Company and Washington Natural Gas. PSE is the largest electric utility in Washington State, with more than one million electric customers and a service area of 6,000 square miles, primarily in the Puget Sound region. PSE electricity is generated from a variety of sources, including hydroelectric power, thermal power plants, coal, natural gas, wind power, and more. In 20132022, the PSE fuel mix for electricity was 31 23 percent coal, 32 27 percent hydroelectric, 28 23 percent natural gas, 7 16 percent wind, 10 percent unspecified, <1 percent nuclear, <1 percent solar and <1 percent other (Biomass, non-biogenic and petroleum). (Puget Sound Energy, 20152023) PSE in Kitsap County PSE serves over 127,960 electric customers in Kitsap County and maintains over 132 miles of high-voltage transmission and distribution lines throughout the county. (Puget Sound Energy, 2022) PSE also maintains 1,317 miles of overhead wire and 1,562 miles of underground cable along with 30 total substations. (Puget Sound Energy, 2022) Power is supplied to western Washington primarily from hydro generation stations along the midColumbia River and in Canada. Interregional 230 and 500 kV transmission lines carry power from the generating stations westward to PSE’s transmission switching stations and to transmission substations operated by the Bonneville Power Administration (BPA) in the Puget Sound region. The existing PSE electrical facilities inventory in unincorporated Kitsap County consist of the following: • Transmission Switching Stations – South Bremerton, Foss Corner, and Valley Junction, Foss Corner, Port Madison and Long Lake. • Transmission Substations– South Bremerton, Bremerton. • Distribution Substations – Port Gamble, Christensen’s Corner, Miller Bay, Silverdale, Central Kitsap, Bucklin Hill, Tracyton, McWilliams, Chico, Sinclair Inlet, South Keyport, Fernwood, Manchester, Long Lake, Fragaria, East Port Orchard, Sheridan, Rocky Point, Poulsbo, Bremerton, Port Madison, Murden Cove, and Winslow, Serwold, Kingston. Some of these substations are within city limits. • Transmission Lines 115 kV – Foss Corner-Salisbury PointPort Gamble, Foss Corner-Murden CovePort Madison, Bangor-Foss Corner, Port Madison Tap, Foss Corner-Keyport , Valley Junction-Foss Corner, Winslow Tap, Murden Cove Tap, Bremerton-Keyport, Bremerton-Navy Yard Foss CornerKeyport, South Bremerton-Bremerton, BPA Kitsap-Valley Junction, BPA Kitsap-South Bremerton #1, South BremertonValley Junction, O’BrienLong South Bremerton-Long Lake #1,, South Bremerton-Long Lake #2 and	Thank you for your comment. This will be incorporated in the FEIS.	Letter	3.3.10.1
227	Puget Sound Energy	Foss Corner-Keyport , Valley Junction-Foss Corner, Winslow Tap, Murden Cove Tap, Bremerton-Keyport, Bremerton-Navy Yard Foss CornerKeyport, South Bremerton-Bremerton, BPA Kitsap-Valley Junction, BPA Kitsap-South Bremerton #1, South BremertonValley Junction, O’BrienLong South Bremerton-Long Lake #1,, South Bremerton-Long Lake #2 and O’Brien-Long Lake, South Bremerton-Fernwood Tap, Fernwood Tie, and Bremerton-Navy Yard. Foss Corner - US Navy at Bangor, Miller Bay to Kingston. • Other Facilities – Command Point Cable Station and Salisbury Point Cable Station. (Kitsap County, 2023)	Thank you for your comment. This will be incorporated in the FEIS.	Letter	3.3.10.1
228	Puget Sound Energy	PSE has divided Kitsap County into two sub-areas (north and south) for the purposes of electric facilities planning. The North Kitsap sub-area is generally from Hood Canal in the north to Sinclair Inlet in the south. The South Kitsap sub-area is generally from Sinclair Inlet to the south county boundary. (Kitsap County, 2023) The north and south sub-areas receive power from a network of 115kV interconnecting transmission sources in the southern part of the county and transmission switching stations in central and northern Kitsap County. A 230 kV transmission source comes into Kitsap County via BPA lines to the BPA Kitsap substation in Gorst, then PSE has a short run of 230kV to their South Bremerton Substation. From there 115kV lines transmit power throughout Kitsap County. PSE also has a 115kV tie consisting of underwater submarine cables that connect PSE transmission networks in South Kitsap area and King County, via Vashon Island. This tie is operated normally-open and can be used to transfer part of South Kitsap area load to PSE King County transmission network during outages and system emergencies. Long-range plans are developed by PSE’s Total Energy System Planning Department and are based on system needs and electrical growth projections. County population projections produced by OFM are used to determine new load growth for the next 20 years. Projected load is calculated as the existing load combined with forecasted new load, with deduction for conservation reductions and demand side management. PSE’s future electrical facilities plan is based on an estimated normal peak winter load. PSE plans to construct additional transmission and distribution facilities to meet demand. The exact timing of individual projects will be determined by the rate of load growth in specific areas. Planned or pending projects are listed below. Two large electrical projects that are currently in the planning phases are provided below.	Thank you for your comment. This will be incorporated in the FEIS.	Letter	3.3.10.1

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229	Puget Sound Energy	<p>Kitsap Transmission Capacity Upgrade Project Start Date: Planning phase End Date: after 2028 PSE has identified transmission capacity needs on the 230 kV bulk transmission system serving Kitsap County, and the 115 kV transmission network local to Kitsap County for providing reliable service to existing load and meeting the projected load growth in Kitsap County. In addition, an aging infrastructure replacement need has been identified for the 115kV submarine cables that tie Kitsap County transmission network to King County via Vashon Island. The project is currently in planning phase. The final solution is expected to be determined by end of 2024 and energized after 2028.</p> <p>South Kitsap Distribution Capacity Need Date: 2030 Estimated Date of Operation: 2030</p>	Thank you for your comment. This will be incorporated in the FEIS.	Letter	3.3.10.1
230	Puget Sound Energy	<p>The South Kitsap area of Western has two existing substations with long feeder circuits running out to the south, east, and west edges of the PSE service territory in an area that has seen increased load growth. In order to meet increasing demand and meet service quality there is a study to add distribution capacity in the area. The project will likely include a new substation and create a 115 kV transmission loop in the area between the existing Fernwood and Fragaria substations. The study is planned to commence in Q1 2024 to be completed by Q4 2024. A final solution will be selected following a full Needs Assessment and Solution Study for the area. This project will address anticipated future load growth in the area and help alleviate upcoming capacity constraints.</p> <p>Project Name Location Project Need Estimated Start-End Dates Status Southeast Salmonberry Road electric reliability improvements Port Orchard, 98366 Electrical, System Improvement Start Date: 12/1/2022 End Date: 4/30/2023 In Construction West Belfair Valley Road electric system upgrade Bremerton, 98312 Electric, System Improvement TBA, in permitting stage Permitting Northeast West Kingston Road Kingston, 98346 Electric, System Improvement Start Date: 4/3/2023 End Date: 8/31/2023 Pending Construction Start Hansville Road Northeast electric system upgrade Kingston, 98346 Electric, System Improvement Start Date: 10/24/2023 End Date :6/30/2024 In Construction Highway 3 electric system upgrade Poulsbo, 98370 Electric, System Improvement Start Date: 8/26/2019 Pending Construction Start Northwest Lofall Road electric system upgrade Poulsbo, 98370 Electric, System Improvement Start Date:1/1/2022 Pending Construction Start Source: Puget Sound Energy”</p>	Thank you for your comment. This will be incorporated in the FEIS.	Letter	3.3.10.1
231	Robin Salthouse	<p>Alternative 2 land use is the best choice for meeting Kitsap County's future growth needs and from preventing sprawl in rural areas.Reclassifying rural wooded property like #27 (Jon Rose) on the Reclassification Request will not allow Kitsap County to meet the proposed goals, policies and strategies found in the Draft Comprehensive Plan. Focusing on UGAs will effectively meet the strategies in the Transportation goal of multi-modal transportation and moving people not vehicles. Public transit systems that serve a concentrated population makes sense.</p>	Thank you for your comment. Your feedback on the alternatives will be forwarded to County decision makers.	Email	2.5
232	Robin Salthouse	<p>Future budgets and strategies to provide safe non-motorized transit for moving people to jobs, schools healthcare, businesses, and our ferries is more sustainable than funding trails that could damage existing heritage park habitat, and serve fewer people. Safe non-motorized trails will take pressure off our roads, provide health benefits, and not contribute to added Greenhouse Gas Emissions</p>	The Parks and Transportation departments both have project funding priorities to allocate their available and future funding to non-motorized facilities and trails. Greenhouse Gass Emissions and health benefits are priotities for both departments. These priorities are reflected in the Goals Policies and Strategies of the Parks, Transportation and Capital Facilities Elements.	Email	2.5
233	Robin Salthouse	<p>Reclassifying land along a Washington state routes or county roads could further worsen Levels of Service (LOS). Any improvements or expansion along state roads in Kitsap County will require our state legislators to approve funding for feasibility studies, design and construction which will take years to complete. The current Kitsap County transportation budget does not support road improvements due to increases in traffic created by sprawl. The Draft Capital Facilities Plan states the future average Level of Service for County roads is at a C or D grade (p.109/140). Deteriorating traffic flow will only worsen the strategies to reduce Greenhouse Gas Emissions stated in the Climate goal.</p>	Adverse impacts related to the proposed alternatives are mitigated to the maximum extent feasible. The comment is noted and forwarded to County decision makers.	Email	3.2.6
234	Robin Salthouse	<p>People live in Kitsap County to enjoy the natural open spaces, the biodiversity in our heritage parks, a healthy lifestyle, and roads that are not snarled in gridlock.</p>	Thank you for your comment. Your feedback on the alternatives will be forwarded to County decision makers.	Email	Multiple
235	Wendy Arness	<p>I am writing regarding Parcels 252702-2-022-2004 and 262702-1-003-2008 which are located just north of the current Kingston UGA, north and east of the Alternative #2 UGA proposal and are included in the Alternative #3 UGA planning option. These parcels are currently zoned RR or “Low -density residential development and agricultural activities.” I strongly advocate these parcels be included in the UGA or Urban density (Medium) to allow for a higher density Comprehensive Plan and zoning designation as part of the Kitsap County Comprehensive plan update. This change would meet many of the stated goals in the draft Environmental Impact Statement (EIS) and would also be beneficial to the community for the following reasons: 1. Growth and demand for housing in Kingston: a) The Kingston area is expected to experience significant growth within the coming years and needs additional housing options to maintain affordability. The draft EIS indicates the target population in 2044 is expected to rise to 5,556, up over 3,000 additional people from 2020 census levels. This kind of growth is going to require all types of housing options on land adjacent to municipal services. b) Both these properties are currently adjacent to the existing UGA which would allow for efficient use of land and minimize sprawl. For Example, parcel 4304-001-001-0101 immediately south of parcels 2004 and 2008 is currently zoned Urban Medium Residential (UM) and appears to make accommodations for future extension of Gravity Avenue to the southern boundary of parcel 2004 and 2008 when additional phases of the Cherry Hill Plat are recorded. The proposed UM comp. designation under Alternative #3 would be consistent with the Cherry Hill development and would allow for consistent development patterns between the parcels. Expanding the UGA would allow development close to the existing community core and in proximity to businesses and available transportation (highways, arterials and the ferry). (Goals and Policies- Environmental Policy 1.5 1.a and 1.b) c) According to MPP-RGS-11 in the draft EIS, incorporating additional properties into the UGA for Kingston would “Encourage growth in designated countywide centers.” And would help reduce more intensive development patterns in other areas of the county.</p>	Thank you for your comment. Your feedback on the UGA will be forwarded to County decision makers.	Letter	2.4

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
236	Wendy Arness	<p>2. More efficient use of Infrastructure and Utilities: a) The County could better utilize existing infrastructure including roads, public transportation, utilities and reduce the environmental impact and costs associated with extending services to more rural areas as these lots are close to the current and future planned urban development. b) The Kingston 20-Year CIP Overview Map indicates that sewer already extends to the southern boundary of 2004 and 2008 through the Cherry Hill development to the south. This could potentially allow for an extension of services from Cherry Hill to serve future development on both 2004 and 2008. There is also sewer that extends along Ohio Avenue to the east of 2004 and 2008. c) During a previous Comp. Plan cycle parcels 262702-1-008-2003 and 262702-1-007-2004 were brought into the UGA under the UM designation. Those properties don't appear to be adjacent to any municipal/urban services and therefore, have yet to develop. Proximity to urban services plays a fundamental role in the development of property to urban densities. d) Kingston is classified as a "High-Capacity Transit Community" with ample access to the ferry system for commuters. Allowing for additional growth would allow more people to reside in a walkable community and minimize private vehicles by having housing closer to the ferry system, stores, or other important community amenities. This is consistent with the EIS goals for fewer vehicles, less emissions, pollutants and reduced greenhouse gasses. Having a walkable community will enhance the economy and bolster the downtown businesses.</p>	Thank you for your comment. Your feedback on the UGA will be forwarded to County decision makers.	Letter	2.4
237	Wendy Arness	<p>I strongly believe that allowing denser development in these lots could benefit the community and makes sense from a planning and zoning standpoint. With anticipated growth for the community, having additional properties close to the community core and adjacent to urban services would be an asset to the community to help provide affordable housing options. Although I am a proponent of expanding the UGA, I am not supportive of all proposed elements of Alternative #3 (even though it includes parcels 2004 and 2008 in the UGA zoning increase). This alternative increases the potential for sprawl and does not keep the community center localized. I do, however, believe that these parcels could be included in the UGA, and additional housing allowed in Alternative #2 to make a better-rounded plan for urban growth. It would allow for diverse housing and adhere to the EIS goals of reducing greenhouse gasses with a "walkable transit oriented" community, and "Compact growth" and an "Urban center focus." Finally, adding these parcels to the UGA could allow for a well-designed housing community complete with green spaces and possible parks and trails nearby. All of which help create a healthy community and allows for growth without diminishing the Kingston charm. In conclusion, incorporating these parcels into the County's UGA would be a balanced approach to the anticipated growth and development in the Kingston area. It would meet current and future housing needs, align with smart growth principles, meet planning goals in the draft EIS, maintain community character, and address the critical need for affordable and diverse housing. I urge the Kitsap County Planning Commission and the County Commissioners to consider this proposal. Thank You for your consideration.</p>	Thank you for your comment. Your feedback on the UGA will be forwarded to County decision makers.	Letter	2.4
238	Beverly Parsons	<p>I have read through the "Public Comments Received through February 9, 2024 on the DEIS" posted on the county website. Rather than repeat what has been said, I want to add my voice in support of what has been posted by Mayor Rebecca Erickson, Coleen Shoudy, Dave Shorett, Port Gamble S'Klallam Tribe, Doug Hayman, Rob Salthouse, and Beth Nichols. Additionally, In preparing to making comments, I realized that I'm not clear on a fundamental issue about how the DEIS is conducted. What do you consider the baseline for the EIS of each alternative? We need a baseline that goes back much further than the current situation or even 2016 (the most recent Comp Plan). We are experiencing the degradation of the environment by a thousand cuts over time. Can an EIS be done using a baseline of the late 1990's or even 2000? This is probably not something you can do; if not, please call attention to this issue when presenting the EIS to the Commissioners and the public.</p>	Thank you for your comment. Your feedback will be considered by the Board. Generally speaking, the "baseline" of an EIS is existing conditions. The goal of the document is to analyze potential environmental impacts of the comprehensive plan update, including map and policy changes needed to accommodate projected growth and comply with state law and regional policies. The different "alternatives" act as different scenarios where the County takes different approaches to accomplishing these goals, including no changes (Alternative 1, the "no action" alternative). In that sense, the existing comp plan (2016) is considered to be the "baseline." A baseline going back to prior periods wouldn't be possible because the plans and codes in place at that time have been superseded by current plans and codes.	Email	1
239	Emilee Ashby	<p>I appreciate the county's due diligence when creating the draft environmental impact statement for the 2024 Comprehensive Plan for Kitsap County. I would like to bring attention to the devastating environmental consequences that the expansion of the UGA along Phillips Rd in Port Orchard would result in. Specifically, reclassification request #49, which would rezone 20 acres of forest, wetlands and other critical habitat from 1 home per 5acres, to 5-9homes per acre. The owners of this land would then have a total of 40 acres in the UGA, to be sold to the highest bidder, with the potential of 360 homes on the banks of critical areas including a large section of Cool Creek, a fish bearing stream.</p> <p>Please consider the following prior to making your decision: This 20 acres of land was left out of the UGA in 2016, largely due to a community effort that shed light on the environmental concerns that development of this land will bring. The environmental concerns that we had in 2016 have only been amplified today, between the threat of climate change and urban sprawl. According to our state government, (stateofsalmon.wa.gov), our coho salmon population in WA state remains unstable and is particularly susceptible to changes in conditions. Coho salmon have historically spawned in Cool Creek and the numbers, although are not what they once were, have shown promise in the past years. My family has spent years working with local conservation efforts to make our property, (which is located upstream from the land in request #49), an optimal habitat for this unique species of salmon. If reclassification request #49 is considered, it would allow many homes to be built on the banks of critical wetland and salmon habitat, that will absolutely put the native Coho salmon population in real danger of non-existence. And all of our family's efforts over the past decades will have been for nothing.</p> <p>Although I appreciate the need for more housing opportunities in Port Orchard, reducing forested land and expanding the UGA in order to increase the number of single family residences does nothing to contribute to affordable housing, and it reduces the rural feel of our community. Housing diversity and limiting urban sprawl is not attained in Port Orchard with Alternative 3, specifically Request #49.</p> <p>I urge the County and our Commissioners to adopt Alternative 2 in Port Orchard and to not adopt Reclassification Request #49 as part of our Comprehensive Plan Update.</p>	Thank you for your comments. Your feedback on reclassification request #49 and Alternative 2 will be considered by the Board.	Email	1.3
240	Ken Rice	<p>I am formally requesting that Option 2 be adopted. The area is ripe with old growth forests and a fish bearing stream. The Phillips Road corridor cannot handle any more high density development.</p> <p>Let's keep the rural areas as they are, we are quickly running out of natural, pristine land for the sake of "affordable housing", there is no way to develop the land that is in question without spending millions of dollars to build on slopes, near wetlands and streams, and somehow mitigate the effects of traffic on our environment. The cost to develop would eliminate any possibility of "affordable housing".</p> <p>Maybe look at transforming some of the industrial/commercial that no one is allowed develop into areas where the infrastructure is already in place.</p>	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Email	1.3

DEIS Public Comment Response Matrix

#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
241	Anonymous	Future transportation project funding will not have the impact to reduce vehicle use and increase safe non-motorized trails. Specifically along SR 307 and 104, and S. Kingston RD NE along the Arborwood housing development. More public transit and multi-use trails will need to be funded. Focused non-motorized projects are needed to move users to schools, jobs, healthcare, businesses and ferries. The trail system needs to be addressed from rural to UGA areas. The STO trails will serve a relatively small number of users with funding for those projects appropriated for trails to improve transportation along routes that reduce vehicle miles, greenhouse gas emissions, tire particle pollution, improve the climate, and provide safe, healthy recreation. Projected LOS will further degrade, especially when Arborwood builds out, Port Gamble development begins, and additional housing and businesses come online in UGAs.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Email	3.2.6
242	Anthony Augello	Kitsap County is being destroyed. My family and I left Port Orchard in 2010, and we returned just a couple of years ago. The deterioration of Kitsap County is painfully evident. The Visit Kitsap Peninsula website states, "The Kitsap Peninsula is blessed with an abundance of natural beauty and many opportunities to enjoy safe and healthy outdoor recreational activities all year round. Whether visiting or living in the region, when out touring the town or hiking the trails, please follow official health guidelines as you Discover the Treasures Around the Kitsap Peninsula." It's only a matter of time before these statements will need to be changed on the website, because how Kitsap County is defined is becoming obsolete. Reckless promoting of apartment complex developments and smaller lots that have mushroomed everywhere from Port Orchard up to Poulsbo without even having a demand for them are more than just ruining the landscape. Eric Baker presented a persuasive speech about how even more multifamily and smaller house development is needed and a necessity. Furthermore, he is trying to pigeonhole such development according to income levels. This is not how economies successfully work, and only guarantees eventual slums (hence the word "projects") that will only contribute more to the overall demise and decay of Kitsap. He is even promoting high rise buildings (on the verge of skyscrapers) in areas such as Kingston and Silverdale, which is in complete contradiction to the culture of the Peninsula. History across America has shown that prosperous economies thrive only when the natural laws of supply and demand are permitted to work without government interference, and in this case the magnitude of the proposed interference is phenomenal. Kitsap County needs to be much more responsible of what we are funding. Very recently Port Orchard (and truly all of Kitsap County) made headlines in USA Today with the Mexican drug cartel (CJNG) now firmly entrenched here. This happened due Kitsap County "leaders" slashing police funding, which is another very apparent observation we have seen since returning to Kitsap County. The increase in crime (including criminals having no fear of committing it), anarchy on the roadways, and garbage scattered everywhere on roadsides highlight the surreal changes we have observed since our return. Taxpayer funds should be more dedicated to fixing real problems such as protection that government funding is meant to fix, not trying "put the cart before the horse" committed to a population increase and excessive development.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Email	Multiple
243	Anthony Augello	Eric Baker used phrases like "we need to do this" for population growth and "we must do that". He has asserted a "necessity" for population growth without even supporting what the residents of Kitsap County truly desire, and the reasons (as was also echoed in the meeting) that people relocated to Kitsap County in the first place. On the contrary, Eric Baker promotes urbanizing Kitsap County to look more like Seattle/King County as a mission, even though he does so in complete opposition to what the overwhelming majority of Kitsap County residents desire based on the outpour of the community in the latest meeting. He should be trying to lead Kitsap County in line with the culture and fabric that make Kitsap County a unique place to live. There are SEPA regulations, wildlife corridors, and potential historic preservation areas abound throughout the entire county. However, he failed to truly mention these as viable alternatives, even though the overwhelming majority of taxpayer residents prefer these alternatives for the comprehensive growth plan. I pray for our leaders, and hope they will focus on what they should be focusing on. Supposedly Kitsap County leaders are committed to "climate change". If this is true, Kitsap County leaders should be presenting to the governor the significant natural habitats and biodiversity that Kitsap offers and that must be protected (according to law). However, Eric Baker is trying to promote urban growth areas (UGAs) in such areas as Enetai without even considering that more than 90% of the Enetai residents do not want this (for obvious reasons). Enetai has aquifers and steep/unbuildable slopes and is home to wildlife such as bald eagles and lynx, yet it is being proposed to tear down this old growth forest area so that one developer can build 189 homes on 37 acres. This is beyond comprehension! He should be arguing for Kitsap County's behalf that 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 natural habitats and biodiversity can NEVER be replaced. Once it is gone, it is gone forever. Enetai is one of the primary areas that visitors and tourists see when they come to the Kitsap Peninsula on the ferry. What is being proposed is a true eyesore on the shoreline. Also, who even authorized the zoning exception for this to potentially occur? This itself warrants more investigation and research. I am not against development. In fact, I've had my own development company and assisted with the Manchester Community Plan in 2008. However, development should be done responsibly and without government purposefully attempting to destroy the natural process of supply and demand by violating laws and zoning.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Email	Multiple
244	Beverly Parsons	Neither the draft EIS nor the draft Comp Plan adequately addresses or evaluates the so-called "Framework" for the Port Gamble Heritage Park as required under GMA as the County said would be done. The park plan is effectively a proposed revision to the Comprehensive Plan, so it needs to be included in this EIS. It is not sufficient to vaguely say it is incorporated by "reference" especially since there remains significant environmental impacts that are not described nor addressed. The EIS and plan should acknowledge that significant issues remain with this proposed park plan related to such things as priority given to conservation and preservation of critical natural resources, delineation of critical areas such as wetlands and streams, landscape delineations, trail design and standards, usage, etc. Further, all environmental impacts of the park plan need 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 FEIS, then it will be opening itself to potential legal challenges regarding the scope and adequacy of the County's SEPA review.	Thank you for your feedback. Additional detail on the Port Gamble Heritage Park will be provided in the final EIS.	Email	3.3.4.2
245	Beverly Parsons	Regarding Section 3.2 on 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.	Thank you for your feedback.	Email	3.2

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
246	Dana Sweany-Schumacher	I am concerned about the seeming lack of room made in the various proposals for retention of stands of mature urban trees. While urban density and preservation of rural lands is important to help our communities weather both the influx of population projected and the impacts of climate change, focusing solely on density to the detriment of preserving the remnants of urban forests is foolhardy given the crucial role that mature trees play in urban settings. A single grove of mature Douglas firs in an urban setting can shade dozens of homes and businesses. They act as air scrubbers, and they mitigate stormwater headaches. They also act as small oases to protect pockets of urban wildlife. While tree replacement is a good start in urban planning and zoning, it will take a hundred years or more for current stands of native mature trees to truly be replaced. That is 100 years of their benefit being lost to our communities in the name of density when heat indexes are climbing, air scrubbing is ever-more important, and our area is projected to see more storms, wetter weather, and additional flooding. While density is crucial, the need for balance is important. At a time when our state is offering communities millions in grants to preserve stands of mature urban trees due to recognition of their unique and vital importance, I fear that Kitsap is about to adopt a Comprehensive Plan without a tree retention provision in urban settings. In 2024, the idea that this would not be included is worrying to say the least. Our neighborhood in downtown Kingston recently appealed a DCD decision to allow the destruction of the tallest and oldest stand of native firs in the Kingston UVC. Those trees, which are going to be cut down to make way for four single family homes, currently shade more than fifty households including the homes of dozens of vulnerable seniors and disabled residents at the Martha and Mary complex at the Village Green. Some of those trees stand over 160 feet and are used daily by both Osprey and Eagles. The impending destruction of this resource to our community and to local wildlife will be a huge loss, and while these particular trees are slated to be victims of density over all else, I'm hoping that we can do better in the future for other mature stands of urban trees, recognizing their vital importance for helping urban communities weather what is coming,	The preferred alternative likely will explore enhanced critical areas requirements and address new critical area buffers, which will increase tree canopy. Kitsap County is also exploring tree retention on land not encumbered by critical areas or their buffers. The EIS was developed with best information available at the time.	Email	3.1.4
247	Kitsap Community Advisory Council	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.	Thank you for your comment. The June 2023 letter is being considered by County decision makers.	Letter	Multiple
248	Kitsap Community Advisory Council	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.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Letter	2.4
249	Kitsap Community Advisory Council	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.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Letter	2.5.8
250	Kitsap Community Advisory Council	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.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Letter	2.5.8
251	Marion Allen	Alternative 2: fits GMA putting growth in the UGA's. This would be the best application and should be the only alternative considered for growth and while also protecting our rural areas for farming and for keeping clean watersheds.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Letter	2.4
252	Marion Allen	3.3.3.4 Heritage Parks: Port Gamble Forest Heritage Park as included in the draft Comp plan needs to be assessed under this EIS. There have been no delineations of wetlands in the park which is a great oversight. What is meant by a heritage park and why is this considered a heritage park? I would imagine it is called a heritage park because it was previously inhabited by the indigenous people for centuries, but there is no indication here that this is what happened. Only a leftover of the logging industry yet instead of loggers raking over the land we now let mountain bikers destroying the park.	Port Gamble Framework is a reference document, not being adopted by reference or ordinance, and not a subarea plan. All future decisions related to this will have to go through environmental review as appropriate. Language in the Final EIS related to the Port Gamble Framework will be revised to make sure this is clear.	Letter	3.3.3.4
253	Marion Allen	3.1.4.1 Rhododendron macrophyllum is an important native plant in Kitsap County and should be listed here. Also, in this section scotch broom and Himalayan blackberry need to be listed as nonnative, invasive shrubs.	The County will take a closer look at the plant list in the Final EIS with regard to rhododendron, scotch broom, and Himalayan blackberry.	Letter	3.1.4.1
254	Marion Allen	Table 3.1.4.1-3 Should Port Gamble Bay herring be listed as declining?	The County will re-examine Port Gamble Bay herring and make a determination whether they should be listed as declining in the Final EIS.	Letter	3.1.4.1
255	Marion Allen	3.2.6.1 Regarding the STO/NSTO there is currently no construction to be done in 2024 and this should not be included here unless an EIS will or has been done. There are toxic effects of asphalt on the environment as well as toxic effects of the tires from bicycles. See this article: https://washingtonstatestandard.com/2023/08/01/tribes-call-for-feds-to-ban-chemical-in-car-tires-that-is-linked-to-salmon-deaths/ And https://ecology.wa.gov/Water-Shorelines/Puget-Sound/Issues-problems/Toxic-chemicals	Thank you for your feedback. Your comment will be forwarded to County decision makers.	Letter	3.2.6.1
256	Marion Allen	Also, regarding nonmotorized transportation: This is one of the key things we should be concerned with, the effects of all our fossil fuel cars on the environment. The concept of the STO/NSTO is not an efficient plan for a nonmotorized transportation system. It is, at best a developer's plan for a developer rather than a plan for common sense use for the county. With some rerouting done it would be a much better plan. Putting a paved road through our heritage parks is nothing but a disaster to the environment. The plan should be around the UGA's, neighborhoods and schools so people can get to the everyday places they go, not for tourists to ride around the county on a highly expensive, barely used asphalt trail that goes through our heritage parks and causes pollution via asphalt and rubber tires.	Thank you for your feedback. Your comment will be forwarded to County decision makers.	Letter	3.2.6
257	Marion Allen	3.2.6.1-13 This map is only a conceptualization.	Exhibit 3.2.6.1-13 shows both existing and conceptual non-motorized routes. Conceptual routes are labeled as dashed lines.	Letter	3.2.6.1

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
258	Marion Allen	Question: Why does the dEIS not address climate change?	We have integrated climate change across the EIS – specifically GHG emissions associated with different alternatives as well as various climate risks and hazards. The discussion discusses various impacts and interactions – such as impacts to streams, temperature, runoff, and recharge. Various proposed policies move beyond this to support climate resiliency within the County, including tree canopy policies and water quality policies (e.g., nutrient loading and ocean acidification interactions).	Letter	3.1.2
259	Suquamish Citizens Advisory Council	After careful and thorough review of the EIS and its review and analysis of the potential, irreversible adverse impacts to the natural and human environment, we are concerned that there are areas in the EIS that do not fully discuss nor mitigate environmental impacts connected with the alternatives, especially Alternative 2 (Dense Centers) and Alternative 3 (Dispersed Growth). This is very concerning to the Suquamish Subarea and the North Kitsap region within which Suquamish exists. We believe these areas of incomplete review and analysis must be corrected before the publication of the final EIS, final preferred alternative and final Comprehensive Plan.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Letter	Multiple
260	Suquamish Citizens Advisory Council	Proposed Upzoning of lands in North Kitsap Rural Areas. The upzoning of hundreds of acres of forested zoned land from 1 dwelling unit per twenty acres to 1 dwelling unit per five acres on Bond Road is absurd. The analysis of the impacts of this proposal on the human and natural environment is incomplete and unacceptable. The Suquamish subarea stands to be significantly and irreversibly impacted by the intense densification of large acreage in the region that includes the Suquamish subarea. Impacts on traffic flow, roadway quality, pedestrian uses, water resources and populations of birds, fish and wildlife dependent on forested zoned lands are significant. This is true even though forested-zoned lands are harvested and replanted. Further, the EIS relies upon existing development standards (e.g., critical areas and stormwater regulations) as mitigation measures. Under the State Environmental Policy Act (SEPA), the impacts discussed in an EIS are assumed to already be subject to existing regulations. The impacts associated with this large, atypical upzoning remain even after applicable development standards and related ‘programmatic’ measures are applied. Measures other than existing regulations, such as in-kind (e.g., preservation ratios) and out-of-kind (e.g., offsite preservation, in-lieu fee, etc.) are required to be considered in mitigating probable adverse impacts to the human and natural environment. We believe the preparation of a second draft EIS be considered that fully analyzes mitigation measures, as required by SEPA, that contemplate actions outside of the application of existing programs and standards.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Letter	2.5
261	Suquamish Citizens Advisory Council	Connecting New Standards to Alternatives. We are concerned that the imposition of certain, selected new standards has not been adequately analyzed or discussed. First, we note the removal of lot consolidation for the Suquamish Subarea as discussed solely in Alternative 3. We understand that the impetus of this removal is to encourage higher housing production. This new proposed prohibition on lot consolidation does not appear to consider that substantial areas in the Suquamish Subarea are still reliant on septic systems and do not have access to municipal wastewater treatment. This does not appear to have been considered. We propose that lot consolidation be optional and not prohibited.	Thank you for your comment. Additional detail on the lot consolidation removal in the Suquamish Subarea will be provided in the Final EIS.	Letter	Multiple
262	Suquamish Citizens Advisory Council	Second, we believe Accessory Dwelling Units should be analyzed on both alternatives.	Thank you for your comment. Capacity for Accessory Dwelling Units has been included in the Land Capacity Analysis that calculated housing unit capacity for each alternative.	Letter	3.2.3
263	Suquamish Citizens Advisory Council	Third, we note that the proposal for expanded stream protections (expanded buffers and management areas) is described only in Alternative 3 and not in Alternative 2. During a public open house recently held in Suquamish, county staff gave details that expanded stream protection would only be needed because only in Alternative 3 there is conceived to be dispersed growth which may put more pressure on critical areas and their buffers, including streams. We disagree with this reasoning. Under both Alternatives, increased impacts to regulated streams and their buffers exist. We believe the expanded buffer and other stream protections should have been a component of both Alternatives.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Letter	3.1.3
264	Suquamish Citizens Advisory Council	Tree Protection and Retention Missing from the Draft EIS and Comprehensive Plan update. We are disappointed that the County has not joined other nearby jurisdictions to propose regulations specifically to protect and retain mature trees. Regulating the retention of trees, tree cover and mature tree canopies provide numerous benefits to the human and natural environment and ameliorate effects of climate change. Particularly in the rural areas of North Kitsap where valuable, mature, intact forest tracts exist, there is urgently needed land use and environmental controls to protect trees. We are deeply dismayed that the County proposes heavy decreases in rural wooded and rural protection acres. Confusingly, under Alternative 3 only, tree retention is not applicable to rural zones – precisely where tree protection is needed most. Similarly, the EIS blatantly describes tree conservation solely in terms of tree replacement after development occurs. We believe this is shortsighted and believe a revised draft EIS should include and analyze tree protections to address climate change, and to preserve and protect the human and natural environment.	The preferred alternative likely will explore enhanced critical areas requirements and address new critical area buffers, which will increase tree canopy. Kitsap County is also exploring tree retention on land not encumbered by critical areas or their buffers. The EIS was developed with best information available at the time.	Letter	3.1.4
265	Anonymous	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.)	Thank you for your comments. Your feedback on the alternatives and the rezone will be forwarded to County decision makers.	Letter	2.4
266	Berni Kenworthy	The forthcoming update to the Kitsap County Critical Areas Ordinance will require an update to the county's buildable lands and land capacity analyses. How is this version of the draft Comprehensive Plan EIS anticipating changes that may occur as a result of the new CAO?	CAO response - The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter	3.1
267	Berni Kenworthy	In support of the expansion of MTFE zones and other affordable housing incentives for all alternatives.	Thank you for your comment. Your feedback will be forwarded to County decision makers.		3.2.3
268	Berni Kenworthy	The preferred alternative should be a combination of the affordable housing and centered growth incentives from Alternative 2 combined with some expansion of single-family zoning in Alternative 3. This would provide Kitsap citizens a range of housing options and price points while recognizing the housing shortage crisis.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Letter	1.5
269	Berni Kenworthy	It is noted that Alternative 2 falls short by 957 jobs. How does the county propose to reconcile this discrepancy?	The Board will be considering additional employment opportunities in its selection of the preferred alternative.	Letter	1.5
270	Berni Kenworthy	Alternative 3 comes in fairly close to the growth target. Will this number fall short after the CAO update?	Further analysis of the capacity under each alternative will be completed once the CAO is complete and will be included in the final EIS.	Letter	1.5
271	Berni Kenworthy	The county requires traffic impact fees. Shouldn't they be counted as a mitigation measure under this section?	Thank you for your comment. This is a good suggestion and will be forwarded to County decision makers for inclusion in the final EIS.	Letter	1.5

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
272	Berni Kenworthy	Under "Growth Accomodation" it is noted that Alternative 2 generally meets employment targets yet is short by almost 1000 jobs. What number of jobs (+/-) does the county consider to be meeting job targets?	The Board will be considering additional employment opportunities in its selection of the preferred alternative. There is not a set threshold that is considered "close enough."	Letter	2.4.2
273	Berni Kenworthy	Consider reducing the minimum density of the commercial zones in Alternative 2 from 19 to 10 du/ac?	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Letter	2.5.1
274	Berni Kenworthy	For Alternative 3 under 'Countywide', individual garage units should count as required parking under all alternatives.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Letter	2.5.1
275	Berni Kenworthy	The requirements under Alternative 2 Tree Replacement Proposal are not clear. What happens if the existing site does not contain trees? What is a legacy tree? Do street trees, required landscaping, and trees within critical areas count? What is the requirement for surveying existing trees?	As currently proposed, a site would need to achieve a certain tree unit density. If a site does not contain trees, it would still need to be replanted to achieve the overall tree unit density. As currently proposed, required landscaping and critical areas could count toward tree requirements. Street trees are still being considered. Existing trees would need to be surveyed and could count toward the overall tree unit density requirement. Please note that the preferred alternative will establish if the County will pursue a tree retention/replacement standard and further updates to tree code is then expected through 2024.	Letter	2.5.1
276	Berni Kenworthy	It appears that Alternative 3 requires tree retention but does not allow for tree replacement. It seems problematic to implement tree retention without a provision for replacement. For example, what if the only trees on site are located at the only point of access for the parcel?	The preferred alternative likely will explore enhanced critical areas requirements and address new critical area buffers, which will increase tree canopy. Kitsap County is also exploring tree retention on land not encumbered by critical areas or their buffers. The EIS was developed with best information available at the time.	Letter	2.5.1
277	Berni Kenworthy	Were tree replacement and retention requirements considered in the land capacity/buildable lands calculations?	The preferred alternative likely will explore enhanced critical areas requirements and address new critical area buffers, which will increase tree canopy. Kitsap County is also exploring tree retention on land not encumbered by critical areas or their buffers. If the preferred alternative includes tree retention requirements, an appropriate assumption will be made as to that impact on land capacity.	Letter	2.5.1
278	Berni Kenworthy	Why was 'Human Services' removed as part of the 'Housing Element'? Where was the 'Glossary' moved?	Noted. The County will be furnishing separate comment responses on the comprehensive plan.	Letter	2.5.6
279	Berni Kenworthy	The notes under this goal indicate that permitting goals are met for all alternatives. Current permit timelines are not currently meeting code requirements. Please explain how these alternative will meet permitting timeline goals when the no action alternative is not meeting these goals?	Thank you for you comment. Alternative 2 did include a potential expedited permitting process for projects in Centers. The County is considering different process improvements related to permitting timelines. The County will also be subject to new Senate Bill 5290, which establishes new requirements for permmtting timeframes, effective starting in 2025.	Letter	3.2.2.2
280	Berni Kenworthy	If 'funding redirects' are ended that currently go to the sherrif and community development, how will the resultant shortfall for those departments be mitigated?	Thank you for your comment. The Board of Commissioners determine funding allocations on an annual basis. The application of this strategy would have to carefully consider the needs of other County services.	Letter	3.2.6.3
281	Berni Kenworthy	Aren't bullet points 3-5 already part of the county code, road standards and fire standards? Or are these points referring to expansion of the requirements already set forth in code? Expand on the meaning of the last bullet.	Thank you for your feedback. These points will be clarified in the FEIS to include context. The points are meant to describe the continued adoption of county regulations.	Letter	3.3.2.3
282	Berni Kenworthy	Note that the heading number is incorrect.	This will be corrected in the final EIS.	Letter	3.1.1.1
283	Berni Kenworthy	Another potential mitigation measure would be for the county to create or incentivize regional stormwater treatment systems.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Letter	3.1.1.1
284	Beth Berglund	Re: the DEIS, I second the substantive comments submitted by Betsy Cooper, David Shorett, the Port Gamble S'Klallam Tribe, Doug Hammond, and Beth Nichols.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Email	Multiple
285	Beth Berglund	Re: the Alt 3 proposed re-zone and proposed future use of the 400+ acres owned by Raydient North Kitsap LLC adjacent to the Port Gamble Forest Heritage Park, I share the concerns expressed by Poulsbo Mayor Becky Erickson / Poulsbo City Council, the Port Gamble S'Klallam Tribe, and Rob Salthouse. Per the goals of the Growth Management Act, this level of investment belongs inside urban growth areas (UGAs) or existing LAMIRDS where it can be served effectively by public transit, where it can support the economy of the UGA, and where it doesn't create a new investment hub and driver of sprawl. The plan for meeting club sport field needs should focus on (1) supporting Poulsbo's PERC project while also investing in improvements to existing fields at (2) our NKSD schools, (3) private schools, and (4) our community parks (i.e., Kingston Kola Kole). The Port Gamble Redevelopment and the PGFHP include plans that will dramatically increase traffic in this rural section of NK. We shouldn't voluntarily allow development so misaligned with smart growth planning principles.	Thank you for your comments. Your feedback on the rural rezone and Port Gamble Heritage Park will be forwarded to County decision makers.	Email	2.4

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
286	Bobbie Moore	<p>Parks and Recreation:</p> <p>Regarding 3.3.4.2, The EIS emphasizes access to passive recreation at the expense of active recreation, particularly sports fields. I acknowledge that for me and my demographic (retired Baby-Boomer, no children living with us), passive recreation opportunities are one of the great draws to Kitsap County living. Nevertheless, the county's growth will have to consist of a diversity of demographics; most of the growth won't resemble me and my situation. Families already have a shortage of places for youth and adults to engage in sports activities. The present allocation of active sports facilities leaves North Kitsap out almost entirely. So I reason that the stated impacts of any of the alternatives must include the present sports facilities deficits as well as what will surely be increased deficits owing to projected growth. Because the PROS plan is not yet ready, there's an absence of data to support any of the three alternatives and their associated Levels of Service. Intuitively, it seems the best alternative for accommodating more active sports facilities is Number 3. The As-is condition is clearly not sufficient; Alternative 2 makes reference to increased parks but we know from observation in Kingston that there is no location for increased parks. The existing (2012) PROS plan reports that School Districts provide most of the active athletic facilities. Reports from parents of primary and secondary school kids confirm what my own family has observed over the years: School District facilities are in poor shape, are overbooked, and are nearly always primarily devoted to use by the schools themselves. This facilities gap will not be addressed before the next Comp Plan and its impacts should be mitigated with this Plan. The North Kitsap United project would be accommodated by Alternative 3 and would be a viable approach to addressing the facilities gap.</p> <p>Recommendations:</p> <p>First, keep the Draft EIS comment period open until the PROS plan data have been gathered and summarized. Second, prioritize active recreation in the EIS. It deserves to be considered on a par with passive recreation. Third, Alternative 3 makes the most sense to me.</p>	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Email	3.3.4.2
287	Carol Price	I am in support of many of the comments already made by Coleen Shoudy, Dave Shorett, Doug Hayman, Beth Nichols, and others. Comments submitted in the letter from the Port Gamble S'Klallam Tribe are particularly significant. They make the case for adoption of Net Ecological Gain as a County standard.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Email	3.1.3.1
288	Carol Price	Critical Area Ordinance regulations need enforcing, especially in reference to wetlands, streams, and the shoreline. Buffers around these water ways need to be honored and enforced, and variances for buffers are not appropriate. Property owners must be held to a higher standard in their responsibilities towards the environment.	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Email	Multiple
289	Cathy Ridley	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.	Noted. Thank you for the comment. Your feedback will be forwarded to County decision makers.	Email	2.4
290	City of Bremerton	<p>Central Kitsap Urban Growth Area (CK-UGA). As noted in December 2023 Draft Environmental Impact Statement, Section 2.3.1 Urban Growth Areas, The Central Kitsap UGA is not currently recognized for future annexation by a city, but is associated to Bremerton in Alternative 2, "Compact Growth/Urban Center Focus". The City appreciates County association in this alternative, and requests association be included in the EIS preferred alternative. The only other two UGAs listed as currently not recognized for annexation are the Kingston and Silverdale UGAs, which the December 2023 DEIS notes are anticipated to incorporate and become their own cities at some point in the future. The City of Bremerton requests that Kitsap County associate the CK-UGA to the City of Bremerton with the current 2044 Comprehensive Plan update and make this part of the preferred alternative. In this current comment letter, the City lists each document previously supplied to Kitsap County related to the current Comprehensive Plan update, and summarizes requests made in those documents; please see those original letters for any further needed specificity.</p> <p>The City would also like the Board of Commissioners to consider the following additional information not addressed in previous comments related to the CKUGA.</p>	Thank you for your comment. Your request for association of the CK-UGA to be included in the preferred alternative will be forwarded to County decision makers.	Letter	2.3.1
291	City of Bremerton	<ul style="list-style-type: none"> Existing Wastewater Service. The City of Bremerton currently provides urban services to the CK-UGA. As seen in the above image, wastewater service is supplied to well over 150 properties within the CK-UGA. The December 2023 Draft Environmental Impact Statement, Section 3.3.7.1.3 Wastewater/Sewer should be updated to note that Bremerton currently provides wastewater service to portions of the CK-UGA. As the City currently provides wastewater service to the CK-UGA, and for other reasons documented in this comment letter, the County should associate the UGA to the City with this Comprehensive Plan update. 	The Final EIS will include this information on wastewater services to the Central Kitsap UGA.	Letter	3.3.7.1.3
292	City of Bremerton	<ul style="list-style-type: none"> Existing Annexation Agreements. As the City of Bremerton has provided water and wastewater utility connections throughout the CK-UGA, property owners have signed agreements (more commonly known as Outside Utility Agreements) not to protest any future annexation efforts by the City of Bremerton. Those agreements are recorded on property titles with the Kitsap County Auditor. Parcels illustrated in black in the above image, represent properties with recorded agreements; there are now more than 800 properties subject to these agreements within the CK-UGA. These properties nearly reach as far north as Waaga Way, the farthest recorded example located on Watson Place NE. 	Noted.	Letter	2.3.1
293	City of Bremerton	West Bremerton Urban Growth Area (WB-UGA). Bremerton notes that City requests for expansion of the WB-UGA have been granted in their entirety in both Alternative 2 "Compact Growth/Urban Center Focus" and also in Alternative 3 "Dispersed Growth Focus"; as seen in part within the adjacent illustration excerpt from Map of Proposed Zoning Changes by Alternative published by Kitsap County. Our sincere thanks to the County for placing proposed UGA alterations within both proposed alternatives. Granting this limited UGA expansion will resolve outstanding urban service discrepancies for parcels currently outside the UGA, better address ongoing water-quality concerns with Kitsap Lake, and would place City owned properties into the WB-UGA for municipal purposes. Please include this limited UGA expansion in the preferred alternative. Please contact the City if any further support is needed to ensure the proposed UGA expansion is adopted.	Thank you for your feedback on the UGA changes. They will be forwarded to County decision makers.	Letter	2.4
294	City of Bremerton	<p>3. City Reclassification Support. The City supports the following reclassification requests:</p> <ul style="list-style-type: none"> Reclassification Request #41. Some iteration of this request exists in both Alternative 2 "Compact Growth/Urban Center Focus" and also in Alternative 3 "Dispersed Growth Focus" though geographies between the two are substantially different. The City supports industrial uses in this area, we encourage Kitsap County to continue to work with the property owner on appropriate geographies and include that in the preferred alternative. Reclassification Request #75. Mayor Greg Wheeler submitted a 4/13/2023 letter of support for this reclassification request, noting the benefits to the Regionally serving Puget Sound Industrial Center (PSIC). Currently, this request is found only in Alternative 3 "Dispersed Growth Focus". The City requests that this request be included in the future preferred alternative. 	Thank you for your feedback on the reclassification requests. Your comments will be forwarded to County decision makers.	Letter	2.5.2

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
295	David Pedersen	My name is David Pedersen and I would like to comment on the Comp. Plan and DEIS document. During a meeting at the Village Green, as I understand it, Jon Rose stated, in general most resources are located around urban areas to prevent sprawl, yet he is asking DCD to accept his request for application ID#72 to be granted, which in fact, per the Kitsap United North Feasibility study will create urban sprawl in an area that is currently zoned Rural Wooded (RW) to Rural Residential (RR). The DEIS, the GMA, and the Puget Sound Regional Council rejects urban sprawl in rural environments and how this type of activity incorporates too much mitigation. In my opinion to keep our natural resources safe, as these mitigated measures fail from time to time, I would submit that DCD adopt a resolution to allow Commissioners to review any rezoning request over 20 acres that involve the county's aquifer recharge areas, timber lands, and lands containing minerals to preserve what's left of our natural resources. This will also keep taxes lower for the community. In regards to the Preliminary Transportation Assessment in the NKU's Feasibility Study, page 11, there have been 2 deaths in our area from accidents that have occurred less than 6 months ago. One on Bond Hwy 307 and one in front of Heritage Park Hwy104. I have submitted a more recent accident report to the Commissioners from North Kitsap Fire and Rescue, indicating 415 accidents up to October 15th.	Thank you for your comments and information. Your feedback on the rural rezoning will be forwarded to County decision makers.	Email	2.5.2
296	David Pedersen	This particular article written by former Kitsap County Commissioner Steven Bauer, was published September 4th, 2009 and submitted to the Kitsap Daily News for circulation throughout Kitsap County. I have lived here for well over 30 years and seen the changes the county has gone through and find this article is extremely accurate in its facts and findings as my neighborhood was flooded at its lower end because of a retaining pond overflow across the street during a rain storm, which then flowed into the adjacent ditch which had a very large culvert that lead directly underneath HY104 to our storm water ditches and created a massive influx of water, our 2.5 foot by 3 feet wide ditches could not handle. Water overflowed on to Bond road and headed due north to the lower established homes across the street and through our culverts which could not handle the flow as well! So I ended up having to do a lot of photographic work to show the DOE after arriving. Just one of our culverts could fill a fire truck in less than 5 minutes! The water finally slowed after several homes had water up to their front porches above steps. It is my understanding the business that refused to follow their own approved blueprint in its inception clearly stated the ground was to be left with at least 60% gravel to assist in our Category 1 aquifer recharge area. Instead it was completely paved over with blacktop and a piping system leading directly to the retaining pond. The DOE was very upset about this issue and I still to this day have no idea if DCD Code Enforcement was ever involved with repair work. I am under the impression that culvert under HY104 may now be plugged, which allows thousands of gallons of water to flow straight down the hill to Gamble Bay under same conditions. Mitigation is nothing more than a means to slow down the destruction of a particular resource, and as I have said before, KPUD will "simply" walk away if any of these actions occur! I hope to live another 30 years, and pray those who make decisions for our next generation are long term and solid. On page 48 of the Puget Sound Regional Council vision 2050, "the amount of impervious surface as a key metric related to the health of the region's water resources. Increasing the amount of impervious surface may have numerous impacts... degraded water quality, decreased aquifer recharge, and increased water temperature." "King and Kitsap Counties have the highest percentage of impervious surfaces at 9.4% and 9.1%." Kitsap County has reached the mark of its resiliency in my and many others belief that leads to that same thread where I have now endured the smell of chlorine in my drinking water for over four years, but have not been medically affected to the best of my knowledge at this time. My community has expressed their concerns as well on our web page. Health advisory issued for Dyes Inlet due to sewage spill. For information, go to: https://lnks.gd/2/nNdx7	Noted. Thank you for the comment. Your feedback will be forwarded to County decision makers.	Email	3.3.8
297	David Vliet	Of the alternatives proposed by DCD, Alternative 2 is the one I support. It provides for more rural, farm and environmental protections.	Thank you for your comment. Your feedback on the alternatives will be forwarded to County decision makers.	Email	2.4
298	David Vliet	To refrain from being repetitious, I would like to call special attention to the comments from Poulsbo Mayor Erickson and the Port Gamble S'Klallam Tribe. I do not support the Raydient rezoning request. It would degrade forever the rural character that currently exists and would bring suburban/urban traffic and other environmental mitigation needs that are not supported by the intention of the GMA. Please keep the zoning as it stands. If future citizens decide to change this, let them do so at that time. The same goes for the Island Lake rezoning request. Please deny this rezoning.	Thank you for your comment. Your feedback on the rural rezoning will be forwarded to County decision makers.	Email	2.4.3
299	David Vliet	Between 1997 and 2017, Kitsap County lost 61% of its farmland (USDA Agricultural Census, 1997-2017), nearly three times the rate of that in the greater Puget Sound Region. Kitsap County needs to make farmland preservation a priority to provide food security for its citizens. We cannot, and should not, expect farmers in other areas to fully supplement our growing food needs. There is a growing number of young and motivated local farmers that we need to embrace and assist in growing our local food supply. Please commit to public hearings with regards to farmland preservation in 2024-25.	Noted. The draft comprehensive plan contains numerous policies and strategies to protect farmland.	Email	2.4
300	David Vliet	I agree with previous citizens commenters below on the need to achieve Net Ecological Gain when pursuing development goals as a county. We cannot continue to unsustainably build out and lessen our quality of life, in a "death by a thousand cuts," as someone said below. And no more variances when it comes to wetland mitigation. This is a shell game that does not force us to come to terms with building the way we should, where we should. I have heard that our development community is very creative. Let that creativity flow within the existing landscape and work around our critical and forested areas. These are critical areas for a reason. I support expansion and enforcement of the CAO. I however would like to see some exception in the CAO code for farmland. I'm proposing something like a 50% variance of setback in the CAO so these farms can remain in business in a county with rising land values and rapid land conversion.	The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Email	3.1.3.1
301	David Vliet	Lastly, Kingston, "The Little City by the Sea," is a gem of a town. I strongly oppose the upzones put forth in the alternatives for Kingston. Especially for the poor folks off Lindvog Rd., a beautiful road that will be forever changed should this zoning be changed. We need to wait to see the impacts that Arborwood has on our quiet and kind little town before expanding the UGA. From what I have read, Kingston has already met our population goals as required by the GMA.	Thank you for your feedback. Your comments on the zoning changes in Kingston will be forwarded to County decision makers.	Email	2.4.2, 2.4.3

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
302	Jackie Kelly	The EIS comprised of over 250 pages is indeed a detailed analysis of the environment comparing impacts of the three alternative choices, coming to conclusions without making suggestions. It is interesting to me that Alternative 1 was used at all since there was never any chance that the County would or could select to remain the same considering the new growth needs over the next 20 years. It just added confusion in my opinion. Alternative 2 clearly brings about the best outcome according to the EIS towards meeting the County's vision as stated: Kitsap Countywide Planning Policies Vision Statement "Objectives: We work on strategies to achieve the following objectives: a. Livable urban communities that are centers for employment, civic activities, and homes: • Attractive, livable urban neighborhoods that are bike/pedestrian-friendly and offer a range of services, housing, and transportation options. • Cities that are centers for employment, affordable housing, and cultural activities. b. A vital and diversified economy that provides career pathways and living wage jobs for residents, supported by adequate buildable lands for a range of employment uses. c. An efficient multi-modal transportation system: Accessible roads and highways, transit, ferries, airports, and non-motorized travel – supporting our land use pattern while providing mobility for residents. d. Natural systems protection: Respect the natural environment, including natural resource lands such as forests, wetlands, wildlife habitat, streams, and the Puget Sound – as well as the quality of our waters, land, and air. In addition, maintain a system of open space, trails, parks, and greenbelts providing opportunities to spend time outdoors and to learn about the environment. e. Rural Character: Maintain the traditional appearance, economic, and ecological functions of Kitsap's rural communities, to include the production and distribution of locally grown food." (bold italics are mine	Thank you for your feedback. Your comments on the alternatives will be forwarded to County decision makers.	Letter	2.4
303	Jackie Kelly	However, 1.2.3 Level of Analysis in the EIS page 1-3 states: "Site specific analyses are not required". That means no one has actually walked the properties requesting rezoning to actually see what critical areas may be impacted by a zoning change. How can this detailed and expensive of an EIS not include actual land observations? How could it possibly be accurate or complete as is? Is it the Counties policy to turn a truly blind eye to actual potential damage to the environment in favor of development? How could this possibly meet the Counties vision statement unless that too, are empty words.	The EIS for the comprehensive plan is a non-project EIS. That means it studies potential impacts from land use change and countywide growth and development over the planning period. Site-specific walkthroughs and environmental analysis are beyond the scope of this endeavor. That more detailed level of analysis would be required for specific projects or land use actions proposed on a particular site under the County's SEPA and critical areas code as well as all other relevant sections of County code.	Letter	1.2.3
304	Jackie Kelly	While much of my concerns pertain to the entire county, I am focused specifically on the rezoning of parcels 102501-1-016-2004, 102501-4-001-2005, and 102501-4-002-2004 plus parcel 102501-2-004-2006, 102501-2-002-2008, and 102501-2-001-200. The last three were already rezoned Urban Low density without a site based Environmental Impact Study completed. This is so unfortunate that no environmental impact study has been required because this 55 acre area has a critical aquifer, critical erosion areas along with the lake shoreline and creek wetlands. I am lumping them together because if rezoned, the same people will be developing the entire acreage. Also of note the NOA of September 2023 lists parcel 102501-1-0016-2004 as already zoned Urban Low Density which, after bring it to the Permit managers attention, he changed it. But the public records I am receiving still have that large parcel as listed incorrectly giving anyone who reads it the idea that the rezoning is a finalized deal. It is misleading unless there is an unofficial agreement or perhaps even an unofficial commitment to follow through with a rezoning between the county and the developers. Also of concern regarding these parcels is that the County has told us numerous times that the alternatives are not set in stone but will be customized to meet the needs of each area in particular. This is also misleading to the public when asking us to select one alternative and then the county saying, we are going to pick and choose what we think is best. Who makes these administrative decisions? All of the above parcels have Island Lake, Barker Creek and Central valley in common. All of them have numerous critical areas identified that are currently in the process of updating possibly with larger buffers than currently required. It is shortsighted to think of rezoning any parcel with critical areas identified on it before the critical reports are concluded and an environmental study has been completed not just a SEPA checklist!. It should be required for any developer before development to have a full environmental review done before any ground is moved. Who makes these administrative decisions to reduce the lake shore buffer and the stream buffers? Does this policy follow the stated vision of Kitsap County??? There should not be any buffer reductions in critical areas period. The only reason to do this is to allow developers to make as much money as possible and the county to get as much money as possible. It shouldn't be money first, environment second. That narrow minded driven policy is killing our planet and will certainly wipe out the natural beauty of our area. Environment and economy need to be working together in order to have the most positive outcome for the long run.	Thank you for your comments. Rezones do not necessarily require an EIS if consistent with a comprehensive plan update or previous planning action for which sufficient environmental study has been conducted. Your comments on selection of an alternative are noted and will be forwarded to County decision makers. The Board of County Commissioners has the ability and authority to create a preferred alternative that blends aspects of the alternatives studied in the EIS, or they may simply choose an alternative as the preferred alternative.	Letter	Multiple
305	Jackie Kelly	I have heard from the developer as well as one of our Commissioners that "Island Lake just wants to be a wetland". We who live here are not of that opinion in the slightest. Talking to one of the water districts representatives I have learned that there is a lot of colluding between the County and the developers. When I hear the same silly statement out of both parties mouth, developer and County, it reaffirms what I was told unofficially about collusion. Just to be clear...Island Lake is a 40 acre lake over 20 feet deep sitting over the largest critical 1 Aquifer in the Silverdale area. It has been a vibrant lake that was full and overflowing into Barker Creek all the way through Central Valley to Dyes inlet before all the development started. It wasn't until all the big development went in around the hillsides of the Lake in the late 1980's to early 1990's that the lake level dropped so drastically that Silverdale Water District by 1992 had to pump in water to maintain the lake level. The water use of the surrounding new developments draws from the aquifer which in turn lowers the level of the aquifer and thus the lake level drops to replenish what was pumped and that is why the lake needed to be subsidized with more water. It is a vicious cycle. The Silverdale Water Districts wants to say it is evaporation that causes the lake level to lower but how can that be when before all the development around the lake, it was just fine? Saying that Island Lake 'just wants to be a wetland' is just a ruse to say development has nothing to do with the lowering of the water level. Only people that favor development over the environment would say something like that. We have residents here who have lived around the lake over 60 years. Surely they know what the lake was like before the dense development around the hillsides of the lake began and long before any need to pump water into the lake to maintain the level ever happened.	Your comments on Island Lake are noted. We will examine language in the EIS related to Island Lake and clarify as appropriate.	Letter	3.1.3

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
306	Jackie Kelly	I want to address Barker Creek and it's struggle to reach Dyes Inlet as it once did. Kitsap Conservatory fish mapping site clearly has Barker Creek marked as fish barring all the way to Island Lake. This was the case before Crista Camp put in a poorly designed and maintained culvert from the lake outflow through 450 feet or so of their property to have more of a level playing field. The new owner of this property even though he has doubled his original cost of \$6 million to purchase the camp by selling 55 acres three months later for \$12 million say that they can't afford to day light the clogged portion of the creek unless they get the property rezoned so they can develop it. They have also insinuated they would have commercial as well as residential housing that could include a mini mart gas station. They have clearly expressed this plan to the County as well as to the public upon occasion. I say...they have already doubled their money and any good steward of the land would day light that creek because it is the right thing to do and not hold it over the head of the county to grant them a rezone. Barker Creek has been cared for by the residents living near the creek for years. Aided by The Salmon Recovery Funding Board in 12/21/2006 with \$723,964.20 and citizens donating their property on the Creek to be held as a salmon stream, the County promised Central Valley and Barker Creek would never be developed. How do we honor this commitment and work and funds already put into Barker Creek? We know the Tribes have voiced opposition to development of this property. How do we honor the rural farms and those on well systems when thinking about development of the Central Valley corridor? How could anyone with foresight even consider rezoning and developing this critical and unique area without a complete full Environmental study done on site by a professional third party unbiased company?	Thank you for your comments on Barker Creek and the proposed rezone. Your feedback will be forwarded to County decision makers.	Letter	Multiple
307	Jackie Kelly	The EIS includes Appendix C Transportation Project List by Alternative. No where on the project list is any improvement to Camp Court or Island Lake Rd. It is inconceivable that the County could consider a 340+ development in this area with no intentions to add sidewalks for the school children that stand out in the dark on the road waiting for the school bus or added stop signs or a round-a-bout or any protection for pedestrians, dog walkers and bicyclists.	Thank you for your comment. The project list in Appendix C includes roadway projects needed to meet transportation LOS/concurrency standards. This project list will be representative of all transportation improvements within the next 20 years. Additional development mitigation will be assessed during the development review process.	Letter	Appendix C
308	Jackie Kelly	According to SEPA Manager Scott Diener, almost all permits in Kitsap County are granted a DNS. That seems to be the standard policy of our county government. Why is that? Who does that favor? I am including his email with this submittal.	The SEPA official reviews all environmental checklists that are submitted. Proposals are reviewed for all new adverse impacts that are above and beyond what has been studied in a non-project EIS. All SEPA decisions have a comment period and opportunity to challenge decisions.	Letter	Multiple
309	Joseph Lubischer	§3.3.4. Forestry plans and master plans for County heritage parks exist. They may or may not have been approved by the BOC and may or may not have gone through a SEPA process. It is fair to say that the County and Parks Department processes for reviewing, adjusting, and implementing these plans is unclear. These plans are within the purview of the GMA. None of these 'land use policy plans' are mentioned in the current EIS and it is unlikely they have been addressed previously. The current EIS should (1) acknowledge, explain, and address these plans and (2) identify adverse environmental impacts.	The Parks department has several Parks Stewardship and Management Plans that have been adopted by the Board; Newberry Hill Heritage Park, North Kitsap Heratige Park, Port Gamble Heritage Park, Coulter Creek Heritage Park, and other Park Plans for local communities. These plans are considered under the umbrella of the Parks, Recreation, and Open Space Plan which undergoes its own SEPA review, and is also considered in the Comp Plan EIS.	Email	3.3.4
310	Joseph Lubischer	§3.2.6.1 specifically addresses the Sound to Olympics STO Trail. This project previously received DNS status under the String of Pearls and Non-Motorized plans. The SEPA determinations were based on route alignments that have been largely abandoned. On the order of 90% of alignments, outside of SR305, have been changed. In addition, County failed to identify adverse impacts that offer little possibility for mitigation. Therefore, the previous Determinations are invalid and a new SEPA process is required. A specific Determination of Significance for this project is required. In addition, because this project is linear, phasing is not appropriate.	Thank you for your comment. If the nature of the STO project has changed substantially, it will have to undergo additional environmental review consistent with permit process requirements under Kitsap County Code.	Email	3.2.6.1
311	Joseph Lubischer	3.3.4.2. The master plan for Port Gamble Forest Heritage Park, aka Framework, received a Determination of Non-Significance. When challenged, the County said 'ok', we'll include it under the Comp Plan EIS. Under SEPA, the process requires, equentitally, a determination of significance, then EIS if applicable, and if not applicable then non-project and project determinations. A fair question is what is the County's process with this land use policy? The process must be clarified and an environmental review be performed following SEPA rules.	Port Gamble Framework is a reference document, not being adopted by reference or ordinance, and not a subarea plan. All future decisions related to this will have to go through environmental review as appropriate.	Email	3.3.4.2
312	Kitsap Alliance of Property Owners	Prior to this discussion found on page 2-29, there is no reference made to the Goals and Objectives of the County's Comprehensive Plan and how they would or might be implemented by the proposed Comprehensive Plan Update. There is reference to the County-wide Planning Policies and how the plan's implementation would provide compliance. The problem with this analysis is the Citizens of Kitsap County have no say in the construct of those policies and cannot critique them individually or collectively. Add to that the problem of a lack of "showing" that the County-Wide Planning Policies, while adopted by the four Cities and Kitsap County in the Kitsap Regional Coordinating Council (KRCC), are in fact compliant with the provisions of the Growth Management Act (GMA). The reason for the County-Wide Planning Policies, which have their origin in the Puget Sound Regional Council's (PSRC) 2050 Transportation and Land Use Plans is to secure federal funding for transportation projects that is funneled through that organization. KRCC's adoption of the County-Wide Planning Policies is really a substitute action because Kitsap County and its four-municipalities have not established policies derived by and for Kitsap County and its cities. There is this statement found on page 2-29 "Conversely, a disadvantage of delaying the proposal is GMA noncompliance status. To be eligible for grants and loans from certain state infrastructure programs, a local jurisdiction must be up to date with the requirements of the GMA, including the periodic update requirements." At best this statement is inadequate and more important it portrays an expedient plan update process that over emphasizes grant and loan funding without demonstrating what is best for Kitsap County and its citizens. Just as significant our representative republic was set up to provide "government of the people, by the people and for the people" and not government just to qualify for grants and loans. Any comprehensive plan update process as mandated by GMA requires only a review of the existing plan (last updated in 2016) in regard to amendments to GMA since, in this case, 2016, changes in technology, population forecasts land use-based market forecasts or economic conditions including trends in commercial and industrial development. Such an update may also consider findings from a "deficiencies analysis" of prior plan provisions, goal achievement or policy implementation. Regarding this quoted statement as found on page 2-29, unless there is a showing of how this complies with "government of the people, by the people and for the people," what has changed since 2016 in current conditions as well as recent updates to GMA, how the plan proposals actually implement Kitsap County's Planning Goals (those in the 2016 Comprehensive Plan) and what would happen if grants and loans were delayed, i.e., the real or theoretical monetary impact to Kitsap County's budget, there is no reason to proceed at this time (i.e., with the pending public hearing process to consider plan proposals). Thus, KAPO advocates for a delay in the plan adoption process.	Thank you for your comment. Your feedback will be forwarded to County decision makers. Goals and policies of the comprehensive plan are being revised in the proposed comprehensive plan periodic update. The periodic update process is the time for a jurisdiction, in this case Kitsap County, and its residents to express goals and vision for the future and how best to accommodate growth and change. The development and adoption of the Countywide Planning Policies must comply with GMA requirements, including being consistent with regional planning goals and policies (multicounty planning policies, RCW 36.70A.210(7)). This would be PSRC's VISION 2050. Being ineligible for grant funding is in fact a recognizable disadvantage of delaying the proposal. A gap analysis was conducted on the comprehensive plan relative to changes to the GMA, to PSRC's multicounty planning policies, and the updated Countywide Planning Policies.	Letter	2.6

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
313	Kitsap Alliance of Property Owners	Pertinent to the discussion addressing the need or not for a delay in the plan adoption process, there is no analysis in the DEIS to detail why the No Action Alternative will not be effective to implement the most recent update change in requirements of the GMA or the development trends now observable in Kitsap County. But there is a reason why the pursuit of the "no action alternative" is not desirable. The answer portrays three deficiencies in the DEIS analysis. The first is lack of documentation as to what legislative changes in GMA that have been adopted since 2016 that cannot be implemented with the current provisions of Kitsap County's 2016 adopted plan and ordinances.	The gap analysis completed for the comprehensive plan periodic update contains the analysis of what is required to change in the comprehensive plan. Additionally, the EIS demonstrates that the No Action Alternative (Alternative 1) does not accommodate the projected population and employment growth.	Letter	2.4.1
314	Kitsap Alliance of Property Owners	The second and just as important is the lack of documentation in the DEIS to address the consequences of implementing provisions of the 2017 Critical Areas Ordinance update (now in process). One such possible provision that appears likely to be adopted is the replacement of critical area buffers with "riparian habitat zones." The significance of this proposition, which would be imposed adjacent to all ditches, streams and creeks will take away significant portions of the "urban or urban growth area" allocations. The net effect of the implementation of that ordinance provision would cause the reduction in the amount of property that could be used to accommodate the influx of new people coming into the County. The DEIS for the comprehensive plan does not address this issue in quantifiable terms. This oversight has another consequence in that the 2021 Buildable Lands Analysis document is subsequently deficient as there is no analysis in that report to document what the effect of a diminished supply of urban/ urban growth area would have to conclude whether or not such areas could accommodate of the project population numbers allocated to those urban or urban growth areas.	The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter	2.4.1
315	Kitsap Alliance of Property Owners	A third oversight in the DEIS analysis pertains to the lack of documentation of the price impacts on limited land supply, particularly in the urban and urban growth areas. Failure to properly account for sufficient available land supply within an urban or urban growth area will have a predictable and evitable consequence of increasing the price of land. With escalating land prices one result is in the effect on the cost of a new home and even the rent charged in apartment buildings - an ever-increasing cost of a new home or apartment complex. This consequence, also portrays the faulty assumptions about land supply contained within the 2021 Buildable Lands Analysis report. Believe it or not, whether Kitsap County wants to admit it or not, the economic based law of supply and demand still predicts results when the supply of land is limited, in this case artificially limited. Therefore the "No Action Alternative" is not tenable.	The Land Capacity Analysis that forms the basis for the documented capacity of the Alternatives adopts a land supply market factor, or market factor, as allowed and recommended by State guidance on the land capacity analysis and land use element. This accounts for the multitude of reasons why many parcels with theoretical capacity may not develop at zoned capacity (or at all) within the planning period.	Letter	2.4.1
316	Kitsap Alliance of Property Owners	For all the reasons set forth in the discussion of why the "no action alternative" is not tenable, the same are true for the "compact growth/ urban center focus alternative." Those observed and discussed, there are other issues associated with "compact growth" having an "urban center focus." The two primary ones are replacing existing development in "centers" with new multi-story buildings and densifying existing single-family neighborhood developments. There are fatal flaws associated with both possibilities. The fatal flaws are summarized herein, even in recognition that some investors/developers may pursue compact growth projects within the specified centers: 1. Building up in confined space or small lot allocations inevitably comes with a higher cost and thus forces any housing provided to have a higher per square foot price than single-family detached or low-rise apartment complexes. Those higher costs are for utilities in water, sewer, power, gas or stormwater facility extensions and/or upgrades to existing facilities as well as the structural infrastructure of buildings. 2. Cost of compliance with energy code, emission standards, or unwanted/needed "climate change & resiliency" standards is much higher in compact developments than for single-family detached or low-rise multiple family projects. One example, is the compliance with 1970 Clean Air Act. Kitsap County's air quality standards are now good to excellent per the Clean Air Act. However, the concentration of vehicles associated with "compact development" will have an adverse impact on Kitsap County's air quality because of the vehicle emissions. The problem is not just with vehicles circulating within or around such development patterns it is also with the congestion exacerbated on SR-3, SR-16, SR-166, SR-160, SR-303, SR-104, Silverdale Way, Wheaton Way, and all major arterials in Kitsap County. Relative to the proposition that transit will replace and therefore reduce the dependence on single-driver cars and trucks, that has yet to be proven. Also, not a tenable proposition is that electric powered vehicles will replace the combustion engine powered cars. Way too many problems with that latter postulation, some of which will be addressed in the discussion regarding compliance with GMA Goal Number 14 -Climate Change and Resiliency. 3. Existing residents in single-family developments are generally opposed to apartment buildings being constructed on neighbor's lots. Predictably, these neighbors will find ways to appeal building permit approvals for projects changing the character of their neighborhoods. 4. Higher development costs will price housing beyond the median income household's ability to afford housing. There is evidence to show that such a condition already exists in Kitsap County. Two consequences are imminent and possibly a third. First since higher housing costs preclude new home (and equivalent exiting housing) purchases, there will be a rise in the homeless population. Alternatively, families will relocate to other areas having a lessor land prices as well as overall home costs, such as found in Mason County. If employment opportunities still exist in Kitsap County connecting h ghways will be jammed with traffic as is now the case between Belfair and Bremerton along SR-3 and SR-16. The third consequence may adversely impact the County's largest employer, the US Navy and their long-term plans to maintain facilities in Kitsap County to repair and refurbish Naval vessels. Lack of housing affordable to their personnel and families could affect decisions as to where vessel repair takes place in the United States. 5. Lack of timely upgrades to the road system, particularly in the SR 3 to Garst and to SR-16. Clearly, an existing traffic jam exists where SR-3 in ersects with Sinclair Inlet and traffic exiting the Puget Sound Naval Shipyard/Bremerton at the afternoon/evening peak-hour. For well over 20-years this intersection has been a "problem child." Apparently, the discussions continue for how to solve the congestion problem, yet until there is a concrete plan and an implementation project this will remain a congested corridor. This one area will affect the ability of "compact development" in the two primary "centers," Silverdale and Bremerton to remain viable places for development or redevelopment. Just what solution in an unspecified time-frame will work remains to be seen. Consider too, that the Port of Bremerton's allowance for a race track to be located in the vicinity of the Bremerton International Airport will bring new traffic patterns into this already congested area. Traffic solutions and continued delays in the start of construction projects to solve this problem will have a "chilling effect" on center's development, therefore limiting the ability of Kitsap County to fully implement "compact growth" within identified "centers" in the County over the projected life of the plan. Incidentally, no Capital Improvement Plan has been referenced in the DEIS to show when a project will and funded to solve this one problem.	Thank you for your comments. Your feedback on the alternatives will be forwarded to County decision makers.	Letter	2.4.2

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317	Kitsap Alliance of Property Owners	While statistical data is presented to document income levels of people residing and working in Kitsap County, the data is presented without context. For example, on page 3- 64 there is a chart showing the Average Market and Fair Market Rents for two- bedroom apartments. The 2022 average for such units in Kitsap County is \$1,865.00. However, when U.S. Housing and Urban Development housing allotment standards are considered of 30% of gross income the recorded number is \$530.00 per month. Even that median income family with a household income of \$1767.00 per month, that family cannot afford the going rent of a two-bedroom apartment pretty much any where in Kitsap County even if all of their income goes to pay rent. Consider the family of 2-4 with Kitsap County's Median Income level of \$ 8,000.00. That household can barely afford a 2-bedroom apartment with 30% of their income going to rent plus utilities @ \$1,950.00 per month. But, if their income is close to the median income for Kitsap County, then such household is better off than those making less or substantially less than the median Income. When the price of a new home and comparable prices of a like product in the existing housing inventory is, as it is reported to be, close to \$600,000.00 in 2022-2023. The financing costs, i.e., the mortgage rates to be paid for conventional financing @ 6.89% requires a payment of approximately \$3,140 per month and that assumes a down payment of \$120,000.00. Veterans Administration (VA) loans, for those who qualify, could finance the entire \$600,000 at \$3,925 per month. In the latter case there would have to be a household income of at least \$157,000 per year and desirably higher. The obvious conclusion is that unless a family has an existing home to sell (at a profit, which can be applied to a down payment), a contributing family member (wealthy of course) or there is an unexpected inheritance to apply to a down payment, the cost of a new home as well as rent is beyond the means of a substantial number of Kitsap County potential home owners. Discussion analysis such as this should have been a part of the DEIS as it is a requirement of GMA for any plan or plan alternative Kitsap County proposes to adopt. Using the data already compiled in the DEIS there provides sufficient basis to draw conclusions regarding the three primary alternative plan provisions about housing affordable to all income levels. The analysis proscribed in the GMA. Unfortunately, the DEIS makes no such assessment, this omission does, in fact, underpin the conclusion that the DEIS lacks a sound foundation to provide support for what constitutes "housing affordable to all income levels." A further omission is the lack of any discussion of Navy/ Military housing allowances for different grades of enlistment such as an E-3 cadet and his or her family. Military families coming into the County with aircraft carriers, submarines or battleships needing refurbishment, which can take 2-3 -years to complete, are a significant part of Kitsap County's population/ community and thus should be included in a housing affordability analysis.	The analysis of capacity versus allocation by income bracket is being performed concurrent with revisions to the draft comprehensive plan periodic update. Additional information about the alternatives' performance relative to housing capacity by income bracket will be included in the Final EIS.	Letter	3.2.3
318	Kitsap Alliance of Property Owners	1.The GMA does not define the word environment. When a law lacks a definition of a key feature, the usual default is to the dictionary definition. The Oxford English Language Dictionary defines the word as follows: 1. the surroundings or conditions in which a person, animal, or plant lives or operates. Examples being habitat, territory, domain, home, abode or surroundings. 2. the natural world, as a whole or in a particular geographical area, especially as affected by human activity. With that understanding as a backdrop in the context of GMA, there is no clear path to discern how or why one finds Goal No. 10 calling jurisdictions to "protect the environment." Defaulting back to the dictionary definition, "what surroundings or conditions in which a person, animal or plant lives or operates" is to be Protected? Also, left unstated is the question of how. Mentioned specifically in Goal No. 10 is air and water quality and the availability of water. Protection usually means a set defense against an outside force to prevent destruction or annihilation of, in this case an environment. Other than air and water quality (to include the availability of water) what natural or manmade environment is to be protected? Is it the land resource? Is it tree stands? Is it wet areas? Is it a dry creek bed? Is it topographic relief with slopes calculated in excess of 15%? Is it habitat for endangered species of wildlife? Is it prime farmland? Is it developed areas with streets, utilities, housing and commercial/industrial development? Is it a heavily traveled road corridor? Is it vistas of Puget Sound, lakes and mountains? Or is it understory vegetation with nettles and blackberry vines? In short, the word environment can include a wide variety of natural features or human settlement patterns/ conditions (as implied in the definition) both urban and rural in nature. But if there is going to be a comprehensive plan to address "environment(s)" there needs to be a specific reference to which or what kind of environment is a feature of the plan's provisions not to forget an assessment of impacts of at least the three plan alternatives. Assuming "environment" has a broader reference beyond just air and water, how is the term "protection" defined of the generalized term environment? Does "protection" translate into "no change" to existing environment conditions? If no other consideration is given in the construct of a "no change" to existing conditions proposition, the law of entropy will come into play and that which exists will deteriorate, with or without man's interference. Does "protection" apply then to only some aspects of a natural or manmade environment? Back to the question of "how" protection is defined, some have argued in the past that the "how" is defined as "no net loss of functions and values." The problem with that proposition is (when it was promoted) there was no baseline study antecedent to determine what functions and values prior existed. And there was no clear definition of "functions" or "values." Also, not a consideration was how or whether particular development proposal would affect those so-called "values and functions" supposedly in a deleterious manner. A further defect was or is, if this is somehow still a measurement, concerns the lack of specificity as to whether the assessment was to measure so-called natural conditions or the state of existing development patterns to include manmade structures. The questions posed addressing the lack of foundation for an "environmental" analysis cannot be passed by as trivial. There is a body politic proffering the suggestion / assumption that "best available science" can be used in an environment analysis. It is politics and not science because unless the studies quoted or referenced can be replicated in Kitsap County's jurisdictional area by scientists with the same qualifications as those who conducted the original analytic studies in other locations outside of Kitsap County or the State of Washington, by definition IT IS NOT QUANTIFIABLE SCIENCE and may or may not have application to conditions in Kitsap County. A further point of emphasis, relying only on assumptions as opposed to leasurable data or lack thereof, any change to Silverdale or Bremerton (not to overlook the other "centers") to build up or even build at all, would be an environment change to existing conditions and therefore posing a requirement need for "protection." The issue needing address in the DEIS is an evaluation of the three plan alternatives compliance with Goal No. 10 relative to impacts on air, water and water availability. If other features of Kitsap County's natural and manmade conditions are to be included in such analysis, they need to be specified as to which will be assessed and why.	What is to be protected as part of the Growth Management Act is defined as "critical areas" as well as agricultural, forest, and mineral resource lands designated in comprehensive plans. RCW 36.70.030(11) defines critical areas. State administrative code and best available science from state agencies and others provides detail on precisely how to delineate and protect these resources. The EIS studies impacts to environmental resources as defined in the State Environmental Policy Act and subsequent administrative rules.	Letter	3.1

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319	Kitsap Alliance of Property Owners	<p>LACK OF ANALYSIS OF THE 15-GOALS OF THE GROWTH MANAGEMENT ACT AS TO HOW THE PROPOSED COMPREHNSIVE PLAN UPDATE WOULD IMPLEMENT GOALS BY ANY ONE OF THE THREE ALTERNATIVES</p> <p>The DEIS in Section 3.2.2.1 entitled Relationship to Plans and Policies – Affected Environment lists the 15-Goals found in GMA Chapter 36.70A.020. What is missing from the discussion/ analysis of these goals is "how" or "whether" any of the three alternatives would implement each and every one of these goals. Thus, no judgement can be formed as to which alternative better implements all the goals. Note too, that besides Goals No. 4 and 10, there are other goals with associated problems. According to the Department of Community Development staff, none of the 15-Goals are weighted any more for plan compliance than another. Aside from the fact that is patently not a valid conclusion, the evidence in both the Comprehensive Plan Update and the Critical Areas Ordinance Update, proves otherwise. Consider the "riparian habitat zone" substitute for buffers along ditches/ creeks as earlier referenced in the discussion of Untenable Pursuit of Status Quo/ No Action alternative. The implications of just this one regulatory measure (if included in the CAO Update), trumps all other goals. In other words, Goal No. 10 - Environment and its protection becomes the defacto number one or number two Goal priority even with its lack of specificity. The lack of examination of each of the 15-Goals, with respect to the three plan alternatives is significant oversight in the DEIS, this is especially the case since within the last 8-years two-new Goals were added to the Act - No. 14 Climate Change and Resiliency and No. 15 Shorelines of the State (Ref. RCW 90.58.020). Neither of these goals have been a consideration in past Comprehensive Plan Updates. So, there is no fallback analysis to reference in past Environmental Impact Statements preceding the adoption of those prior Comprehensive Plans. Prior to the Goals address in the Final Environmental Impact Statement (FEIS) there are five of the goals needing special consideration in how the Impact Statement is finalized. Two of the five have already been highlighted as having issues not well examined in the DEIS, Goal No. 4, Housing Affordable to all Income Groups and Goal No. 10, Environment. Goal No. 7, Permits - Timely and Fair, Goal 11, Citizen, Participation & Coordination and Goal No. 14, Climate Change and Resiliency are to be discussed here. Goal No. 6, Property Rights is reserved for the next set of comments. Pertinent to Goal No. 7, Permits - Timely and Fair - Each plan alternative needs to be discussed in the EIS in terms of whether this goal can be achieved, i.e., does one alternative verse another promote the possibility that permits can be secured in a timely and fair manner. Context for this discussion analysis needs to reference that Kitsap County's existing permit process, whether for land use-based permits or building permits have time frames far in excess of the proscriptions for Permit processing and approval in Kitsap County's own Procedures Ordinance Kitsap County Code 21.04. Suffice to say the ordinance calls for project approval/ permit issuance in 120-days (21.04.250) after the date of application completeness. There are quite a few caveats in the ordinance for time extensions, but suffice to say, the permit review process is rife with delays and individual applicants can be waiting as long as two- years just to get to a public hearing (if one is required) and not permit issuance. In the assessment of each plan alternative, the EIS must address how one or the other alternatives (once adopted) will promote timely and fair permit issuance. Of particular note, since there is a housing crisis (as detailed in the 2020 Kitsap County / Bremerton housing study, ECO Northwest's Final Report March 2020, p v), providing housing more affordable requires some 700 homes to be built per year to get to the projected need of 25,150 new homes by 2036. The County's building permit approval data (a) published on the Department of Community Development's website) for new single family homes indicates that within the last three years, there have been only about 338 approved building permits or one half the amount needed per year. Even if multiple family, i.e., tri-plexes, four-plexes and buildings with five or more units are added in only 45-such building permits have been issued within the last three-years. One conclusion is, Kitsap County does not now have a permit approval process to accommodate the projected influx of new people planned for in the next 20-years. So, how will the 2024 Comprehensive Plan update address this shortage, which appears to be related to the log-jam of permit processing in the Department of Community Development? A question perhaps related to plan implementation, but in consideration of the three plan alternatives, which such option would promote the address of this housing shortage crisis? There is another aspect to this goal, "fairness" that deserves comment. One problem clearly evident in Kitsap County's Department of Community Development (DCD) related to permit processing is the complicated set of regulations adopted without any regard to the cost of how these regulations will be applied in the review of permits. Most of these ordinance provisions are "environmental" or storm water control related. A few are spawned out of Kitsap County's Zoning Ordinance and subdivision code. Taken together, there is not enough staff in DCD to provide an efficient review of the relevant code restrictions with respect to an individual building permit or land use related approval. This is an issue, devoid of any discussion the DEIS, presumably because it is plan implementation rather than plan proposal related. But, since the Comprehensive Plan does envision its consideration in the permit approval process, this is an issue worthy of address in the EIS. Also related to this issue is for then of the EIS to discuss presumption that the permit applicant will bear the cost of plan implementation. That statement is made in full recognition that there are infrastructure obligations undertaken by either the County or one of its taxing districts. The real issue in fairness is the answer to the question of what lies in the confines of the "public interest?" If, for example, it is in the public interest to adopt draconian regulatory measures, then it follows that the "public" should pay the "lion's share" of associated costs of regulation compliance. That is not the evident stance of County Government. Rather, the position taken by the County is to make it the applicant's responsibility for such compliance in the form of fee assessment (to included impact fees), study analysis (mostly environmental related) and site improvement costs, primarily related to storm water control infrastructure. One direct consequence of "regulatory compliance" by the applicant is directly related to the ever-increasing cost of housing across all income categories. Aside from the fact this "fairness issue" deserves analysis in the Comprehensive Plan EIS, a component of such analysis should include a discussion of the real need for the multiplicity of regulations now plaguing the County's permit review process.</p>	<p>Your comments on the goals of the GMA are noted. The EIS is not scoped to conduct a full analysis of the goals of the GMA. The Board of County Commissioners is charged with adopting a comprehensive plan that meets state requirements as defined in the GMA, subject to appeal to the Growth Management Hearings Board.</p>	Letter	3.2.2.1
320	Kitsap Alliance of Property Owners	<p>Goal No. 11, Citizen Participation and Coordination - The DEIS in Section 1.2.2 entitled Public Participation highlights the "opportunities" for public involvement to include the State Environmental Policy Act (SEPA) public review process. This critique of the DEIS is one such example of an "opportunity" for public participation to provide comment.</p> <p>But while these comments might prompt a response or even a change in the content of the Final EIS, citizens cannot influence the content of the Comprehensive Plan itself if grant funding is tied to a specific provision such as in the instance of the County-wide Planning Policies (previously the subject of discussion herein). Also, citizens cannot suggest or recommend that a provision in the plan is bogus and therefore should not be included in the plans provisions, like "climate change" or so-called "best available science," which in reality is "junk science" as previously noted. Clearly, the persuasion of state agencies and their opinion will override any contrary data or commentary presented by citizens of Kitsap County.</p> <p>In reality, the 2024 Comprehensive Plan Update is not a citizen derived plan reflecting their goals and objectives for the future of Kitsap County. Instead, the plan update is an agency driven plan intended to control the people who comprise the county, i.e., control where they live, how they must live, how they travel and what they must do in order to find community here. Exaggeration? Hardly if one pays attention to the substance of this critique of the DEIS or indeed the plan's provisions when one of the three alternatives are pursued or aspects of one of the three.</p> <p>Consider by contrast what was achieved in an earlier era, when true comprehensive planning could take place. Kitsap County has Silverdale and the Ridgetop development. Such could not be approved in a GMA compliant plan, especially since it does not foster the private / public sector partnership brought it to be along with Trident Impact Funding from the US Navy. Ironically, Silverdale is now a primary "center" in the County, but no other "center" could be created today from such a farming area. The State Agencies vis-a-vis GMA and their funding programs would not allow it regardless of the opinion of the citizens and property owners.</p> <p>Sadly, citizen input is limited to comments, but not real participation with even a chance that their vision of what Kitsap County might hold for its future.</p> <p>Goal No. 14 Climate Change and Resiliency - Of course this is a new focus for plan provisions. In the DEIS beginning with section 3.1.2 Air Quality/Climate, there is a so-called link to "biophysical impacts and impacts to economic and social systems."</p> <p>The assessment attempt here in this portion of the DEIS to somehow relate population growth to climate impacts, is nothing short of ludicrous. Just adding more people to Kitsap County's land area does and will have impacts, on the natural and built environments, in all sorts of ways. Keep in mind that one of the "mandates of GMA" requires jurisdictions like Kitsap County to house their fair share of the incoming population - impacts notwithstanding.</p> <p>First and foremost, there is no scientific proof of anything other than the earth's climate changes that occur, at least in the United States four-times per year. And despite some claims by individuals with scientific training, United Nations members and the Governor of this state, the global data does not exist to support a claim that global warming is a threat to mankind's way of life.</p> <p>As an incidental note, the reason for a change from the earlier nomenclature of "global warming" to the term "climate change," is that the populists quoted in the media could not reconcile "deep freezes" in winter months such has occurred there in the US over the last 15-years, with a warming trend. Also, not reconcilable are the observations of polar bears and their migration patterns. So much more hype that did/does not fit the narrative, was thought to be resolved by this same populist media when it switched from "global warming" to "climate change," which can mean anything.</p> <p>Pertinent to Air Quality/ Climate, the plan alternative that promotes a dispersed pattern of development, clearly is the option with the least emissions impact option. See also previous discussions under the headings of Untenable pursuit of the Compact Growth/ Urban Center Focus and lack of proper foundation analysis of environmental features.</p>	<p>Thank you for your comment. Your feedback will be forwarded to County decision makers.</p>	Letter	3.2.2.1

DEIS Public Comment Response Matrix

#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
321	Kitsap Alliance of Property Owners	<p>LACK OF COMPLIANCE WITH BOTH THE US AND WASHINGTON STATE CONSTITUTION'S PROVISIONS FOR THE PROTECTION OF THE RIGHTS OF PEOPLE TO OWN AND USE THEIR PROPERTY WITHOUT UNDO RESTRICTIONS</p> <p>This issue is encapsulated in Goal No. 6, Property Rights - Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.</p> <p>Of the now 15-goals of GMA this one typically has the least ink devoted to how a plan and subsequent implementing ordinances will implement this goal. For example, there is no correlation between a plan and implementing ordinance such as the Critical Areas Ordinance (CAO) requirement to have the property owner provide for stream protective buffers (or possibly the riparian habitat zone). Since such restrictions limit the use of his, her or their property while providing a "public benefit," the reality is, the private property owner is burdened, really penalized, because of what the public has declared a benefit. Yet the public bears no responsibility for what they believe is in their best interest.☒</p> <p>What needs to be addressed in the Comprehensive Plan EIS is how the person owning property is protected from the overreach of government rule making. Specifically, there needs to be an understanding reflected in this analysis of what the Washington State Attorney General, published in September 2018 as his "Advisory Memorandum and Recommended Process for Evaluating Proposed Regulatory or Administrative Actions to Avoid Unconstitutional Takings of Private Property."</p> <p>A follow-on note, causing property owners proposing to develop their property to have to apply for a Variance, a Reasonable Use Exception or a Conditional Use Permit (either administratively or public hearing approved), is nothing but a penalty levied against the property owner for no personal benefit. The public bears no responsibility and assuming permit approval, the only thing gained for all that expense is a project with some conditions to placate some ordinance requirement.....an unfair burden on the property owner, which should be borne by Kitsap County.</p>	Thank you for your comment. Your feedback will be forwarded to County decision makers.	Letter	3.2.2.1
322	Kitsap Building Association	<p>The Kitsap Building Association firmly believes that every resident of Kitsap County deserves the right to achieve the ultimate American Dream: owning a home. Alternative 3 is the only alternative suggested in the draft environmental impact statement that works towards making this dream a reality. The situation we are currently in is dire: Puget Sound Regional Council's Vision 2050 estimates over 800,000 households being added to the Puget Sound region over the next 26 years. Kitsap County's consultant, who was hired to conduct a housing analysis for this Comprehensive Plan Update, estimates that Kitsap will need to add over 25,000 housing units to accommodate its share of this massive growth. Alternative 2, while providing much needed incentives and zoning changes to make multi-family construction more realistic, does not go far enough to foster the correct market conditions that will allow enough units to be built.</p>	Thank you for your comments. Your feedback on the alternatives will be forwarded to County decision makers.	Letter	2.4
323	Kitsap Building Association	<p>The Kitsap Building Association suggests that the county combine the elements from alternatives 2 and 3 that allow for the greatest number of units to be constructed. Alternative 2 leads us to believe that younger generations, for whom home ownership is becoming increasingly unlikely, must be subjected to multi-family style living by decreasing the amount of single-family detached homes that can be built. While it is true that we need more multi-family housing, we also need more detached single-family homes for households to eventually move into. The only way you can combat a housing shortage is by building more housing. Alternative 3 is the clear better option in terms of promoting detached single-family residences. However, we would also like to see the incentives and zoning changes for urban center development that are currently only available via Alternative 2. If the county wants to encourage more multi-family housing construction, then it needs to increase the amount of property that is zoned for that use. A combination of Alternatives 2 and 3 is the correct path forward to ensure the regulatory environment encourages all forms of housing. Continuing on the path of increased regulations will only lead to unaffordable housing, government subsidies, (a vicious cycle of increasing costs), and disenchantment of more people who have less hope for their future.</p>	Thank you for your comments. Your feedback on the alternatives and blending for a preferred alternative will be forwarded to County decision makers.	Letter	2.5
324	Kitsap Building Association	<p>Issues with Housing Analysis</p> <p>The draft EIS housing analysis presents a delineation and trend of the overall housing units permitted within unincorporated Kitsap County from 2012 to 2022 in Exhibit 29. This exhibit shows a consistent trend of permitted single family residential development exceeding that of permitted multifamily development throughout the study period, even in the years 2021 and 2022. We believe this data is incorrect. We are certain most residents of Kitsap County have witnessed that multifamily development has been booming for the past several years throughout the county and in the cities. No mention of this boom is included in the analysis. While footnote 10 references a couple of multifamily developments being potentially applicable but not included, that is a significant understatement and disservice to the overall analysis. By omitting key data, it appears that the housing analysis is determined to show an ongoing housing trend that fits the desired narrative aimed at supporting selection of the Alternative 2, nicknamed in the draft EIS as the "bending the trend" Alternative.</p> <p>The Housing Analysis is supposed to provide "key information to help contextualize and update existing conditions in housing...". This is important data and information that must be clearly understood when it is a major basis for the Alternatives. If multifamily development is underestimated to such a significant degree, then it follows that buildable land availability in the zoning districts designated for future multifamily development is overstated on that basis. Combining this with the pending revisions to the Critical Area Regulations, the buildable lands available for multifamily development within the UGA must be over-estimated for the 20-year period to 2044. Anyone currently involved with conducting feasibility assessments for potential multifamily projects within the existing UGA boundaries knows this.</p>	Thank you for your comments. We will check the numbers on multifamily permits and revise as appropriate in the final EIS.	Letter	
325	Kitsap Building Association	<p>Parking</p> <p>The discussion regarding more multifamily development must also include the rather large obstacle of parking requirements. A reduction in parking requirements should be available under both Alternatives 2 and 3, not just 2. Pg. 68. Garages should also count towards parking under both alternatives 2 and 3. There is no reason that a garage can count for parking under one alternative but not the other. Pg. 68. Cities impose parking requirements to pre-empt (or in response to) residential neighbors and retailers from complaining their free street parking is consumed by multifamily dwellers. Parking requirements make less sense in the city core (where the multifamily development is expected to occur) where short-term parking and permit parking are enforced. Here, developers will respond to (or anticipate) market demand for parking. The more flexible the parking regulations are, the quicker newer supply can be delivered affordably.</p>	Thank you for your comments. Your suggestions on reduction in parking requirements as mitigation will be considered by County decision makers for the preferred alternative and additional parking flexibility will be contemplated as additional potential mitigation as part of the final EIS.	Letter	3.2.2, 3.2.5
326	Kitsap Building Association	<p>Traffic Mitigation</p> <p>The issue of traffic mitigation is also worth mentioning. With the level of expected growth that is coming, it would make sense for the county to make investments in transportation infrastructure in order to help accommodate. However, with a projected increase in traffic of 72% by 2044, the EIS simply states that there are no transportation improvements needed for the county to maintain compliance with the required level of standard. Pg. 343. This is a shocking statement that should be met with high levels of scrutiny, especially when considering that transportation impact fees were raised an unprecedented 514% just three years ago.</p>	Thank you for your comment. The County will continue to invest in transportation infrastructure to accommodate growth as growth occurs, even though the countywide LOS/concurrency threshold is not met. The project list within the EIS includes projects to reach acceptable LOS on each facility.	Letter	3.2.6.3

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327	Kitsap Building Association	It must also be mentioned that the vast majority of proposed future roadway projects are focused in the rural areas. Appendix C – Transportation Project by Alternative of the EIS. They will also be adding pedestrian and bike facilities to accommodate these projects. Ibid. Wouldn't the dollars the county is spending on these projects be better spent constructing similar pedestrian and bike facilities inside the UGA, or perhaps reducing requirements for future road frontage improvements that developers will need to build when infilling and redeveloping. Removing that burden from future multifamily development is one way to help with affordability, which will be much more effective than building amenities in the rural areas for only a select few to enjoy.	Thank you for your comment. Your comment will be forwarded to County decision makers.	Letter	Appendix C
328	Kitsap Building Association	Critical Areas Ordinance Update It also must be stated that any discussion regarding UGA boundaries and buildable lands cannot be had until the Critical Areas Ordinance Update has been finalized and adopted. The land use portion of the comprehensive plan process hinges on an update to critical areas code that is not complete. The KBA, and the Kitsap community at large, are being done a disservice by being asked to comment on a comprehensive plan before the Critical Areas Ordinance process has been completed. How can we make suggestions in good faith without knowing what critical area buffers we will be working with?	The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.		2.5.8, 3.1.2.3, 3.1.4.1, 3.1.4.2
329	Kitsap Building Association	Conclusion In conclusion, the county must acknowledge that a public-private partnership is required in order to ensure enough housing is built to accommodate the growth that is coming. There must be compromises made to allow younger generations to experience the dream of homeownership. Regulations play a key role in making that happen or preventing that from happening. We urge the board of county commissioners to adopt a combination of Alternatives 2 and 3. This is the most equitable path forward and will foster strong development for years to come.	Thank you for your comments. Your feedback on the alternatives will be forwarded to County decision makers.		2.5
330	Kitsap County Council for Human Rights	This comment is in reference to the Draft Environmental Impact Statement (DEIS) studies three land use alternatives. Options 1 and 3 do not support and uphold human rights for all residents of Kitsap County. Option 2 supports compact growth and contributes to the promotion and protection of human rights in several ways: 1. Access to Basic Services: a. Affordable Housing: Compact developments have efficient land use, leading to the availability of affordable housing options. This ensures that everyone has access to adequate housing, a fundamental human right. b. Transportation: Compact developments have well-planned public transportation systems, reducing commuting times and expenses. This benefits individuals who may not own single-occupancy vehicles and ensures their human right to freedom of movement. c. Utilities and Infrastructure: Efficient land use allows for better planning and distribution of utilities and infrastructure. Compact growth facilitates the provision of essential services like water, sanitation, and electricity to a larger population, supporting the human right to a standard of living adequate for health and well-being. 2. Social Inclusion: a. Proximity to Opportunities: Compact growth concentrates economic, educational, and cultural opportunities in central areas. This reduces disparities in access to these opportunities, promoting social inclusion and the human right to participate in cultural, social, and economic life. b. Community Interaction: Compact areas foster a sense of community, enabling social interactions and the exchange of ideas. This contributes to the human right to freedom of association and the right to participate in civic affairs. 3. Environmental Sustainability: a. Reduced Environmental Impact: Compact growth promotes sustainability by reducing urban sprawl, thus minimizing the environmental footprint of cities, contributing to the human right to a healthy environment for present and future generations. b. Preservation of Green Spaces: Compact areas prioritize the preservation of green spaces within urban areas, providing Kitsap County residents with access to nature. This supports the human right to enjoy the benefits of cultural and natural heritage. 4. Equitable Access to Opportunities: a. Employment Opportunities: Compact developments attract diverse businesses and industries, offering a variety of employment opportunities. This helps in realizing the human right to work and to free choice of employment. b. Educational Facilities: Compact urban planning allows for the efficient placement of educational institutions, ensuring that Kitsap County residents have access to quality education, promoting the human right to education. 5. Reduced Inequalities: a. Economic Equality: Compact growth contributes to more equitable economic development by concentrating resources in more developed centers. This reduces socio-economic inequalities, aligning with the principle of non-discrimination and equal protection under the law. b. While compact growth offers these advantages, it's essential that planning policies are implemented with a focus on inclusivity, affordability, and social justice to truly support human rights for all Kitsap County residents.	Thank you for your comments. Your feedback on the alternatives will be forwarded to County decision makers.	Letter	2.5
331	Kitsap County Council for Human Rights	Additionally, from an environmental perspective, there are individuals who are currently unhoused due to barriers associated with housing availability. While development occurs over the course of twenty years, how do we work on reducing the environmental impact of systemically reinforced economic and housing disparities from a human rights perspective? As population increases, how do we determine where waste goes? Who disposes of it? Where folks without housing will be staying in the meantime? Will this increase their visibility and subsequent discrimination based on class?	Thank you for your comments. The revised Comprehensive Plan periodic update and FEIS will contain information on how the County can accommodate its allocated need for emergency shelter beds and permanent supportive housing. The Comp Plan also contains goals, policies, and implementation strategies aimed at mitigating and reducing homelessness.	Letter	3.2.3
332	Kitsap County Council for Human Rights	Lastly, when it comes to expanding infrastructure, the environmental impact statement particularly focuses on housing and economic infrastructure. However, environmental impact also needs to include considerations about expanding and developing resource infrastructure, including expanding the space or number of offices required by community resources, such as primary care offices, behavioral health facilities, utility resource centers, food banks, etc. If this is not considered, this will increase the burden on already struggling systems and reduce healthcare and resource equity.	Resource infrastructure is important. For the sake of a high-level non-project EIS, specific uses like primary care offices, behavioral health facilities, resource centers, food banks, etc are not examined specifically to the environmental impacts of those uses, but rather the general land use categories they fall into and the impacts of different land use patterns.	Letter	3.3
333	Kitsap County Council for Human Rights	Please also note the KCCHR attempted to include these DEIS comments on February 26, the date noted on https://www.kitsap.gov/dcd/Pages/ComprehensivePlanUpdate_2024.aspx that comments would be collected through, and the comment form was not accepting comments.	Noted. Kitsap County provides multiple electronic and in-person avenues for feedback to ensure redundancies in the case of glitches in one or more of these options.	Letter	N/A
334	Leah and Kurt Smith	Folks, I had intended to comment within the allotted time, thinking it went to the end of the day today. However, it appears that the comment form has been removed from the website. So, perhaps my comment is for nothing, but I want to try anyway. My husband and I have lived in Kingston since 1995. We treasure the woods and wetlands that surround us. As time has gone on, and development has evolved, it seems that the rules are bent, exceptions are made and zoning changes are not very difficult to accomplish. With more and more people moving to our area, I believe it's time to make implementation of zoning changes more difficult in order to preserve the rural and treed areas that we have. It's what makes us unique. It's also time to get very serious about preserving ground and surface water, growing trees, and protecting the flora and fauna associated with our particular environment. We support Alternative 2.	Thank you for your feedback. Your comments on the procedure for zoning changes and the alternatives will be forwarded to County decision makers.	Email	2.5

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335	Lisa Pederson	First, and foremost, I found the page numbering in Chapter 3 to be irregular and confusing, namely duplicate page numbering under “Natural Environment” and “Built Environment: Land Use and Transportation”. Page numbers should not be duplicated like this, and hopefully in the Final EIS the page numbering will show a proper page numbering system to eliminate confusion. Also “3.1.2 Air Quality/Climate” in the Table of Contents does not even show a page number, instead it shows “ Error! Bookmark not defined.” An example of the page confusion: In looking up Puget Sound Regional Council Vision 2050, Table of Contents showed 3-30. On the first try, I went to the wrong page 3-30.	Thank you for your comment. The DEIS did have some page numbering issues that will be corrected in the Final EIS.	Letter	Multiple
336	Lisa Pederson	P. 3-19, under section 3.1.2 Air Quality/Climate, paragraph 2, “Changes to seasonal precipitation, including snowpack, are projected to reduce hydropower’s reliability in the energy sources available to the county.” Comment: This sentence should be deleted since it does not apply to Kitsap County since the County does not get any of its water from snowpack.	Thank you for the comment. Electric power available in Kitsap County does rely on hydropower generated elsewhere and purchased by Puget Sound Energy, so this content is accurate despite the (accurate) comment that there is no snowmelt in Kitsap County.	Letter	3.1.2
337	Lisa Pederson	P. 3-20 “Kitsap County does not appear to have a current tree canopy cover inventory that could be referenced as the baseline condition.” Comment: Why doesn't it? Might include explanation as to why it doesn't.	The preferred alternative likely will explore enhanced critical areas requirements and address new critical area buffers, which will increase tree canopy. Kitsap County is also exploring tree retention on land not encumbered by critical areas or their buffers. The EIS was developed with best information available at the time.	Letter	3.1.2
338	Lisa Pederson	P.3-33 Shows mitigation measures for air quality/climate referencing goals and policies listed in 2016 Comprehensive Plan. Comment: Since the rural community is going to have significant impacts as well, why aren't the policies and goals for the rural communities listed as well? I have listed some that would should be added to this section: Land Use Goal 14. Foster rural businesses and business opportunities on designated commercial and industrial lands in the rural area, while balancing protection of rural character. (p.1-22) Land Use Policy 57. Unlimited expansion of commercial and industrial uses in the rural areas is not appropriate. Accordingly, only limited new commercial and industrial uses will be permitted in the rural areas. Such commercial and industrial uses must be consistent with Growth Management Act and Comprehensive Plan requirements for rural areas, preserve Kitsap County’s rural character, and shall not allow urban-type uses or services. (p.1-22) Land Use Goal 15. Develop strategies for future use and compatibility for properties used for minerals.(p.1-24) Land Use Policy 77. Require that all plats, short plats, development permits, and building permits issued for development activities on, or within five hundred feet of, lands designated as mineral resource lands, contain a notice that the subject property is within or near designated mineral resource lands on which a variety of commercial activities may occur that are not compatible with residential development for certain periods of limited duration. (p.1-24) Land Use Goal 16. Develop a strategy for use and compatibility of properties used for timber production. Land Use Policies 80-85 (p.1-25) Comment: The above goals and policies should be included in the DEIS since on page 3-36 under 3.1.2.4 Air Quality – Significant Unavoidable Adverse Impacts, the DEIS states “Regional growth under all alternatives increases energy needs and impacts forest canopy cover. Tree losses projected for the alternatives cannot be wholly avoided given net developable acres in the county. However, regulations to protect and replace significant trees can minimize this unavoidable impact.” Comment: This should be a priority in the rural areas where development is encroaching onto wooded areas resulting in a great loss of tree canopy.	Thank you for your comments regarding tree canopy – please see comment response above. Additional existing policy mitigation for air quality/climate impacts will be added to the Final EIS as appropriate. Thank you for your suggestions.	Letter	3.1.2
339	Lisa Pederson	P.3-38 “Due to the lower elevations, none of the streams are supported by snow runoff (Williams et al. 1975)” Comment: I don't think this should be in since our county has no snow runoff since we have no snowpacks. Also, is the highlighted reference listed in the DEIS somewhere? I could not locate it. Side note: I have attached a newspaper article written in 2009 where Commissioner Steven Bauer talks about the county's water supply where there are no snowpacks here.	The Final EIS will include some additional context on top of the reasoning cited in the paper regarding snowpack.	Letter	3.1.3.1
340	Lisa Pederson	P. 3-41 and 3-42 show a chart, Exhibit 3.1.3.1-2 Existing conditions of the county’s Shorelines of the State. Comment: It does not mention North Kitsap County but it should since Gamble Creek contains excellent coho and chum habitats and limited spawning habitat. See https://srp.rco.wa.gov/project/170/14107 . It flows into Gamble Bay, supplying it with coho salmon.	Additional information Gamble Creek will be added to the Final EIS as appropriate.	Letter	3.1.3.1
341	Lisa Pederson	p.3-48 Kitsap County Critical Area map – Comment: this map uses 2 similar pink colors making it hard to determine which risk I'm looking at, even magnified to 400%!	Thank you for your comment. This is the existing Kitsap County critical area map. Your comment will be forwarded to County decision makers so the map can be improved in the future after the updated Critical Areas Ordinance is adopted.	Letter	3.1.3.1
342	Lisa Pederson	p.3-68 “Areal extent continues to be reduced throughout Kitsap County and the Puget Lowland” Comment: What does “Areal Extent” mean?	Areal extent refers to the physical limits of where this forest type can be found as seen on the landscape or on a map.	Letter	3.1.4.1
343	Lisa Pederson	p.3-76 under Forage Fish, spawning grounds have been documented in Kitsap County. Comment: DEIS should include reference as to where this happens.	Additional information on where forage fish spawning grounds have been found will be added to the Final EIS as appropriate.	Letter	3.1.4.1
344	Lisa Pederson	P.3-79 Paragraph one states, “Increased stormwater runoff from new impervious surface areas and roadways may result in increased contaminants and pollutants in habitats under all alternatives, including 6ppd-quinone”. Comment: I think a definition of what this is should be included and what it does to salmonids.	Information on what 6ppd-quinone is and what its effects on salmonids are will be added to the Final EIS.	Letter	3.1.4.2
345	Lisa Pederson	P.3-83 Impacts of Alternative 3 “Dispersed Growth Focus”, Comment: states Alternative 3 would provide for increased growth primarily through expansion of existing UGAs by approximately 1,082 acres overall but doesn't mention the 418.8 acres of forest land in the North Kitsap rural area that would be reduced by a rezoning application request going from RW to RR.	The rural rezoning will be added to this section on Alternative 3 in the Final EIS.	Letter	3.1.4.2
346	Lisa Pederson	P.3-20 Last sentence in fifth paragraph “... residential and auto-oriented commercial uses ringing the downtown.” Comment: Not sure why the word “ringing” is used and what it means, can a better word be found?	Ringling refers to encircling or going around. This language will be clarified in the Final EIS.	Letter	3.2.1.1
347	Lisa Pederson	P.3-29 The 2022-2050 Regional Transportation Plan is a transportation plan for the central Puget Sound region. As most people don't experience transportation based solely on the jurisdiction they live and travel through the region. Comment: not a complete sentence since it begins with the word “As”.	Thank you, this typo will be corrected in the Final EIS.	Letter	3.2.2.1
348	Lisa Pederson	P. 3-35 “Both the Suquamish Tribe and the Port Gamble/S’Klallam have tribal lands within Kitsap County. The Tribes have control over development that occurs on those lands and develop plans to guide that growth. Other than Tribal lands, the Port Gamble/S’Klallam and Suquamish Tribes have usual and accustomed areas throughout the county as well.” Comment: What does highlighted portion mean?	“Usual and accustomed areas” is a term from the so-called Boldt Decision (United States V. Washington, 1974) that enforces and implements reserved fishing rights for treaty tribes for salmon and steelhead in western Washington.	Letter	3.2.2.1
349	Lisa Pederson	P.3-47 Population Change Summary chart 1990-2022 Comment: this chart needs to be reformatted since the letters letters and numbers are off set and make the chart hard to read, Also, why is there no data in spaces? Also, where does the rural population come in to this chart?	Formatting in this chart will be corrected in the Final EIS. Data in this chart are limited to what is produced in intercensal and postcensal estimates by the Office of Financial Management. Kingston and Silverdale are the only urban areas in unincorporated Kitsap County for which OFM produces these estimates.	Letter	3.2.3.1

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350	Lisa Pederson	P.3-58 Sentence beginning with "Householders aged 55 and older represent", Comment: I think homeowner is a better suitable word.	Householder refers to head of household as defined by the Census Bureau and encompasses both households that own their dwelling unit and those that do not.	Letter	3.2.3.1
351	Lisa Pederson	P.3-62 Sentence "County's rate of adding new housing units between 2000 and 2010 by adding new housing ..." Comment: spaces need to be fixed.	Spaces will be fixed in the Final EIS.	Letter	3.2.3.1
352	Lisa Pederson	P.3-63 "(see Exhibit 3.2.3.1-20 below)" Comment: "below" should be changed to "next page" or just deleted.	Noted.	Letter	3.2.3.1
353	Lisa Pederson	P.3-69 "Housing cost burden can put households in vulnerable situations and force them to make trade-offs between housing costs and other essentials like food, medicine, or transportation. This unstable condition can also lead to rental evictions, job instability, school instability for children, and homelessness. Since housing at the low-income cost range is rare, most households in this income range pay more than 30% of their income for their housing. Low-income households that are severely cost burdened are at high risk of homelessness if a household crisis emerges" Comment: Has Kitsap County counted the population of the homelessness in the County? On page 3-70, it states, "...severe cost burden (paying more than 50 percent of household income on rent) increased sharply, from 18 percent of renter households to 30 percent," Comment: This suggests there may be a large homeless population in this County. This population is important and suffers from a severe significant impact because the County does not have adequate housing for low-income individuals. This should be addressed in the DEIS.	Kitsap County conducts a Point in Time count of unsheltered individuals. The last published count, from 2023, included 604 individuals. High rates of severe cost burden are likely to influence rates of homelessness. Additional language on qualitative impacts of increased homelessness will be added to the Final EIS as appropriate.	Letter	3.2.3.1
354	Lisa Pederson	P.3-87 Comment: In the section titled Impacts of Alternative 3, "Dispersed Growth Focus", it states that of the three alternatives, Alternative 3 would have the most potential to affect cultural resources. Not mentioned in this DEIS is the rezoning request for 418.8 old timber forest land owned by Raydient currently zoned RW (1 unit per 20 acres) and requested to be rezoned to RR (1 unit per 5 acres) and one 24 acres RW to Rural Commercial. North Kitsap United recently had its own environmental impact statement done of this property, including an individual report done on the cultural findings dated December 8, 2023. Titled "Cultural Resources Assessment for the North Kitsap United Project, Kitsap County, Washington", it can be found as "Appendix D: Site Cultural Resources Report Cultural Resources Westland Resources)." Following is the report's Conclusions and Recommendations " As discussed in the Anticipated Finds section above, background research indicates that there is a moderate potential for encountering historic period cultural resources and a low potential for encountering precontact cultural resources in the API. This cultural resources assessment revealed that very little of the API has been surveyed previously; based on the results of the assessment, there is a potential for extant cultural resources in the API. Therefore, WestLand recommends that a cultural resources survey of the entire API should be conducted. This should include 100 percent pedestrian survey of the API and shovel testing in areas and on landforms with a higher likelihood of encountering cultural resources, to be determined based on field observations. Comment: This is a new study and a reference that DCD should incorporate into the DEIS.	Thank you for your comment and making the County aware of this additional study. The DEIS evaluates potential impacts of the overall alternatives on cultural resources. Additional study may occur for site specific requests or project proposals.	Letter	3.2.4.2
355	Lisa Pederson	Comment Regarding Why Alternative 3 Should NOT allow Rezone of RW (1 unit 20 acres) to RR (1 unit 5 acres) and Rezone of RW to RC of a total 417.98 acres (31 parcels) as requested by Raydient, ID 72.	Noted.	Letter	2.5
356	Lisa Pederson	First, there is an obvious difference of opinion between how the citizens of the county view this rezone and how North Kitsap United (NKU), comprised of a partnership of Raydient, Kingston Rotary and the YMCA view it. At the December 12, 2023 meeting NKU had to go over its environmental studies, Jon Rose explained reason for the rezone, "We're asking for the most common zoning in North Kitsap." For our benefit, we are asking to rezone the lots from 20 acre lots to 5 acre lots. That's what we are asking for." First Comment: Two things that popped out to me about this explanation is: 1) Raydient doesn't care about protecting the county's rural environment and character since the only reason they are asking for a rezone on a busy state highway which is already border lining on urban sprawl where he wants to put the NKU project is because it is the most common zone in the county and 2) Raydient is asking for the rezone for their benefit, like Mr. Rose stated, not the community's. He goes on to explain that if he gets the rezone, Raydient will provide a certain amount of land to the community as a gift, free of charge. North Kitsap doesn't have much RW left and to change 400+ acres of RW to RR because its the most common is not justification to change the zoning.	Thank you for your comment. Your feedback on this rural rezone request will be forwarded to County decision makers.	Letter	2.5
357	Lisa Pederson	Second Comment: He presented this vision as "Hypothetical Concept B" on slides he was showing, but in reality, I see this as only a marketing negotiation tactic, a little short of a bribe to get what his company wants.	Noted.	Letter	2.5
358	Lisa Pederson	Third Comment: Since there is no actual development site plans for a permit, I don't think the Commissioners should approve this zone request at this time. In reviewing NKU's Feasibility Study, on page 4, it states, "This report was written in the context of one potential development scenario provided by the Owner including: • One large community sports and recreation facility (including a YMCA and approximately 40 acres of sports and recreation. • Five acres of commercial use. • Eighty residential lots. To be conservative, each lot was assumed to include one primary and one accessory dwelling unit (ADU) as permitted in the Rural Residential zone."	Thank you for your comment. Your feedback on this rural rezone request will be forwarded to County decision makers.	Letter	2.5
359	Lisa Pederson	Fourth Comment: In Mr. Rose's presentation, he did not mention ADUs in his Concept B slides. And, the study states this was a conservative estimate. We do not know what will happen to that property if it is rezoned without a site development application and permitted being approved first. On page 13 of the NKU Feasibility Study, you will find they have incorporated a strip retail plaza, estimated to be 2,000 sqft low to 4,000sqft high in the trip generation section. Again, the citizens of Kitsap County have no way of knowing what a rezone for this project will do to our rural environment along State Highway 307 (Bond Road), but we do know it does not comply with the mandates of the Washington State GMA, The Vision 2050 Regional Growth Strategy, as stated in the Puget Sound Regional Council Vision 2050(on page ES3) and in the NKU's Feasibility Study confirms this site has moderate erosion hazards and moderate deep landslide hazards, which will need "further studies once development plans become more final"(p.19).	Thank you for your comment. Your feedback on this rural rezone request will be forwarded to County decision makers.	Letter	2.5
360	Lisa Pederson	I feel the DEIS should be updated page 3-5 and 3-15 to include this site's moderate hazards.	Thank you. The County will examine additional information that has been provided on geologically hazardous areas on this site and include in the Final EIS as appropriate.	Letter	2.5
361	Lisa Pederson	Final Comment: As time is dwindling for me to turn in this DEIS comments, I will close for now. In conclusion, by looking at all the comments your department has received from the asking for this rezone request by Raydient/Jon Rose, application ID 72 to be denied, in which I fully agree, and now to add my request for the denial and removal of this rezone request from Alternative 3. The rezone does not have to happen now since there is no way of knowing exactly what will become of this property. Too many unknowns for a rezone to happen. I appreciate being given this opportunity to submit my comments regarding the DEIS.	Thank you for your comment. Your feedback on this rural rezone request will be forwarded to County decision makers.	Letter	2.5

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
362	Nancy Langith and Kingston Stakeholders	<p>Height Requirement</p> <p>In looking at the strategies above, modern retail spaces must have sufficient height and are smaller and shallower. The Port proposal raises the height to 55” where KCAC and the UVC working group support preserving the current height allowances (35’/45’) in the UVC / Old Town. Among Stakeholder members responding, there was unanimous support for “ 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 is open on the shoreline/parking lot side of the street.” We understand the Port’s concern for additional height, but do not want a tunnel effect with the higher building heights. Is there a compromise that will better serve the community?</p>	<p>Thank you for your comment. Your feedback on proposed height increases in areas of Kingston will be forwarded to County decision makers.</p>	Letter	2.5.1
363	Nancy Langith and Kingston Stakeholders	<p>Requirement for Mixed Use</p> <p>Again, the Stakeholders support flexibility in the development of our downtown core. The downtown Kingston retail mix is still recovering from the impacts of the pandemic and suffering from changes in consumer behavior. In a strongly performing retail market, sales and rents can both be high, as in a good retail proforma rents are a percent of sales. In Kingston, as sales are likely weak, rents are likely low and property owners are struggling to keep tenants. The best strategy to improve conditions is to focus on support for existing retailers, helping them to grow their business, which will attract other retail and enable existing retailers to pay higher rents. In a healthy downtown, there is active retail at street level. The worst impact to downtown Kingston’s recovery would be vacancies, as a vacant storefront can depress sales at adjacent businesses, further stresses property owners and sends negative signals to potential customers. In these circumstances, non-retail uses at street level, though not ideal, are less damaging than a vacant storefront. When market conditions improve and retailers can pay higher rents, property owners will likely be motivated to replace non-retail uses with retailers who can pay higher rents. Stakeholder members were split between wanting 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 and the same response with the addition that it applies only to new buildings. We strongly encourage the County to consider the potential impacts of new regulations and avoid requirements that might result in vacancies.</p>	<p>Thank you for your comment. Your feedback on mixed use requirements will be forwarded to County decision makers.</p>	Letter	2.5.1
364	Port Gamble S’Klallam Tribe	<p>The draft EIS contains language declaring that “Kitsap County has adequate water resources to meet the need for water supply of expected population growth and allocation under all three alternatives” (3-238). This analysis relies upon the ability of Kitsap PUD to transfer water from relatively larger sources (e.g. the Seabeck aquifer) to regions of the county experiencing elevated demand from population growth. The report also acknowledges the role county agencies in verifying adequate water supply in Type A and B water systems. The judgment for adequate water is based primarily upon sufficient pumping capacity to meet consumptive demand rather than preserving water tables or establishing long-term sustainable groundwater storage. An updated, county-wide groundwater management planning process is needed to establish longterm sustainable rates of groundwater extraction to preserve ecosystem health as well as consumptive uses.</p>	<p>If the County doesn’t move any rural changes forward with regard to groundwater, there are no new adverse impacts to be considered in the EIS. When a utility pulls from an aquifer, it needs to be consistent with their individual water system plans, which are required to be consistent with the countywide water system plan. If rural changes are contemplated in the future, supplemental environmental analysis may be needed.</p>	Letter	3.3.9.2
365	Port Gamble S’Klallam Tribe	<p>For permit exempt wells, the EIS relies on the unapproved WRIA 15 plan to mitigate for growth, an approach that is flawed:</p> <ul style="list-style-type: none"> • Mitigation projects are not guaranteed to be implemented and are instead subject to the future sponsorship of myriad private and public partners. Although the plan evaluates mitigation projects by likelihood of implementation, this raises a concern that certain projects will fail and select subbasins will not be sufficiently addressed. • Mitigation projects were allocated by broad subbasins in an attempt to prevent overall habitat loss, but not to account for streamflow reduction in smaller watersheds within those subbasins. Reliance on the WRIA 15 plan does not provide for protecting smaller streams from depletion by permit exempt wells. • The WRIA 15 plan does not provide for monitoring or enforcement necessary to protect smaller stream systems and broadly-distributed shallow aquifers. <p>The EIS lacks sufficient acknowledgement of climate impacts on shallow aquifer recharge. Changing precipitation patterns are expected to reduce recharge rates independent of development decisions. Together with longer, hotter summer dry periods, this threatens streamflow and the health of riparian ecosystems in a way that is not adequately monitored and cannot be mitigated by Kitsap PUD’s water transfers.</p>	<p>While emissions modeling was conducted to understand the climate change impacts of the alternatives studied in this EIS, given information available at this time, changing precipitation patterns that may be expected from climate change are expected to have the same impacts across the county from alternative to alternative, and we lack enough information to do more specific modeling and analysis at this time. Your comments on WRIA 15 are noted and forwarded to County decision makers.</p>	Letter	3.1.3.2, 3.1.3.3
366	Port Gamble S’Klallam Tribe	<p>The draft EIS does not adequately address key differences between the 3 alternatives in meeting the water resources challenges named above, although it does acknowledge the greater preservation of undeveloped open spaces in Alternative 2. Protection and enhancement of water recharge areas are necessary to sustain county water resources, and these goals are not adequately met by existing plans or the critical areas ordinance.</p>	<p>Additional information on the water resources differences between Alternatives will be provided in the Final EIS as available.</p>	Letter	3.1.3.2
367	Port Gamble S’Klallam Tribe	<p>Considerably more information for water resources and additional topics will be required in the FEIS before the Board can make an informed decision about the impacts and mitigation measures needed to achieve a “no probable significant adverse environmental impacts” decision for the Comprehensive Plan Update.</p>	<p>Noted. We hope to provide more detail on water resources and other topics as noted throughout this comment response set.</p>	Letter	3.1.3
368	Puget Sound Regional Council	<p>Technical information supporting the transportation element can be found across multiple documents, though primarily the DEIS and Capital Facilities Plan, making it challenging to account for all the required components. The county should consolidate required technical information in an adopted portion of the plan, which could be the capital facilities plan, an appendix, or the transportation element itself.</p>	<p>Thank you for the comment. This will be considered in the final EIS.</p>	Letter	Multiple
369	Puget Sound Regional Council	<p>The DEIS provides descriptive transportation inventories but provides limited mapping of facilities. Mapped inventories are not provided for state facilities, freight routes, or airports. See the Washington State Department of Commerce’s Transportation Element Guidebook, pages 108-114, for information about inventories of existing facilities and conditions.</p>	<p>A map of existing state facilities, freight routes, and airports throughout Kitsap County will be added to the document.</p>	Letter	3.2.6.1
370	Puget Sound Regional Council	<p>The DEIS includes project lists by alternative that address roadway level of service deficiencies. The 20-year list should also include system needs to advance other goals in the transportation element such as safety, maintenance and preservation, street connectivity in the regional growth center, improving transit connections, and addressing nonmotorized gaps. PSRC’s Transportation Element Guidance includes more information about development of the project list. While they do not need to be included in the project list, the plan should also describe projects advanced by other partners during the planning horizon, such as WSDOT and Kitsap Transit.</p>	<p>There is some discussion of other Agency Projects within the narrative of the document (reference of WSDOT and Kitsap Transit long range plans).</p> <p>The County will provide additional analysis related to many of elements.</p> <p>Will add reference to County’s Local Road Safety Plan to identify set of safety improvements. And also add reference to the non-motorized plan list of projects.</p>	Letter	Appendix C
371	Puget Sound Regional Council	<p>The role of the Kitsap County Non-Motorized Facility Plan is not clear in the draft plan. If this document is intended to fulfill the requirement for a nonmotorized component, the plan should be incorporated as a component of the comprehensive plan. The plan for implementation of nonmotorized projects should also be clear, and for projects included on the 20-year list as noted above, should include identification of project scope and costs, and how they will be prioritized and funded.</p>	<p>The NM plan will be included by reference in the final EIS.</p> <p>See transportation policies for strategies and policies for update of the NM plan following adoption of the new comprehensive plan.</p> <p>Multiple projects listed within Exhibit 3.2.6.3-1 provide benefits beyond improving roadway level of service alone, though these projects are listed to address impacts related to the proposed alternatives.</p>	Letter	3.2.6.1
372	Puget Sound Regional Council	<p>While the plan discusses revenue and revenue tools in the capital facilities plan, the transportation element should also analyze funding relative to identified multimodal transportation project costs.</p>	<p>Noted. Will address in Comp Plan.</p>	Letter	N/A

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
373	Puget Sound Regional Council	The plan should include a policy to prioritize investments in the designated regional and countywide centers, consistent with regional policy. The plan should include a policy to avoid adding road capacity in rural or resource areas.	Noted. Will address in Comp Plan.	Letter	N/A
374	Puget Sound Regional Council	Several urban growth area expansions are evaluated in the county's DEIS alternatives. Several rezones are proposed to accommodate the county's allocated housing need and increase residential capacity. In general, urban growth area expansions should be avoided, and any expansions should be based on identified countywide need, be well-documented, and consistent with state, regional, and countywide policy.	Noted. The alternatives were designed to elucidate differences in approach. In alternative 2, the County is maximizing opportunities for growth in our urban areas, thus lessening pressure on rural areas and a projected reduced rural share.	Letter	2.5
375	Puget Sound Regional Council	Two alternatives considered in the DEIS do not provide sufficient capacity to accommodate the county's share of housing need. The final comprehensive plan should include land use assumptions consistent with the growth targets and accommodate projected housing need.	Noted. The Board will be charged with selecting a preferred alternative that accommodates the County's share of the regional housing need.	Letter	2.5
376	Puget Sound Regional Council	The plan should include additional discussion of the tools the county is employing to reduce the rate of rural growth.	In alternative 2, the County is maximizing opportunities for growth in our urban areas, thus lessening pressure on rural areas and a projected reduced rural share. The Final EIS will contain a more detailed description of how the preferred alternative is bending the curve of rural growth down using a variety of tools and mitigation measures.	Letter	N/A
377	Puget Sound Regional Council	Analysis of racially disparate impacts, exclusion, and displacement should be included in the draft plan or accompanying housing analysis. Commerce provides guidance on how to approach analysis of racially disparate impacts.	Noted.	Letter	N/A
378	Puget Sound Regional Council	The plan includes several policies and strategies to address housing need. The plan should be supported by evaluation of barriers to affordable housing that may currently exist. Commerce's adequate provisions checklist can help document this work.	The Commerce checklist material on the Housing Element is being developed as part of revisions to the Housing Element.	Letter	N/A
379	Puget Sound Regional Council	The draft plan should include policies on working with school districts to support school siting and access.	Noted.	Letter	N/A
380	Puget Sound Regional Council	Once the county selects a preferred alternative, the Silverdale subarea plan should be updated with growth targets consistent with regional center guidelines.	The Silverdale Subarea Plan will be updated consistent with the regional center criteria once a preferred alternative is selected.	Letter	N/A
381	Puget Sound Regional Council	Silverdale currently has a density below 18 activity units per acre. Once a market study has been completed for the Silverdale regional growth center, please be sure to provide the document to PSRC staff.	Noted. The County is planning for a higher activity unit count and proposing a new Boundary for the center. The County will consider a market study for the 2025 timeframe and will coordinate with PSRC in 2024-2025 as the Silverdale subarea plan is updated.	Letter	N/A
382	Raydient	Thank you for reviewing the proposed changes and the comments regarding the Comprehensive Plan and the DEIS. In this letter we are providing comment in support of the DEIS alternative three. The changes to the Comprehensive Plan we are concerned with are the proposed changes to the Comprehensive Plan southeast of Port Gamble Heritage Park near the intersection of Port Gamble Road NE and Bond Road NE. The proposed action can be found in DEIS Appendix B, Reclassification Request Summary List, Line 72. The proposed action can also be found in DEIS Appendix A. Zoning Changes by Alternative, Alternative Three.	Noted.	Letter	Appendix A, 2.5
383	Raydient	We support alternative three that proposes to change the zoning of the majority of the approximately 400-acre area from Rural Wooded to Rural Residential, with a small area located adjacent to Bond Road to be changed to Rural Commercial.	Thank you for your comment. Your feedback on the rural rezone will be forwarded to County decision makers.	Letter	Appendix A, 2.5
384	Raydient	We see two strong reasons to approve this alternative. First, one of the primary purposes of the Rural Wooded Zone is to preserve forest land for future timber harvest. The land in question has been in ownership of forest production companies for more than a century. However, with the closure of the Port Gamble Mill, the creation of the Port Gamble Heritage Park, and the increased population of North Kitsap County, the land in question is no longer viable for timber production and harvest. As such, a zoning designation that is intended to preserve land for timber production and harvest is no longer appropriate. In selecting the appropriate designation, the rural residential zone is representative of the rural zoning in the surrounding area with the exception of the zoning used to protect Port Gamble Creek. Which leads to the next point.	Noted. Your feedback on the rural rezone will be forwarded to County decision makers.	Letter	Appendix A, 2.5
385	Raydient	Second, the subject 400 plus acre area contains nearly no critical areas. We have commissioned wetland, stream and geotechnical studies of the area and have found that the majority of the site is well drained soils. Surface water infiltrates into the soils nearly immediately. Ravines through this area do not support flowing water. Depressions do not support wetlands. The majority of the slopes are not steep enough to create stability concerns. This land is remarkably free of surface water and geologically related critical areas. In some areas of Kitsap County where critical areas are found, such as Dogfish Creek in Big Valley, or Port Gamble Creek, other zones are used for environmental protection. Since the subject 400 plus acre area does not contain these critical areas, it makes sense to use the zone designation that the County has used for the majority of rural Kitsap County. That zone is Rural Residential.	Your feedback on the rural rezone will be forwarded to County decision makers.	Letter	2.5
386	Raydient	Along with this comment letter, we are submitting our feasibility study. This document contains the findings of environmental and geotechnical consultants. Their findings show that the subject property is appropriate for the designations of rural Residential and Rural Commercial. In addition, we are submitting our supporting letter from our initial application.	Thank you.	Letter	2.5
387	Shannon Stephens	I meant to submit this through the website, but it looks like I can no longer submit a comment there. I assumed I could submit anytime today. I hope you will take this-- thank you!	Comment received. Kitsap County provides multiple electronic and in-person avenues to ensure redundancies.	Email	N/A
388	Shannon Stephens	I'd like to voice my support for Alternative 2, and state my opposition to the Raydient and Island Lake rezone requests. To protect our farms, wetlands, forests, and the wild creatures who call this place home, we should concentrate growth close to the town center.	Thank you for your comment. Your feedback on the alternatives and the rural rezones will be forwarded to County decision makers.	Email	2.5
389	Squaxin Island Tribe	The Squaxin Island Tribe's concerns for the rural areas on the south end of the County are directly tied to development patterns in its cities and urban growth areas. We understand that you are using these alternatives as bookends for environmental review. We see Alternative 2: Compact growth/Urban center focus as most aligned with protecting the water resources and fish resources of the Squaxin Island Tribe. Part of our strategy for survival of salmon in South Puget Sound is to preserve the best habitat that remains for those species. For Squaxin U&A, that includes the rural areas of southern Kitsap County. Increased growth in rural areas is contrary to that strategy. Concentrated growth in urban areas and disincentivizing growth in rural areas will help maintain salmon habitat in rural areas. Allowing increased density in rural areas (like, for example, upzoning from RR1/10 to RR1/5) causes habitat fragmentation for terrestrial and aquatic life.	Thank you for your comment. Your feedback on the alternatives and rural development patterns will be forwarded to County decision makers.	Letter	

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
390	Squaxin Island Tribe	Regarding mitigation of impacts in DEIS Alternative 3 with larger Type N Buffers (p. 1-13) The County is offering up a wider Type N stream buffer width in Alternative 3 as mitigation for more dispersed growth. The Tribe would not support any proposed riparian buffer widths less than SPTH200 (One site-potential tree height or 200 ft, whichever is larger). In Washington Department of Fish and Wildlife’s (WDFW) Riparian Ecosystems Volume 2: Management Recommendations (p. 3-28), WDFW recommends to local jurisdictions, “The scientific literature review (see Volume 1) informs WDFW’s position that protecting the area within one SPTH200 from the edge of a stream channel maintains full riparian ecosystem functions for all aquatic species, including salmon, and promotes healthy, intact riparian ecosystems.” If this poses a challenge inside Urban Growth Areas(UGA’s), no matter which DEIS alternative, then the County needs to reconfigure densities and building heights to accommodate that, or mitigate by protecting equivalent land areas outside the UGA’s. Regarding nonconforming lots in light of riparian buffers, and requested variances to make those buildable, the County should take on this problem as a whole and establish a process to resolve the problem or leverage existing processes to solve the problem.	The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter	
391	Squaxin Island Tribe	Water Resources- Impacts to Groundwater-(p. 1-9 -1-11) Impacts to groundwater are described as loss of pervious surfaces and pollution to groundwater from the land surface. Yet groundwater pumping is also an impact that should be listed. The County has added the draft WRIA 15 Watershed Restoration and Enhancement Plan on p. 1-11 as potential mitigation, though stream depletion of groundwater pumping is not listed as an impact. DEIS Alternative 2 leads County development in the direction of concentrated growth relying on public water systems with existing water rights. Though public water systems have their own significant impacts, they are preferable to dispersed growth with proliferation of permit-exempt wells in rural areas.	If the County doesn’t move any rural changes forward with regard to groundwater, there are no new adverse impacts to be considered in the EIS. When a utility pulls from an aquifer, it needs to be consistent with their individual water system plans, which are required to be consistent with the countywide water system plan. If rural changes are contemplated in the future, supplemental environmental analysis may be needed.	Letter	
392	Squaxin Island Tribe	Surface Waters (p.3-52) Pumping of groundwater affects all kinds of freshwater surface water bodies. This fact is stated on p. 3-55. “Increased water supply demand can impact the underlying aquifers, increase susceptibility of saltwater intrusion, and reduce the groundwater baseflow which contributes to stream flows.”	Noted.	Letter	
393	Squaxin Island Tribe	Relationship of the Comprehensive Plan to the WRIA 15 Watershed Restoration and Enhancement Draft Plan “The purpose of the Water Resource Inventory Area (WRIA) 15 Watershed Restoration and Enhancement Plan is to identify projects and actions intended to offset the impacts of new domestic permit-exempt (PE) wells to streamflows. The Watershed Restoration and Enhancement Plan is one requirement of RCW 90.94.030. Watershed Restoration and Enhancement Plans must identify projects to offset the projected consumptive impacts of new PE domestic groundwater withdrawals on instream flows over 20 years (2018-2038) and provide a net ecological benefit (NEB) to the WRIA.” The Squaxin Island Tribe did not approve this plan, partly because of lack of commitment of Kitsap County and the Washington State Department of Ecology to find projects and to implement the plan. However, the Salmon Recovery Funding Board (SRFB) has made recommendations to Ecology for modification and approval of the plan. Ecology will likely approve some version of the plan. The Tribe expects Kitsap County to actively seek and sponsor projects to implement the plan. It’s the County’s growth and therefore the County’s responsibility to mitigate.	Noted.	Letter	
394	Squaxin Island Tribe	Water Supply (Section 3.39) Question: How many Group B water systems does Kitsap County have. How many of those Group B systems have water rights, and how many use permit-exempt wells?	Using best available information from the Kitsap County Health Department, the following estimates were derived. These estimates will be included within additional analysis of groundwater resources in the FEIS. •There are approximately 16,700 exempt private and two-party private wells in the County (including Bainbridge Island). •5,278 of those are believed to be two-party private wells. •Their distribution is roughly: 2,170 Bainbridge, 5,515 North Kitsap, 3,170 Central Kitsap, and 5,845 South Kitsap (based on commissioner districts). •There are 808 Group water systems, 160 of them have a water right. •The Group B distribution is roughly: 135 Bainbridge Island, 285 North Kitsap, 180 Central		
395	Suquamish Tribe	The Suquamish Indian Tribe of the Port Madison Reservation appreciates the opportunity to provide additional review of the Draft Environmental Impact Statement (DEIS) and supporting documents for Kitsap County’s 2024 Comprehensive Plan Update.	Noted.	Letter	
396	Suquamish Tribe	Concurrent with issuing the DEIS, the County has published proposed amendments to Kitsap County Code Title 16 (Land Division), Title 17 (Zoning), and Title 18 (Environment). Additionally, at this time, the County is reviewing its Critical Areas Ordinance (CAO), the County’s primary mechanism to reduce impacts to Fish and Wildlife conservation areas (streams/riparian areas), Frequently Flooded Areas, Geologically Hazardous Areas (steep slopes), and Critical Aquifer Recharge Areas.. The CAO is undergoing review for compliance with Best Available Science (BAS). However, at this time there are no published proposed changes to the CAO despite the DEIS frequently referring to the CAO as a protective mechanism. In effect, reviewers are being asked to accept changes in UGA without an ability to review the extent to which proposed changes to CAO reflect BAS or potential environmental impacts. As noted in the DEIS, “The Board of County Commissioners will select a preferred alternative based on this Draft EIS in April of 2024.” Page 2-11 of the DEIS states: “The Board is not limited to selecting the alternatives exactly as set forth in the EIS and may select an alternative that combines various features of the alternatives set forth in the EIS. However, the selected alternative must be within the range of alternatives addressed by the EIS (WAC 197-11-655(3)(b)).” The DEIS makes numerous references to significant impacts but does not quantify them. In the absence of information about how the CAO will be amended, the DEIS is unable to provide the Board, Tribe and public with sufficient information to discuss environmental impacts select a reasonable alternative, or include mitigation measures, that would avoid or minimize adverse impacts or enhance environmental quality. County staff have said that the CAO updates will undergo their own separate SEPA review at a later date. However, wording in the DEIS, such as that for stream buffers, suggests the County has already decided upon stream buffer widths. Updates to the CAO and the Comprehensive Plan should either be on substantially the same time path or the CAO updates should already be completed so reviewers are aware of the potential impacts resulting from what is being proposed.	The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter	
397	Suquamish Tribe	As noted in the Tribes comments on the “Draft Land Use Alternatives”, the “Tribe (1) does not support the rezoning of rural protection parcels to more intensive uses; (2) believes growth should be accommodated within the existing UGA and only when that is filled should it be expanded; (3) the UGA should not include riparian areas such as Grovers and Chico creeks to protect groundwater recharge; and (4) though not currently identified, does not support increased density within the Suquamish LAMIRD.”	Thank you for your comments. Your feedback on the alternatives and rural rezones will be forwarded to County decision makers.	Letter	

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398	Suquamish Tribe	Others, such as the City of Poulsbo have expressed opposition to upzoning large parcels of rural land. In a letter dated November 6, 2023 and entitled “EIS Alternative, City of Poulsbo Opposition to Alternative 3 rezoning request” the City of Poulsbo states its “strong opposition to the rezoning application submitted by Jon Rose (aka Raydient) for the vacant, 413.9 acres located off of and north of Bond Road, which seeks to change the zoning designation from Rural Wooded (RW) to Rural Residential (RR) (aka Reclassification Request #72). The Tribe concurs with the City’s statement “Upzoning land outside of UGAs runs counter to the fundamental purpose of the GMA and undermines the careful planning and thoughtful development that the Act seeks to achieve” as well as rationale stated in the City’s letter.	Thank you for the comment. Your feedback on the rural rezoning request will be forwarded to County decision makers.	Letter	
399	Suquamish Tribe	Aquifer Recharge Throughout the DEIS, the issue of reduced groundwater is generally looked at through the lens of reduced groundwater due to consumptive use. However, the impacts of development upon groundwater recharge as well discharge to springs and streams need to be quantified. The DEIS mentions changes in hydrology as a significant unavoidable adverse impact, but the DEIS and CAO (as currently written) do nothing to quantify the impacts of growth-related decreases in infiltration over a typical water year. Such impacts can and must be quantified. Whether an action is considered to generate an impact, often depends upon the information collected and how that information is analyzed as well as an understanding of the limitations and assumptions in the models or assessment used to quantify impacts. And then even if something is recognized qualitatively as an impact, it is often not quantified.	The FEIS will consider factors that impact groundwater recharge such as increased impervious surfaces and will consider any mitigation to impacts.	Letter	
400	Suquamish Tribe	The DEIS refers to numerous significant adverse impacts yet does not proposed an effective methodology to quantify them or describe mitigation measures, for example, development induced changes in water infiltration despite the DEIS on page 1-12 states: “Long-term cumulative reduction in groundwater recharge and associated discharge to streams” is a significant unavoidable adverse impacts.	The FEIS will consider factors that impact groundwater recharge such as increased impervious surfaces and will consider any mitigation to impacts.	Letter	
401	Suquamish Tribe	Furthermore, the DEIS states in many cases an impact may occur (such as found on pages 1-10, 3-12, and 3-26), rather than is expected to occur or will occur. Though for any single project, some impacts may be considered de minimus, but when taken collectively, such as expanding the UGA/increasing impervious surfaces the DEIS has acknowledged some of these impacts are significant. For accuracy, the Tribe requests that “may occur” should be written as “will occur”. It also indicates additional mitigation measures (such as found on pages 1-11, 3-63) might be required, but neither the DEIS nor the current CAO requires the collection of information needed to quantify the scale of impact and resulting mitigation needs to offset those impacts.	The County believes a change from “may occur” to “is likely to occur” is appropriate. As mentioned previously, changes to the CAO are still under development, and much more detailed information about mitigation of impacts by the proposed CAO will be included in the Final EIS.	Letter	
402	Suquamish Tribe	Declining baseflows also need to be considered in the context of increased intermittency of seasonal streams in both space and time, and converting perennial streams to seasonal streams.	Additional language on declining baseflows in the context of intermittency of seasonal streams will be added to the Final EIS as appropriate.	Letter	
403	Suquamish Tribe	Fish and Wildlife Habitat Conservation Areas It should be noted that the Washington Department of Fish and Wildlife Best Available Science ¹ for riparian areas, as recently reviewed by the County, ² recommends significantly wider buffers than those proposed by the County for both non-fish and fish bearing streams. The DEIS outlines three Alternatives and proposed increased protection for non-fish streams under Alternative 3 (Dispersed Growth Alternative), but there are no proposed increased stream buffers for non-fish streams under Alternative 2 (Compact Growth/Urban Center Focus) - even though development will continue outside the UGA. Alternative 3 (Dispersed Growth Alternative) the DEIS (page 3-45) states there will be “increased stream buffers, from 50 feet to 100 feet, for non-fish-bearing streams.” However, there is no proposed increase in buffer width for non-fish streams for Alternative 2 (Compact Growth/Urban Center Focus). The expansion of buffers widths to 100 feet for Alternative 3, might be based upon the following statement from recent WDFW guidance on riparian areas. “Where neither SPTH200 nor the extent of the riparian vegetative community is at least 100 feet, we recommend RMZ delineation of a minimum distance of 100 feet, because this distance will achieve 95% or more removal efficacy of phosphorous, sediment, and most pesticides. ³ ” Rentz et al is Best Available Science and goes on to state on page 4 (emphasis added): “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 remains available for protection is not enough to provide the full functions and values Washington’s fish and wildlife need.” And also on page 4: “In reviewing the current science literature for Volume 1, we found no evidence that full riparian ecosystem functions along non-fish-bearing streams are less important to aquatic ecosystems than full riparian ecosystem functions along fish-bearing streams. Washington Department of Fish and Wildlife Best Available Science ⁴ for riparian areas as recently reviewed by the County ⁵ indicates significantly wider buffers than proposed by the County are required for non-fish streams and larger buffers for most fish bearing streams.	As mentioned previously, the DEIS was deliberately conservative with regard to protection of critical areas. Changes to the CAO including incorporation of Best Available Science, which are still under development, are likely to be more protective of environmental resources and reduce impacts. More detailed information about mitigation of impacts by the proposed CAO will be included in the Final EIS.	Letter	
404	Suquamish Tribe	Though describing the length of non-fish streams affected (for example, see pages 1-10), the DEIS does not describe the length of affected fish streams. Erroneously, the County is presuming these are non-fish bearing streams, most likely based on County maps. These maps have a great deal of error as described later. Furthermore the DEIS focus on stream length is directed towards land that will be encumbered by buffers, rather than the impacts to the stream channel. Additionally, the DEIS implies that impact is proportional to the length of stream segment within or adjacent to the upzoned parcels. There are two issues with this. First, it does not appear to consider stormwater travels downstream so in addition to the new length stream affected by the UGA expansion, there is the downstream channel subject to cumulative stormwater effects to be considered. Second, by using length of stream rather than area of upzone, the implication is that each upzone has the same affect. While length might be more applicable for impacts to the functions such as shading and wood recruitment, area is most likely a more appropriate measures for potential changes to infiltration and thus impacts to groundwater recharge and stream baseflows. This premise is implicitly acknowledged in the following statement from page 1-12: “Direct impacts on plants and animals from intensification of development are assumed to be proportional to the amount of impervious surface created in specific areas.”	The FEIS will quantify stream lengths for both Type N streams and Type F streams that are mapped. With regard to stream length, the DEIS is based on the best information available countywide, which are the County’s critical areas maps.	Letter	

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
405	Suquamish Tribe	The EIS should acknowledge that the correct stream typing of many streams is unknown, hence the importance for surveys to be conducted in accordance with approved stream typing methodology. The CAO, as currently written, allows for many small or seasonal Type F streams to be erroneously categorized as Type N. . In the absence of verification of whether these streams are fish bearing or not, perhaps a better word choice for what the information the DEIS is trying to convey is simply to use the word streams, rather than the current wording will states as fact that these streams are non-fish bearing waters and potentially mislead property owners. In the absence of verification that a stream is not Type F, it should be assumed that it could potentially be a Type F. Impacts to affected non-fish streams which are tributary to fish streams are still an impact to downstream fish habitat. This is implicitly acknowledged in the statement on page 3-235: "Even if one or more of the mitigation measures is implemented, there could still be some changes to existing stormwater runoff patterns. This could alter flow conditions downstream of the planning areas and could potentially aggravate existing downstream flooding and erosion problems" However, while the DEIS only acknowledges the impacts of increased flood volumes or velocities upon spawning habitat it has restricted that discussion to the effects of development in the floodplain and not included the effects of upland development generated stormwater. Additionally, there is no explicit acknowledgement that increased flows can affect fish passage.	The Final EIS will contain an acknowledgement of unknown or incorrect stream typing and increased flows having an effect on fish habitat.	Letter	
406	Suquamish Tribe	Mitigation The definition of mitigation in SEPA at times does not match the non-SEPA usage. From 197-11-768 (2) Minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts; To "minimize" something is to reduce it to the smallest amount or degree. To "reduce" something is simply to make it smaller. When the EIS refers to minimize, it actually means reduce. Avoidance should be the preferred mitigation measure.	The Final EIS will clarify terms like "minimize" vs "reduce." Thank you for the input.	Letter	
407	Suquamish Tribe	The County will rely greatly upon Critical Areas (page 1-11 and other) to "identify and protect critical areas, including water resources like streams, wetlands, frequently flooded areas, and critical aquifer recharge areas.". However, the CAO as currently written does not required an evaluation of many impacts, such as development induced changes to the typical volume of water infiltrated over a year.	Changes to the CAO including incorporation of Best Available Science, which are still under development, are likely to be more protective of environmental resources and reduce impacts. More detailed information about mitigation of impacts by the proposed CAO will be included in the Final EIS.	Letter	
408	Suquamish Tribe	The DEIS relies upon numerous speculative or voluntary mitigation measures for which the County lacks the authority or staff to implement or require. For example, such as voluntary project identified under the Kitsap Regional Shoreline Restoration Plan (DEIS pages 1-11, 1-13, 3-85). Some mitigation measures are suggested as encouragement (such as pages 1-7, 1-11, 3-16), rather than obligatory. Furthermore, the County is relying (such as noted on pages 1-11, 3-38, 3-39) upon the unadopted "WRIA 15 Watershed and Restoration and Enhancement Plan" to offset consumptive water use from permit-exempt wells. The Suquamish, Port Gamble, and Squaxin tribes have opposed this plan (see the Suquamish Tribe comments on WRIA 15 plan previously forwarded to Kitsap County). This plan contains no assurances that there is water for water mitigation. Furthermore, there is little effort made to deal with consumptive water uses from non-exempt users and no more than a qualitative discussion of potential impacts of development upon water infiltration and no means proposed to quantify the loss in infiltration. Yet, the DEIS on page 1-12 under Significant Unavoidable Adverse Impacts states: "Long-term cumulative reduction in groundwater recharge and associated discharge to streams."	Thank you for your comments. Your feedback about WRIA 15 is noted. There is no analysis of consumptive water use from non-exempt users because when a utility pulls from an aquifer, it needs to be consistent with their individual water system plans, which are required to be consistent with the countywide water system plan. If rural changes are contemplated in the future, supplemental environmental analysis may in fact be needed.	Letter	
409	Suquamish Tribe	There is reference to existing salmon habitat restoration plans on page 1-11 (and others) that reads: "Consider state, local, and tribal restoration plans to ensure salmon recovery is prioritized. These include the Chico Watershed Plan, Curley Creek Watershed Plan, and the Natural Resource Asset study." This is most welcome, but many of these plans are voluntary and beyond the control of the County to implement. However, the County should read these plans as providing guidance and detailed information of key areas for development to avoid or areas that required larger buffers.	Noted. Updates to the CAO, including potentially larger buffers, are still forthcoming. More details about mitigation provided to these areas and others by proposed updates to the CAO will be included in the Final EIS.	Letter	
410	Suquamish Tribe	Page 1-11 and others refers to additional mitigation measures that may be needed to ensure adequate protection of anadromous fish. These measures are most welcome and if implemented will ensure the stream channel is more resilient to climate change and stormwater. However, given the current degraded state of many stream channels and riparian areas, they should be considered "as needed" rather than may needed.	Noted, language will be changed to "as needed" in the Final EIS.	Letter	
411	Suquamish Tribe	Specific comments on the DEIS are presented in Annex A. Comments on proposed draft development regulations for Title 16 Subdivisions and Title 17 Zoning (which also included the proposed tree retention/replacement standards) are incorporated as comments to applicable sections of the DEIS are presented in Annex B.	Noted.	Letter	
412	Suquamish Tribe	Considerably more information is required in the FEIS before the Board can make an informed decision about the impacts of the Comprehensive Plan and potential mitigation measures.	Comment noted.	Letter	
413	Suquamish Tribe	Page 1-2: The DEIS has failed to provide sufficient information is to provide an impartial discussion of significant environmental impacts and inform decision makers and the public of reasonable alternatives, including mitigation measures, that would avoid or minimize adverse impacts or enhance environmental quality for reasons outlined above and below.	Thank you for your comments. Your feedback will be forwarded to County decision makers.	Letter	1
414	Suquamish Tribe	Page 1-3: As noted above and below, neither the DEIS nor the CAO proposed a methodology to quantify some site specific impacts (such as changes in water infiltration due to development) and the resultant cumulative effects. Though, at this time there is little information on what might be actually developed at the locations subject to DEIS, there is sufficient information based upon proposed rezone request and current zoning to ballpark some proposed impacts, such as changes in infiltration due to new impervious surfaces. The Tribe is willing to work with the County to develop a methodology to ballpark these impacts.	The FEIS will consider factors that impact groundwater recharge such as increased impervious surfaces and will consider any mitigation to impacts. The County will be interested in working with the Tribe to improve understanding of a number of ecological aspects.	Letter	1
415	Suquamish Tribe	Page 1-5: Other issues include an insufficient understanding of the limitations of the CAO special reports to collect information needed to ensure the applicable CAO objectives are meet, the low resiliency of many stream channels to stormwater due to simplified channels, that impacts to aquatic life can occur at flows well below that required to cause channel erosion (the focus of stormwater management) etc.	More information proposed changes to the CAO will be included in the Final EIS. Additional context about simplified stream channels and impacts that may occur to aquatic life below flow levels that cause channel erosion will be included in the Final EIS as appropriate.	Letter	1
416	Suquamish Tribe	Page 1-6: A more accurate statement would be, "but reduce impacts to resources through the regulations of the ..." Additionally, the SMP buffers are typically much less than those required by the current CAO, let alone what BAS now indicates is needed.	Noted.	Letter	1.5
417	Suquamish Tribe	Page 1-6: Though the DEIS mentions reduction in infiltration, nothing is proposed to quantify the reduction in the volume that is infiltrated and thus the potential impact. Additionally, the current version of the CAO does not require quantification. This is an example of where an impact is acknowledged, but it not quantified.	Thank you for your comment. Modeling reductions in infiltration volume is not scoped as part of this non-project EIS.	Letter	1.5

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
418	Suquamish Tribe	Page 1-6: The intent of this statement stream flows consistent with native vegetation cover should be clarified. Is it to mean ranges consistent with pre-development conditions, or something else? Additionally, what is meant by range should be stated. Unless stormwater that would have previously infiltrated is infiltrated, there will be increases in the frequency and duration of sub-peak flows even through peak flows are reduced.	The language on stream flows consistent with native vegetation will be clarified in the Final EIS.	Letter	1.5
419	Suquamish Tribe	Page 1-6 (re: chronic soil contamination as a result of development activities): This impact will occur under Alternative 1 also, except the concentration and location will change.	Additional language on chronic soil contamination and the alternatives will be added to the Final EIS.	Letter	1.5
420	Suquamish Tribe	Page 1-6 (re: Alternative 2, "Intensification of development in current UGA boundaries and the limited UGA expansion areas would increase the extent of impervious surfaces, modify soil structures,"): Suggest adding "reduce volume of water that infiltrates to soil" (as noted in Alt 1) and contaminate surface and ground waters. Suggest wording as "similar housing capacity" to reduce the potential for any confusion that capacity refers to impervious surface and stormwater. Densification doesn't mean there are no environmental protections.	Noted. Language on Alternative 2 will be clarified as appropriate in the Final EIS.	Letter	1.5
421	Suquamish Tribe	Page 1-6 (re: Alternative 3, "The increases in UGAs would expand impervious surfaces, modify soil structures, and allow potential for chronic contamination of soils associated with development activities): Suggest adding "reduce volume of water that infiltrates to soil" (as noted in Alt 1) and contaminate surface and ground waters.	Noted. Language on Alternative 3 will be clarified as appropriate in the Final EIS.	Letter	1.5
422	Suquamish Tribe	Page 1-7 (re: "Kitsap County will encourage building sites" [...]): Encourage should be changed to require. The County's buffer requirements, though known to be inadequate based upon Best Available Science, are in many cases the maximum the County requires as the County allows administrative reductions in buffer width (see tables below), reduction that can be up to 50%. And these reductions can be made without any public or Tribal input, resulting in administrative decisions that might lack complete information. There should be no administrative reductions in buffer width.	Thank you for your comment. Your feedback on buffer requirements and administrative buffer reductions will be forwarded to County decision makers. More information on proposed updates to the CAO will be provided in the Final EIS.	Letter	1.5
423	Suquamish Tribe	Page 1-7 (re: "KCC Section 19.400.405" [...]): This is a potential example of where referencing the Comprehensive Plan DEIS prior to having the implementing ordinances roughly fleshed out impedes the ability to effectively assess the mitigative value of applicable regulations and commitments. The CAO is undergoing review and what it will require in terms of buffers, special studies or reports is unknown. For example, will slope failure runout zones be considered a geologically hazardous area.	The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter	1.5
424	Suquamish Tribe	Page 1-7 (re: "The corresponding increase in impervious surfaces and changes in hydrology would be correlated with the amount of growth-related development under each alternative."): The DEIS mentions changes in hydrology as a significant unavoidable adverse impact, but the DEIS and CAO (as currently written) do nothing to quantify the impacts of growth-related decreases in infiltration over a typical water year. Such impacts can and must be quantified.	Thank you for your comment. Hydrological modeling is not scoped as part of this non-project EIS.	Letter	1.5
425	Suquamish Tribe	Page 1-9 (re: "However, regulations to protect and replace significant trees can minimize this unavoidable impact."): Current County Code (19.150.575) defines significant trees as "any healthy tree that is at least eight inches in diameter at breast height (48 inches). A tree growing with multiple stems shall be considered significant if at least one of the stems, as measured at a point six inches from where the stems digress from the main trunk, is at least four inches in diameter. Any tree that is planted to fulfill requirements of this title shall be considered significant, regardless of size or species." It is unclear why the County considers only significant trees to contribute to efforts to minimize GHG emissions. Replacing trees does not address temporal loss impacts. See Annex B for more details.	The preferred alternative likely will explore enhanced critical areas requirements and address new critical area buffers, which will increase tree canopy. Kitsap County is also exploring tree retention on land not encumbered by critical areas or their buffers. The EIS was developed with best information available at the time.	Letter	1.5
426	Suquamish Tribe	Page 1-9: The potential impacts of growth-related decreases in infiltration upon groundwater and stream flows have not been quantified and need to be discussed in more detail.	Thank you for your comment. Hydrological modeling is not scoped as part of this non-project EIS.	Letter	1.5
427	Suquamish Tribe	Page 1-10 (re: "However, all alternatives must adhere to the policies and regulations to safeguard surface water and groundwater resources, as well as protect public health and safety from flood hazards."): There are numerous caveats and assumptions in stormwater management that are not fully described in the DEIS. A more detailed response is found in the main Water Resources Section.	Noted.	Letter	1.5
428	Suquamish Tribe	Page 1-10 (re: "Consequently, all alternatives would indirectly affect surface water resources with future development proposals. The creation of impervious surface areas and removal of forested areas associated with development activities in all alternatives will influence natural surface water systems (Booth et al. 2002)."): Groundwater is also influenced as noted elsewhere in the DEIS.	Additional language acknowledging the link between surface and groundwater resources here will be included in the Final EIS.	Letter	1.5
429	Suquamish Tribe	Page 1-10 (re: "The increased imperious surface area associated with continued urban development under Alternative 1 may reduce groundwater recharge area and could affect water quality from nonpoint urban runoff and point source contamination."): As noted elsewhere in the overall impact of development is to reduced groundwater recharge and degrade water quality. "May" and "could" should be changed to will.	The County will take a closer look at this language and change language in the Final EIS from "may" and "could" to "will" if appropriate.	Letter	1.5
430	Suquamish Tribe	Page 1-10 (re: Surface water impacts on streams under Alternative 2 would be greater in several basins and UGAs than those under Alternative 1 as a result of increased total impervious surface area in those basins."): As stormwater management focuses on reducing the potential for channel erosion, scant attention is paid to the observation that an additional impacts of development is that impervious surfaces area can result in an increase frequency of subpeak flows and create peaks where none existed before and by concentrating on the geomorphic threshold for channel erosion, overlooks biological thresholds for displacement and increased energy expenditures of aquatic life due to the increased volume of water discharged to the stream. These are direct impacts to aquatic life. 6PPD-q is a concern though mentioned in in the DEIS, more needs to be done. See comments to page 1-14.	Noted. Thank you for your comments. Your feedback on other impacts of increases in impervious surface area on biology and the impacts of 6PPD-q will be included in the Final EIS as needed.	Letter	1.5
431	Suquamish Tribe	Page 1-10 (re: "Water quality in riparian areas would be expected to decline in those areas where growth is greatest under Alternative 2."): Water quality will be expected to decline not only in areas where growth is greatest but all areas where there is development. Page 52 of the 2019 Stormwater Manual states (emphasis added): The engineered stormwater conveyance, treatment, and detention systems advocated by this and other stormwater manuals can reduce the impacts from development to water quality and hydrology. However, they cannot replicate the natural hydrologic functions of the natural watershed that existed before development, nor can they remove enough pollutants to replicate the water quality of pre-development conditions. Ecology understands that despite the application of appropriate practices and technologies identified in this manual, some degradation of urban and suburban receiving waters will continue, and some beneficial uses will continue to be impaired or lost due to new development. To mitigate impacts to riparian areas, the County should enforce buffer widths by denying most buffer reduction requests. Furthermore, without a database and associated maps describing the extent and location of the buffer reduction, the County is unable to ascertain the extent to which buffer reductions has reduced the riparian buffer width and thus functions and values. This is key to understanding cumulative effects.	Thank you for your comment. Your feedback on buffer reductions will be forwarded to County decision makers. Please note that the proposed updates to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter	1.5

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432	Suquamish Tribe	Page 1-11 (re: "Alternatives 2 and 3 would include adoption of revisions to critical area regulations;"): The relationship between the proposed buffers in this DEIS and what buffers might result from revision to the Critical Areas regulations should be stated. Separate environmental review of the updated Critical Areas Ordinance differs from establishing buffers. It should be stated in the Comprehensive Plan FEIS what proposed CAO changes the County intends to make with reference to the actual increase (such as 50 feet), rather than ambiguous terms such as increase.	As previously mentioned, the contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter	1.5
433	Suquamish Tribe	Page 1-11 (re: "The Kitsap Regional Shoreline Restoration Plan identifies several voluntary projects and programs to be implemented to improve shoreline functions over time."): As there is no requirement to implement these voluntary projects and programs, these should not be considered mitigation measures.	Noted. Thank you for your feedback. Your comments will be forwarded to County decision makers.	Letter	1.5
434	Suquamish Tribe	Page 1-11 (re: "Consider state, local, and tribal restoration plans to ensure salmon recovery is prioritized."): These state, local, and tribal restoration plans should also be read as areas where development should be steered away from as well as guidance to where buffers should be increased over standard requirements.	Noted.	Letter	1.5
435	Suquamish Tribe	Page 1-11 (re: "Additional mitigation measures may be needed to ensure adequate protection of anadromous fish including, but not limited to:"): Wording in the Ecology and Kitsap Stormwater manuals clearly indicates additional mitigation measures beyond stormwater facilities is required. A more detailed commentary follows later.	Additional mitigation measures beyond stormwater facilities will be contemplated and included in the Final EIS as appropriate.	Letter	1.5
436	Suquamish Tribe	Page 1-11 (re: "Increased stormwater management requirements near riparian management zones to increase channel complexity;"): Please clarify the intent of this stormwater management requirement. If the intent is to increase stream channel complexity, that is most welcome. If the intent to do something else? Or is the intent is to increase instream hydraulic complexity, such as increasing the quantity of habitat components that increase pools (see below)	This language will be clarified and made more specific in the Final EIS.	Letter	1.5
437	Suquamish Tribe	Page 1-11 (re: "Establish benchmarks in floodways to accommodate additional flows;"): Please clarify the intent of this statement. Is the intent to establish "benches" to provide for additional conveyance?	This language will be clarified and made more specific in the Final EIS.	Letter	1.5
438	Suquamish Tribe	Page 1-11 (re: "Encourage habitat components that will create pools to provide shelter to salmonids and other anadromous fish."): Wording in the Ecology and Kitsap Stormwater (quoted elsewhere in this letter) clearly indicates additional mitigation measures beyond stormwater facilities is required. Projects that over the water year discharge a total volume of stormwater to the stream exceeding the existing condition should be considered to have create an impact to aquatic life and provide mitigation. The mitigation would depend upon project location, presence of Type F streams at the project site, ability of the project to provide wood from land clearing to County or fisheries enhancement groups, funding to fisheries enhancement groups, etc.	Additional mitigation measures beyond stormwater facilities will be contemplated and included in the Final EIS as appropriate.	Letter	1.5
439	Suquamish Tribe	Page 1-12 (re: "Impacts to both surface and ground water resources are expected, including increasing peak flows, channel incision, and reduced groundwater recharge, and may be unavoidable as new impervious surfaces are created and vegetation is removed with development activities."): Additional unavoidable impacts are an increased frequency of subpeak flows and create peaks where none existed before and by concentrating on the geomorphic threshold for channel erosion, overlooks biological thresholds for displacement and increased energy expenditures of aquatic life due to the increased volume of water discharged to the stream. These are direct impacts to aquatic life	Impacts of new impervious surfaces will be more comprehensively described in the Final EIS.	Letter	1.5
440	Suquamish Tribe	Page 1-12 (re: "Long-term cumulative reduction in groundwater recharge and associated discharge to streams."): The DEIS admits that this is an impact, but neither the DEIS, nor the exiting CAO does anything to quantify the scale of loss of infiltration due to increased impervious surfaces are or consider which areas might be the most vulnerable in terms of reduced groundwater inputs to streams and wetlands. Site specific and cumulative alterations in infiltration need to be quantified for all developments where, over the water year, the development discharges a total volume of stormwater to the stream exceeding the existing condition, and mitigation required.	Noted. Hydrologic modeling is not scoped as part of this EIS. Additional information on this regarding proposed changes to the CAO will be included as appropriate in the Final EIS.	Letter	1.5
441	Suquamish Tribe	Page 1-12 (re: "Critical areas, including streams and wetlands, would receive similar protection under each of the alternatives with some increased protections for riparian areas in Alternative 3."): The wording in the DEIS indicates the increased protection (increase of buffer from 50 to 100 feet) is for non-fish streams, so DEIS overstates the increased protection. No additional protection is proposed for fish streams nor streams under Alternative 2.	As previously noted, the contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter	1.5
442	Suquamish Tribe	Page 1-12 (re: "Development of properties within or near environmentally critical areas could result in increased impacts to wetland and riparian habitat functions and values."): Streams should be added to this sentence.	Streams will be added to this sentence in the Final EIS.	Letter	1.5
443	Suquamish Tribe	Page 1-12 (re: Alt 2 impacts): See previous comments in Water Resources about wording in this section.	Noted.	Letter	1.5
444	Suquamish Tribe	Page 1-12 (re: Alt 3 impacts): See previous comments in Water Resources about wording in this section.	Noted.	Letter	1.5
445	Suquamish Tribe	Page 1-13: See previous comments in Water Resources about wording in this section.	Noted.	Letter	1.5
446	Suquamish Tribe	Page 1-14 (re: "The County could consider incorporating standards beyond" [...]): A major hurdle to upgrading existing water quality treatment facilities is the lack of space as no consideration was given to the potential need for feature components arising from changes in science or BMPs. Similar to the requirement for a reserve septic field, the County should require some additional area be set aside for projects subject to water quality treatment in case the Ecology review indicates additional stormwater treatment is needed to treat 6PPD-q. These areas can be considered as open space, unless needed for water quality treatment. If there is no requirement for a reserve set aside, then the FEIS should acknowledge that certain chemicals might not be treated effectively.	Thank you for your feedback. Your comments on potential additional set aside requirement for water quality treatment will be forwarded to and considered by County decision makers.	Letter	1.5
447	Suquamish Tribe	Page 1-16 (re: "Proposed policy changes include a tree retention standard,"): The tree retentions standard is a draft. Additionally, the proposed standards allow for the trees in required buffers to be considered part of the standard, when they should not be. See Annex B for more details.	The preferred alternative likely will explore enhanced critical areas requirements and address new critical area buffers, which will increase tree canopy. Kitsap County is also exploring tree retention on land not encumbered by critical areas or their buffers. The EIS was developed with best information available at the time.	Letter	1.5
448	Suquamish Tribe	Page 1-16 (re: "increasing stream buffers to 100 feet,"): It should be specific that this if for non-fish streams.	The statement on increased buffers will be made more specific as to where it applies in the Final EIS.	Letter	1.5
449	Suquamish Tribe	Page 1-30 (re: "With advanced planning, review of development applications, and implementation of mitigation measures, there should not be unavoidable adverse impacts from any of the three alternatives. The level of unavoidable adverse impacts depends on the degree that potential mitigation measures are implemented. Even if one or more of the mitigation measures is implemented, there could still be some changes to existing stormwater runoff patterns. This could alter flow conditions downstream of the planning areas and could potentially aggravate existing downstream flooding and erosion problems."): The statement of unavoidable adverse impacts is not supported by Best Available Science nor current County Code.	Thank you for your feedback. This section on unavoidable adverse impacts will be reworked in the Final EIS. Please note that proposed updates to the CAO are still being developed; more detail will be included in the Final EIS.	Letter	1.5

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
450	Suquamish Tribe	Page 2-13 (re: "Alternative 3, "Dispersed Growth Focus" Expanded buffers along mapped nonfish streams.): It should be clarified what is meant by "mapped non-streams". For example, does it mean streams that are currently mapped as non-fish streams excluding unmapped streams that are later found, or does it include not yet discovered non-fish streams. This is important as the County and this DEIS (Exhibit 3.1.3.1-1 Watercourse and surface water map) refers to mapped streams and makes no reference to unmapped streams as it does for unmapped wetlands and rare plants. The expanded buffers should apply to all streams, whether mapped or not.	Language on mapped streams will be clarified in the Final EIS.	Letter	2.5
451	Suquamish Tribe	Page 2-14 (re: "Exhibit 2.5.1-1 Major policy revisions of Alternatives 2 and 3"): A legend explaining the abbreviations would be helpful.	A legend explaining abbreviations used here will be added to the Final EIS.	Letter	2.5
452	Suquamish Tribe	Page 2-16 (re: "Increased stream buffers Alt 1 - No Change No Change (50-foot buffers) Alt 2 - No Change (50-foot buffers) Alt 3 Non-Fish increased (100-foot buffers)": Buffers for fish streams should also be included. Otherwise, the impression might be that Type F streams have a 50 foot buffer. As communicated to the County numerous times, the County's current buffers of 50 feet on Type N streams are inadequate, and the 150 buffer on a Type F stream in most cases does not meet the SPTH recommendation to ensure full buffer function.	As previously noted, the contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter	2.5
453	Suquamish Tribe	Page 2-17 (re: "Alternative 2 Tree Replacement Proposal:"): See Annex B	Noted.	Letter	2.5
454	Suquamish Tribe	Page 2-17 (re: "Alternative 3 Tree Retention Proposal:"): See Annex B	Noted.	Letter	2.5
455	Suquamish Tribe	Page 2-22 (re: "Exhibit 2.5.3-5 Housing capacity of alternatives"): The housing capacity of Alternatives 2 and 3 is lower than what it could be due to restrictions on building heights.	Thank you for your comment. Your feedback on the alternatives and proposed development code changes will be forwarded to County decision makers.	Letter	2.5
456	Suquamish Tribe	Page 2-28 (re: "The County is proposing a variety of amendments to development regulations as part of the proposal. Key updates to development regulations are shown in Exhibit 2.5.1-1."): Many of the proposed amendments, such as to the CAO, are unknown.	As previously noted, the contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter	2.5
457	Suquamish Tribe	Page 3-8: To the extent possible, the geological hazard of mass wasting or debris flows runout zones should be mapped.	This mapping is currently not available.	Letter	2.5
458	Suquamish Tribe	Page 3-11 (re: over time but will offer protection of resources through the regulations of the County code, particularly the CAO and SMP. Review procedures will also ensure adequate public health and safety measures are in place.): More apt would be that impacts will be reduced.	Language will be modified to reflect that impacts will be reduced in the Final EIS.	Letter	3.1.1.2
459	Suquamish Tribe	Page 3-11 (re: "expanded areas of impervious surfaces"): Though mentioned later in terms of stormwater and under the alternatives, add "reduced areas for infiltration" as rainfall itself is not stormwater.	Language on reduced areas for infiltration will be added in the Final EIS.	Letter	3.1.1.2
460	Suquamish Tribe	Page 3-12 (re: "Compacted soil, or areas covered by impervious surfaces, allows for less stormwater infiltration into the ground and may cause impacts to groundwater recharge."): This known impact must be quantitatively addressed in terms of how much development alters the volume of water infiltrated over the water year.	Quantitative hydrologic modeling is not scoped in this countywide non-project EIS.	Letter	3.1.1.2
461	Suquamish Tribe	Page 3-13 (re: "Impervious surfaces can reduce the volume of water that infiltrates the soil, which leads to increased runoff and decreased groundwater recharge."): Add "resulting in reduced stream flows".	Language on reduced stream flows will be added to the Final EIS as appropriate.	Letter	3.1.1.2
462	Suquamish Tribe	Page 3-13 (re: "Stormwater controls are intended to maintain stream flows in ranges consistent with native vegetation cover."): The intent of this statement stream flows consistent with native vegetation cover should be clarified. Is it to mean ranges consistent with pre-development conditions, or something else? Additionally, what is meant by range should be stated.	Language on the intent of stream flows being consistent with native vegetation cover will be included in the Final EIS.	Letter	3.1.1.2
463	Suquamish Tribe	Page 3-16 (re: "Kitsap County will encourage building sites to be located away from critical areas, such as steep slopes and landslide hazard areas, by requiring minimum buffer widths and building setbacks in the CAO."): Given the wording in the CAO, the word "require" should be used.	"Require" will be used in place of "encourage" where appropriate. Please note that updates to the CAO are still in progress.	Letter	3.1.1.2
464	Suquamish Tribe	Page 3-16 (re: "Most geologic hazards may be avoided or minimized by locating developments outside of the mapped areas"): Mass wasting runout zones are not mapped.	This mapping is currently not available.	Letter	3.1.1.2
465	Suquamish Tribe	Page 3-16 (re: "KCC Section 19.400.405 of the CAO defines geologically hazardous areas and outlines regulations for development standards for projects in or near the designated hazard areas."): Mass wasting runout zones are not adequately addressed in the CAO.	This mapping is currently not available. The Critical Areas Ordinance update may have more information on this topic.	Letter	3.1.1.2
466	Suquamish Tribe	Page 3-36 (re: "Tree losses projected for the alternatives cannot be wholly avoided given net developable acres in the county. However, regulations to protect and replace significant trees can minimize this unavoidable impact."): This is another example, where the time delay between impact and when mitigation compensates for the impacts, such as replacing significant trees, results in a long term impact. significant trees. See Annex B for more details.	The preferred alternative likely will explore enhanced critical areas requirements and address new critical area buffers, which will increase tree canopy. Kitsap County is also exploring tree retention on land not encumbered by critical areas or their buffers. The EIS was developed with best information available at the time.	Letter	3.1.2.4
467	Suquamish Tribe	Page 3-36 (re: "The flow of water through the landscape is determined by delivery and movement."): A discussion that the flow of water through a stream channel is affected by channel hydraulic complexity - which is often in the short-term a function of wood in the channel and in the long-term the condition of the riparian corridor - and that complexity creates a mosaic of depths and velocity essential to aquatic life is needed.	Additional language describing the hydraulic complexity of flows through a stream channel will be included in the Final EIS as appropriate.	Letter	3.1.3
468	Suquamish Tribe	Page 3-37 (re: "Groundwater also contributes to base flows of streams, provides direct input into lakes,"): In many streams, groundwater maintains base flows and in the absence of groundwater, there is no stream flow.	Noted.	Letter	3.1.3
469	Suquamish Tribe	Page 3-38 (re: "Of those, approximately 322 miles are non-fish bearing waters in the unincorporated county."): This appears to be a continuation of the emphasis in the DEIS on describing the extent of non-fish bearing streams. It would be helpful for the total length of fish bearing streams known to date to be included.	Data on the total known length of fish-bearing streams will be included in the Final EIS.	Letter	3.1.3
470	Suquamish Tribe	Page 3-38 (re: "Likewise, some adjacent watersheds share a common regional aquifer, which contributes significantly to the summer flows of these streams."): This emphasizes the importance of quantify development induced alterations on water infiltration and ana analysis of groundwater flow paths. Additionally, in some cases, the aquifer is the only source of water for summer flows. Furthermore, groundwater can be an impact source of cooler water to the stream channel during the warmer months and provide areas of thermal refugia that will become more important with climate change. The DEIS has not considered thermal refugia, nor is it considered in the current CAO.	Noted. If the County doesn't move any rural changes forward with regard to groundwater, there are no new adverse impacts to be considered in the EIS. When a utility pulls from an aquifer, it needs to be consistent with their individual water system plans, which are required to be consistent with the countywide water system plan. If rural changes are contemplated in the future, supplemental environmental analysis may be needed.	Letter	3.1.3
471	Suquamish Tribe	Page 3-41 (re: "Exhibit 3.1.3.1-2 Existing conditions of the county's Shorelines of the State"): Maps overlaying fish streams and non-fish streams tributary to fish streams with streams on the 303(d) list for temperature, DO, or low flows would be helpful to assess the vulnerability of streams to the proposed zoning changes.	The FEIS will consider all data related to the 303(d) list as available and determine whether it can be accurately cross referenced.	Letter	3.1.3.1

DEIS Public Comment Response Matrix

#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
472	Suquamish Tribe	Page 3-48 (re: "Water Quality 303(d) Listings"): The listing of 303(d) streams should expand to all streams and include maps overlaying fish streams with streams on the 303(d) list for temperature, DO, or low flows. Maps overlaying fish streams and non-fish streams tributary to fish streams with streams on the 303(d) list for temperature, DO, or low flows would be helpful to assess the vulnerability of streams to the proposed zoning changes.	The FEIS will consider all data related to the 303(d) list as available and able to accurately cross referenced.	Letter	3.1.3.1
473	Suquamish Tribe	Page 3-50 (re: "Areas of high impervious surface area coverage can negatively impact the potential for groundwater recharge by routing precipitation into nearby stream channels or stormwater discharge facilities instead of natural infiltration."): This is a qualitative statement recognizing an issue but nothing in the DEIS or the CAO requires a quantification of the impact.	Noted. Hydrologic modeling of impervious surface is not scoped in this EIS.	Letter	3.1.3.1
474	Suquamish Tribe	Page 3-52: There is no discussion of the how important thermal refugia or inputs of cooler water are to salmonids.	County – are cold water refugia scoped?	Letter	3.1.3.2
475	Suquamish Tribe	Page 3-52 (re: "The creation of impervious surface areas and removal of forested areas associated with development activities in all alternatives will influence natural surface water systems (Booth et al. 2002)."): See previous comments about groundwater impacts regarding this wording.	Noted.	Letter	3.1.3.2
476	Suquamish Tribe	Page 3-53 (re: "In areas where land is currently undeveloped, increased impacts may be experienced as engineered surface water systems may not be effective in replicating natural processes or systems."): Engineered systems will not effectively replicating natural systems. Page 52 of the 2019 Ecology Manual (emphasis added) states: "The engineered stormwater conveyance, treatment, and detention systems advocated by this and other stormwater manuals can reduce the impacts from development to water quality and hydrology. However, they cannot replicate the natural hydrologic functions of the natural watershed that existed before development, nor can they remove enough pollutants to replicate the water quality of predevelopment conditions. Ecology understands that despite the application of appropriate practices and technologies identified in this manual, some degradation of urban and suburban receiving waters will continue, and some beneficial uses will continue to be impaired or lost due to new development. This 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 the hydrologic cycle, the cycle of new development followed by beneficial use impairments will continue." Page 122 contains the following statement. The BMPs listed in this section are likely insufficient by themselves to prevent significant hydrologic disruptions and impacts to streams and their natural resources. Therefore, local governments should look for opportunities to change their local development codes to minimize impervious surfaces and retain native vegetation in all development situations. Most importantly, to maintain the beneficial uses of our lowland freshwater systems will require land use planning that targets retention of a majority of a creek's watershed in its natural condition, and retains most of the benefits of headwater areas, , connected wetlands,	Noted.	Letter	3.1.3.2
477	Suquamish Tribe	Page 3-53 (re: "Changes in land use can also lead to declining summer base flows. Stormwater runoff that flows quickly downstream reduces infiltration and allows less runoff to be stored in the soil for summer flows. for summer flows. Without adequate stormwater detention, channels that were formerly resilient may become unstable due to larger and more variable stream flows over time. Reduced summer base flows may result in a loss of flood-carrying capacity, increased stream temperatures, decreased supply of dissolved oxygen, loss of capacity to assimilate and dilute contaminants, loss of aquatic habitat, and creation of seasonal fish passage barriers (EPA 2021)."): Declining baseflows also need to be considered in the context of increased intermittency of seasonal streams in both space and time, and converting perennial streams to seasonal streams. Additionally, potential impacts to cold water refugia (a separate issue from overall stream temperature) must be considered.	The FEIS will consider the stormwater manual and its ability to address these issues.	Letter	3.1.3.2
478	Suquamish Tribe	Page 3-55 (re: "Pumping water from permit exempt wells can reduce groundwater discharge to springs and streams, which in turn has the potential to reduce stream flows (Barlow and Leake, 2012)."): As throughout the DEIS, the issue of groundwater discharge to springs and streams is generally looked at through the lens of reduced groundwater due to consumptive use. However, the impacts of development upon groundwater recharge need to be quantified.	Noted. Groundwater recharge modeling is not scoped in this non-project EIS.	Letter	3.1.3.2
479	Suquamish Tribe	Page 3-58 (re: "Under Alternative 2, an additional 1,458 feet of non-fish bearing streams will be affected by the UGA expansion areas compared to Alternative 1. Additionally, 1,477 feet of non-fish bearing waters will be affected by upzoned areas under this Alternative."): See previous comments re this type of wording.	Noted.	Letter	3.1.3.2
480	Suquamish Tribe	Page 3-58 (re: "Water quality in riparian areas would be expected to decline in those areas where growth is greatest under Alternative 2."): See previous comments re this type of wording.	Noted.	Letter	3.1.3.2
481	Suquamish Tribe	Page 3-58 (re: "Unmapped wetlands may also occur in all areas of proposed UGA expansion under this alternative,"): Unmapped streams, both fish and non-fish may also occur.	Unmapped fish- and non-fish-bearing streams will be added to this sentence in the Final EIS.	Letter	3.1.3.2
482	Suquamish Tribe	Page 3-63 (re: "Additional mitigation measures may be needed to ensure adequate protection of anadromous fish. Potential mitigation measures could include, but are not limited to."): See earlier comments.	Noted.	Letter	3.1.3.3
483	Suquamish Tribe	Page 3-63 (re: "Additional mitigation measures may be needed to ensure ..."): See earlier comments.	Noted.	Letter	3.1.3.4
484	Suquamish Tribe	Page 3-63 (re: "The County's stormwater management requirements would minimize the impacts from new impervious surfaces."): Suggest reduce, not minimize.	"Minimize" will be changed to "reduce" where appropriate in the Final EIS.	Letter	3.1.3.4

DEIS Public Comment Response Matrix

#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
485	Suquamish Tribe	Page 3-63 (re: "However, it should be noted that the 2019 Stormwater Management Manual for Western Washington (SWMMWW) and the 2021 Kitsap County Stormwater Design Manual do not address outside factors, such as area increases in stream flows or rates of erosion."): This is a key point and highlights the need to collect information, such as reduction on annual volume of infiltration, changes to stream hydroperiod at velocities that impacts salmonids, etc. in order to comprehend the impacts and develop mitigation measures. Furthermore, to emphasis the point, suggest a footnote taken from the County Stormwater Manual be added to emphasis to Decision Makers the shortcomings of the Manual: "This manual presents Kitsap County's minimum standards for engineering and design of drainage BMPs. While Kitsap County believes these standards are appropriate for a wide range of project proposals, compliance solely with these requirements does not relieve the professional engineer submitting designs of their responsibility to ensure drainage facilities are engineered to provide adequate protection for natural resources and private property. Compliance with the standards in this manual does not necessarily mitigate all probable and significant environmental impacts to aquatic biota. Fishery resources and other living components of aquatic systems are affected by a complex set of factors. While employing a specific flow control standard may prevent stream channel erosion or instability, other factors affecting fish and other biotic resources (e.g., increases in stream flow velocities) are not directly addressed by this manual. Likewise, some wetlands, including bogs, are adapted to a very constant hydrologic regime. Even the most stringent flow control standard employed by this manual does not prevent all increases in runoff volume, and it is known that increased runoff can adversely affect wetland plant communities by increasing the duration and magnitude of water level fluctuations. Thus, compliance with this manual should not be construed as mitigating all probable and significant stormwater impacts to aquatic biota in streams and wetlands; additional mitigation may be required. Additional mitigation may also be required to compensate for loss of critical drainage area habitat functions associated with activities inside the critical drainage area or critical drainage area buffers."	Thank you for the feedback. Additional mitigation language regarding shortcomings of the stormwater management manual will be added to the Final EIS for consideration by County decision makers.	Letter	3.1.3.4
486	Suquamish Tribe	Page 3-63 (re: "However, some impacts to both surface and ground water resources, including increasing peak flows, channel incision, and reduced groundwater recharge, may be unavoidable as new impervious surfaces are created and vegetation is removed with development activities."): These statement should be expanded to note that if a development increases impervious surface area and the increase in stormwater generated cannot be infiltrated onsite, then an outcome of detention is that though released at a rate that should not create significant erosion in the channel, this greater volume of water is released over a longer period of time altering increasing stream velocities above what they would have been otherwise in the absence of development. This points out another benefit of calculating total pre and post development runoff volume over the water year as it can used to estimate changes in water velocities and duration of flows that might impact aquatic life.	This statement will be expanded and clarified in the Final EIS.	Letter	3.1.3.4
487	Suquamish Tribe	Page 3-63 (re: "It is not possible to eliminate all impacts on surface water resources entirely under any of the alternatives."): It is clearly not possible, unless development is restricted to what can be constructed without increasing the volume of stormwater leaving a site, to prevent alterations in stream flow. However, it is possible to locate outfalls away from areas used by salmonids to shelter from high flows or to increase instream structural complexity as noted elsewhere in this DEIS, an increase that would typically provide a greater volume of water within acceptable velocities.	Additional potential mitigation, including changes to outfall locations and increases in instream structural complexity, will be considered by County decision makers and included in the Final EIS as appropriate.	Letter	3.1.3.4
488	Suquamish Tribe	Page 3-64 (re: "Decline and eventual loss of some wetland functions for hydrology, water quality, and habitat."): The same will occur to streams.	Streams will be included in this sentence in the Final EIS.	Letter	3.1.3.4
489	Suquamish Tribe	Page 3-69 (re: "Water levels are more stable and peak flows are more typical of historic flows"): The presence of historical peak flows should not be assumed to mean the water in the channel behaves the same as historically. Stream hydraulics are function of flow and hydraulic complexity. The focus in stormwater management on reducing peak flows to avoid channel erosion (a geomorphic threshold) has led to a lack of focus on biological thresholds for flows. Water flows (velocities) required to displace aquatic life (such as juvenile salmonids), to increase their energy expenditures to maintain position, or requires holding in positions with an acceptable velocity or generally not considered. In undeveloped channels, due to the hydraulic complexity (often created by wood) water moves through the stream channel much differently than in channels that have been altered by development. The complex mosaic of differing water velocities and depths has been converted to a system with greater uniformity of depth and velocity with fewer area for aquatic life to avoid flows above their swimming thresholds.	Noted.	Letter	3.1.3.4
490	Suquamish Tribe	Page 3-69 (re: "Many structural features typical of historical vegetation, such as snags, dead and downed wood, and brush piles, are often completely removed from the landscape."): The same has and is occurring in streams. Habitat forming wood has been removed from many stream or stream reaches, in the absence of a mature riparian corridor the amount of remnant wood is declining, if there is remnant wood. The lack of hydraulic complexity makes aquatic life more vulnerable to development induced alterations of the hydroperiod.	It will be noted that these types of structural features are also often removed from streams in the FEIS.	Letter	3.1.4
491	Suquamish Tribe	Page 3-70 (re: "stream channels, which has resulted in degraded overall water quality and resulted in alterations to hydrology."): More discussion of the impacts of development, such as reducing stream hydraulic complexity, upon how water moves through streams should be presented.	Additional information about how development impacts hydraulic stream complexity will be discussed in the FEIS, although hydrologic modeling between alternatives is not scoped for this EIS.	Letter	3.1.4
492	Suquamish Tribe	Page 3-70 (re: "Nearshore Estuary Habitats."): A definition for pocket estuary should be provided as well as a map to the location of the larger pocket estuaries. Though incomplete, Kitsap County does have a map of pocket estuaries. https://www.kitsap.gov/dcd/NR_Nearshore_Assessment_Maps/KitsapEast_PocketEstuaries.pdf a Kitsap County Map of pocket estuaries	A definition will be added to the FEIS for "pocket estuary". The County review the referenced map for its applicability.	Letter	3.1.4
493	Suquamish Tribe	Page 3-70 (re: "These diverse nearshore habitats are critical for rearing of anadromous fish, including Chinook salmon,"): Estuaries are particularly important for juvenile chinook, coho and chum as well as forage fish and other marine species	The importance of estuaries for other species will be mentioned as noted in the Final EIS.	Letter	3.1.4
494	Suquamish Tribe	Page 3-73 (re: "USFWS has identified nine federally listed terrestrial wildlife species that are documented to occur or may occur in Kitsap county (USFWS 2022). These aquatic species include Chinook salmon, chum salmon, ..."): The first sentence refers to terrestrial species but the examples given are aquatic. As noted in other communications to the County from the Tribe, the County should be designating species of local concern. Additionally, the County should plan for wildlife corridors.	The language in the Final EIS will be modified to include the terrestrial species as well as the mentioned aquatic ones. Your feedback on designation of species of local concern and the need to plan for wildlife corridors will be forwarded to County decision makers.	Letter	3.1.4
495	Suquamish Tribe	Page 3-74 (re: "Fish habitat is largely dependent on water quality and quantity."): This is an oversimplification. Sufficient amounts of good freshwater water without physical habitat such as wood, properly size sediment, etc., provide little fish habitat. Suggest this sentence be expanded to note the stream habitat arises from the interaction of flow, water, and sediment and changes in the amount or timing of the input of these affects habitats. This would set the stage for the longer following sentence found in this paragraph of the DEIS. Additionally, a discussion of the interaction of wood with water to form complex habitats, particularly pools that can remain wetted during low flows (thus increased resilience to climate change) is warranted. Furthermore, low velocity water created by wood helps shelter aquatic life form peak flows.	This section will be expanded upon to cover physical habitat and the intersection with flow/water/sediment/timing changes in the final EIS.	Letter	3.1.4
496	Suquamish Tribe	Page 3-77 (re: "Estuarine habitat occurs at the stream mouths of Barker, Clear, and Steele Creeks, while areas along Dyes Inlet are considered marine nearshore habitat."): A definition of pocket estuary would helpful as pocket estuaries also occur at the mouths of smaller, unnamed streams; and in tidally influenced wetlands with freshwater input etc.	A definition will be added to the Final EIS for "pocket estuary".	Letter	3.1.4

DEIS Public Comment Response Matrix

#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
497	Suquamish Tribe	Page 3-78 (re: "Critical areas, including streams and wetlands, would receive similar protection under each of the alternatives with some increased protections for riparian areas in Alternative 3."): As the CAO is undergoing revision, the extent of any increased protection, beyond the proposal to increase the buffer for non-fish stream in Alternative 3 from 50 to 100 feet is unknown. However, the DEIS implies and BAS indicates the current county stream buffers are insufficient.	The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter	3.1.4.2
498	Suquamish Tribe	Page 3-78 (re: "However, indirect impacts may also occur with the introduction and establishment of nonnative invasive species."): Other indirect impacts to vegetation includes increased potential for (1) windthrow of trees in the riparian areas; and (2) requests to remove danger trees from the riparian area or stream buffers.	These additional impacts will be added to the Final EIS.	Letter	3.1.4.2
499	Suquamish Tribe	Page 3-79 (re: "Aquatic species may be impacted by loss of habitat due to development or alteration of habitat due to changes in water quality and quantity that may occur under each alternative"): Suggest "may" be switched to "will". Additionally, changes in water quantity are using considered towards the extremes: (1) base flows; and (2) peak flows (erosion and flooding concern). However, also need to consider development induced changes in the frequency and duration of flows less than the design event for developments required to plan for flow duration control or the cumulative impacts from multiple projects that are not subject to flow control, but are unable to infiltrate stormwater.	The County will take a closer look at the use of "may" vs "will" and the Final EIS will reflect this change if appropriate. Your comments on how changes in water quantity are considered are noted and will be forwarded to County decision makers.	Letter	3.1.4.2
500	Suquamish Tribe	Page 3-80 (re: "Reduced quality and quantity of aquatic habitat may occur as a result of future development activities Fish habitat may be impacted by the conversion of land, increased density, changes in types of land use activities, and all alternatives."): Switching "may" to "will" is consistent with wording found in Ecology and Kitsap County stormwater manuals.	"May" will be changed to "will" in the Final EIS.	Letter	3.1.4.2
501	Suquamish Tribe	Page 3-80 (re: "Resulting impacts could include, but are not limited to, increased water temperatures sedimentation, increased peak flows, reduced groundwater recharge, increased shoreline armoring, channelization, and overall reduced riparian and wetland habitats."): Additional impacts include reduced base flows, increased intermittency of seasonal streams in both space and time, and converting perennial streams to seasonal streams. In addition to increased peak flows, there is typically an increase in the frequency of the equivalent of sub-peak flows as well as their duration. Direct impacts to fish, such as displacement or higher energy expenditures due to increased duration of flows at or exceeding the upper end of their swimming ability are an impact.	Additional impacts will be described in the Final EIS.	Letter	3.1.4.2
502	Suquamish Tribe	Page 3-80 (re: "Intact riparian or shoreline buffers may reduce adverse effects of watershedwide development on streams and wetlands."): Though intact riparian or shoreline vegetation buffers are more likely to reduce many adverse effects, this DEIS statement is debatable for impacts that are deliberately conveyed through a buffer to the stream channel, such as some stormwater discharge.	Noted.	Letter	3.1.4.2
503	Suquamish Tribe	Page 3-80 (re: "Established, mature forested buffers allow large woody debris recruitment and support maintaining healthy stream temperatures."): A sentence or two of the importance of instream wood to create hydraulic complexity and the mosaic of water velocities required by salmonids is warranted. This would provide the linkage between the riparian corridor and instream wood.	Additional language on instream wood and hydraulic complexity and its relationship to salmonids will be added to the Final EIS.	Letter	3.1.4.2
504	Suquamish Tribe	Page 3-80 (re: "Salmonid species are particularly sensitive to changes in water quality and temperature, which may affect their ability to survive, grow, and reproduce."): Juvenile and many stream rearing salmonids are also particularly sensitive to changes in water velocities that exceed their preferred range and habitat alterations due to loss of wood from stream channels as well as temperature increases resulting from removal of riparian vegetation.	This sentence will be bolstered with a reference to juvenile salmonids in the Final EIS.	Letter	3.1.4.2
505	Suquamish Tribe	Page 3-80 (re: "Direct impacts on fish habitat will be minimized by regulatory buffer requirements and the"): Suggest reduced is a more appropriate word than minimized.	"Reduced" will replace "minimized" where appropriate in the Final EIS.	Letter	3.1.4.2
506	Suquamish Tribe	Page 3-80 (re: "However, current state and County regulations require stormwater management and treatment standards for projects that create significant new impervious surface area to help minimize detrimental effects on aquatic species and their associated habitats. These regulations are intended to minimize or mitigate impacts on fish habitat but may not eliminate the impact entirely."): Suggest "minimize" be changed to "reduce". Suggest "may not eliminate" be changed to "will note eliminate" for consistency with the Ecology and County stormwater manual. State and county regulations require stormwater analysis look at potential alterations to wetland hydroperiods. No such comparable analysis if required for alteration of hydroperiods in stream channel. Aquatic life, such as overwintering juvenile coho that have not found preferred overwintering habitat, in response to storm induced increases in stream flows often move into small tributaries, often backwatered from the main channel and only containing water during storm events to avoid the higher flows in the main channel. Stormwater discharge into these smaller channels can be a significant portion of the flow and reduce their suitability for high flow refugia. Additionally, these regulations are intended to reduce impacts to the form of the stream channel, such as reducing flows below the erosion threshold. These regulations are not designed to address stormwater induced flow changes upon water velocities within aquatic life swimming abilities, impacts which can occur at much lower velocities than those needed to erode the stream channel.	"Reduced" will replace "minimized" where appropriate in the Final EIS. Your feedback on hydroperiod analysis in stream channels will be forwarded to County decision makers.	Letter	3.1.4.2
507	Suquamish Tribe	Page 3-83 (re: "Unmapped rare plants may occur in all areas of proposed UGA expansion and could be affected by future development activities."): Unmapped streams and wetlands are also expected to be present, particularly small low gradient seasonal streams used for overwintering and high flow refugia and small headwater wetlands.	Unmapped streams and wetlands will be added to this sentence in the Final EIS.	Letter	3.1.4.2
508	Suquamish Tribe	Page 3-84 (re: "The Suquamish Tribe, working alongside Tribal Elders and the Cultural Co-op, have identified and mapped traditional places in and around the Port Madison Indian Reservation."): The Tribe does not just gather information for places only in and around the reservation, but rather for the entire county. There are ethnographic place names and Suquamish villages and camping spots all over Kitsap County, not limited to the reservation boundaries.	This sentence will be modified to reflect the extent of Suquamish Tribe place names in the Final EIS.	Letter	3.1.4.2
509	Suquamish Tribe	Page 3-89 (re: "Additionally, coordination with Washington State Department of Fish and Wildlife and local Tribes is encouraged to ensure protection of treaty reserved natural and cultural resources, where applicable."): Coordination with the Tribe at the earliest possible stage will reduce the potential delays due to (1) redesigning a project after Tribal input has indicated a redesign would avoid sensitive areas; or (2) an inadvertent discovery when there is no plan to deal with discovery..	Thank you for your comment. The County will review its procedures for consulting with Tribes when there are possible impacts to natural and cultural resources. An IDP may be a mitigation measure for individual projects.	Letter	3.2.4.1
510	Suquamish Tribe	Page 3-89 (re: ".....notify Kitsap County, the Office of Archaeology and Historic Preservation and affected Indian tribes."): Please verify the DEIS has the correct title, it might be the Department of Archaeology and Historic Preservation	Thank you, this will be corrected to DAHP in the Final EIS.	Letter	3.2.4.1

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#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
511	Suquamish Tribe	Page 3-85 (re: "The Shoreline Master Program (KCC Title 22), updated in 2021, applies use and modification standards, as well as mitigation sequencing, vegetation conservation, and critical areas regulations to all Shorelines of the State. The updated Shoreline Master Program was adopted to meet the standards of no net loss of shoreline ecological functions. Additionally,"): There is a disconnect between the SMP and SEPA for activities within the Shoreline Management Zone. Buffers in the SMP are typically much less than those found in the CAO, yet No Net Loss (NNL) reports typically evaluate whether a proposal is compliant with the mitigation sequencing requirements of all comprehensively updated SMPs and not, rather than cumulative, short-term, longterm, direct and indirect impacts to the environment outside of the buffer. If an impact is not identified, there will be no directed mitigation for that impact. The wording in the SMA and SMPs allows NNL reports and the equivalent to claim certain activities have no impact, when in fact they do. In effect, NNL reports are being used by some applicants to truncate the area over which impacts are to be considered.	The comment is noted.	Letter	3.1.4.3
512	Washington State DOT	Recent legislation offers pathways for local jurisdictions to streamline housing development approval, including expansion of Categorical Exemptions under the State Environmental Policy Act (SEPA). Some of these pathways include a requirement for local agencies to demonstrate that proposed housing projects are consistent with the Comprehensive Plan and have completed sufficient environmental analysis to, among other things, identify and mitigate impacts to the state highway system. As such, WSDOT is concerned with Kitsap County's stated intention to rely on phased review (DEIS Section 1.2.3.1). With phased review, Kitsap county proposes to defer investigation and mitigation of probable significant adverse environmental impacts from this non-project EIS to a later project-specific environmental review.	The alternatives analysis does include facility-level impacts. A of housing unit / job growth per TAZ for each alternative to the appendix and a table of land use differences will be added to the Final EIS. Site specific analysis is done during project specific SEPA analysis, but countywide analysis is only done on a 10-year Comp Plan cycle.	Letter	1.2.3.1
513	Washington State DOT	WSDOT acknowledges that State statute and administrative code affords the Lead Agency with discretion in establishing the scope and methodology for SEPA environmental reviews. However, WSDOT believes that the recent housing legislation signaled legislative intent for more robust SEPA analysis to occur during development of Comprehensive Plan updates. If Kitsap County retains the phased review process, WSDOT would view the DEIS' non-project analysis as being insufficient to meeting the "environmental analysis" requirements for SEPA Categorical Exemptions (RCW 43.21C.229(3)(b)).	The comment is noted and forwarded to County decision makers.	Letter	1.2.3.1
514	Washington State DOT	Given the legislative intent, WSDOT recommends that Kitsap County amend and expand the EIS' transportation analysis to be consistent with the level of detail typically applied for project-level actions. WSDOT believes that such detail is feasible given that the study boundaries and land use classifications make it possible to develop reasonable assumptions regarding the development intensity throughout the county. At a minimum, WSDOT would expect such a project-level analysis to meet the following characteristics for use in subsequent Categorical Exemptions or middle housing streamlining actions: •Facility-level impact analysis of all alternatives to ensure acceptable level of serviceof state facilities. •Thorough documentation of assumptions, including, but not limited to, the assumedspatial allocation of residential dwelling units throughout the county) •An appropriate monitoring system to trigger a re-analysis if actual developmentmaterially differs from the assumptions. These steps would address WSDOT's concern about potential impacts to state facilities if actual development patterns differ in intensity or spatial patterns from what is assumed in the DEIS.	The concurrency ordinance is applicable to the new Comp Plan upon adoption. Therefore our analysis is based on the KCC 20.04 relationship to the new comp plan. The project list also identifies project specific improvements to meet LOS standard on each facility across the county, despite not hitting the 15% concurrency threshold.	Letter	1.2.3.1
515	Washington State DOT	Local Roadway Level of Service Standards DEIS Exhibit 3.2.6.1-4 defines the level of service (LOS) standards and SEPA significance criteria used to identify the significant environmental impacts to county roadways. The DEIS uses an area-based approach that allows the LOS 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.	This analysis was completed and included in the appendix of the original EIS submission. It will also be included in the final EIS.	Letter	3.2.6.1
516	Washington State DOT	The DEIS and Capital Facilities Plan cite Kitsap County Concurrency Ordinance 20.04 as the applicable regulation authorizing use of the area-based approach in the DEIS for the Comprehensive Plan Update. However, the Capital Facilities Plan (Level of Service, Page 110) states "the 15 percent allowance relates to individual development proposals undergoing a concurrency test." The DEIS (Page 3-124) further states: "The Kitsap County Concurrency Ordinance, codified in KCC 20.04, establishes a process for testing whether a development project meets concurrency." WSDOT notes that while Ordinance 20.04 may authorize use of the area-based approach for project-level concurrency determinations after the Comprehensive Plan update has been adopted, the Ordinance does not authorize this approach as a SEPA significance criteria for the actual Comprehensive Plan update. WSDOT believes that the area-based approach, which allows exceedance of the county's adopted LOS standards as shown DEIS Exhibit 3.2.6.1-4, is inconsistent with RCW 36.70A.070(6)(a)(iii)(d), which requires mitigating impacts to "transportation facilities or services that are below an established multimodal level of service standard."	Comment noted.	Letter	3.2.6.1
517	Washington State DOT	WSDOT requests that the DEIS transportation analysis be revised using proper application of the county roadway LOS standards shown in DEIS Exhibit 3.2.6.1-4. The revised analysis should identify the specific county roadway segments for each alternative that are forecast to exceed the LOS standard. The analysis should also propose funded mitigations for each significant impact plus any residual impact to the state highway system from these county roadway impacts and mitigations.	Appendix C lists deficient roadway segments and mitigation measures by alternative. This list could be moved to the body of the EIS document for analysis of the preferred alternative. Funding is identified for the 6-year and 20-year projects in the Capital Facilities Plan. Projected LOS deficiencies on state highways will be added to the FEIS.	Letter	3.2.6.1
518	Washington State DOT	Project Funding For mitigations to significant impacts on the state highway system, WSDOT requests a written acknowledgment of shared responsibility as it pertains to funding when local growth adds traffic volume and impacts on state system. WSDOT asks that this shared role be acknowledged and reflected in the budgeting process.	The comment is noted and forwarded to County decision makers.	Letter	3.2.6.3
519	WDFW	WDFW evaluated the three alternatives outlined in the County's DEIS but cannot fully endorse any one of them based on their current form. The alternatives fallshort of WDFW's management recommendations due to the lack of environmental protection outlined within each of them. WDFW recognizes that, by necessity, all alternatives outlined result in increased urbanization of the county likely leading to adverse impacts on habitats and ecosystems that humans and wildlife depend on to varying extents. Below we capture the highlights and disadvantages of each alternative from our perspective. In our recommendations section, we emphasize where we see room for further improvement to these alternatives to increase the long-term resilience of the county's riparian ecosystems and their extensive co-benefits.	Noted.	Letter	2.5

DEIS Public Comment Response Matrix

#	Author Name	Comment, Letter, or Letter Title	Response	Source	Applicable EIS Section
520	WDFW	<p>Alternative 1, “No Action”</p> <p>Alternative 1 does not offer any extra environmental safeguards beyond the present levels. These protective measures currently fall short of WDFW's management recommendations that are based on the best available scientific evidence and the goals of GMA during this periodic update. Due to these factors, WDFW requests that the county not pursue Alternative 1.</p>	Thank you for your feedback. Your comments on Alternative 1 will be forwarded to County decision makers.	Letter	2.5
521	WDFW	<p>Alternative 2, “Compact Growth/Urban Center Focus”</p> <p>WDFW prefers the objectives outlined in Alternative 2 out of the three proposed alternatives but acknowledges that even this alternative falls short of fully meeting the agency's recommendations. The compact growth focus of this alternative promotes infill, limits urban growth area (UGA) expansions to 464 acres, and affects the least amount of non-fish bearing streams out of the three alternatives. WDFW also recognizes that this alternative would enable Kitsap County to achieve the 2044 housing goals while falling just short of the expected employment rate provided by the Department of Commerce but reaches towards VISION 2050 targets closer than the other alternatives. WDFW highlights that this alternative focuses on the urban growth in areas of Silverdale and Kingston while limiting the UGA expansion of Bremerton, Port Orchard, and Poulsbo. The tree replacement rates for urban residential areas are reasonable to reestablish green spaces and shade as those trees mature.</p> <p>Even with the notable aspects above, we have concerns with this alternative due to the expected impact on 1,477 linear feet of non-fish bearing streams, no expansion of stream buffer widths, and the increase in fragmented habitat.</p>	Thank you for your feedback. Your comments on Alternative 2 will be forwarded to County decision makers.	Letter	2.5
522	WDFW	<p>Alternative 3, “Dispersed Growth Focus”</p> <p>Alternative 3 is the only option that proposes expanding the riparian buffer widths from 50 feet to 100 feet for non-fish bearing streams and imposing tree retention requirements for development. Although these steps are closer to WDFW management recommendations than the other alternatives in this DEIS, the expected expansion of UGAs by 1,049 acres and impacts to non-fish bearing streams by 17,936 feet is a significant concern. Therefore, we do not recommend that Kitsap County pursue this alternative.</p>	Thank you for your feedback. Your comments on Alternative 3 will be forwarded to County decision makers.	Letter	2.5
523	WDFW	<p>WDFW Recommendations:</p> <p>WDFW is recommending Kitsap County explore a hybrid alternative between Alternatives 2 and 3. This would help increase environmental protections as stated in these options while fulfilling the overarching GMA goals outlined during this update process. This suggested hybrid alternative would include:</p> <ul style="list-style-type: none"> • All features of Alternative 2 including but not limited to focused infill, limited UGA expansions, limited impacts to non-fish bearing streams, and tree replacement rates • Features from Alternative 3: <ul style="list-style-type: none"> o Adding an increased stream buffer width from 50 feet to 100 feet (minimum) for non-fish bearing streams o Tree retention rates for urban areas <p>These increased environmental protections may still fall short of WDFW's full management recommendations, but it would be an overall increased benefit from the current protections in place.</p>	Thank you for your feedback. Your comments on a blend of alternatives will be forwarded to County decision makers.	Letter	2.5
524	WDFW	<p>Our agency requests that Kitsap consider using low-impact development and green infrastructure during infill development to promote better air and water quality, stormwater management, climate adaptation measures, and limited impervious surfaces during development. Although not required until 2029 for Kitsap County, WDFW supports early adoption of the climate change goals and action plans outlined by the Department of Commerce.</p>	Your comment on the Climate Element is noted. County decision makers will consider adding LID and green infrastructure requirements to the preferred alternative.	Letter	Multiple
525	WDFW	<p>WDFW's management recommendation for full riparian function can be achieved using the Site Potential Tree Height at age 200 (SPTH200). We urge Kitsap County to consider adopting this method for delineating riparian management zones to prevent any further loss of functions and values in these ecologically important and vulnerable priority habitats. This approach can also help to increase water and air quality, which were noted as concerns across all alternatives outlined in the Kitsap DEIS along with promoting habitat connectivity corridors and open spaces.</p>	The contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, are likely to be more protective of environmental resources and reduce impacts.	Letter	Multiple
526	WDFW	<p>WDFW underscores that counties and cities shall include the best available science in developing policies and development regulations (RCW 36.70A.172). Our riparian resources, including but not limited to the Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications, Volume 2: Management Recommendations, and the SPTH200 GIS mapping tool, are based on current best available science. We encourage Kitsap County to follow these recommendations more closely as the county continues to develop and revise its DEIS alternatives, Comprehensive Plan, and Critical Areas Ordinance. When departures from the best available science are made in policies and development regulations, scientifically based, reasoned justifications must be provided in the record (WAC 365-195-915(1)(c)). Adaptive management programs, such as the Kitsap Natural Resource Asset Management Program, should be followed when departures from the best available science occur as outlined in WAC 365-195-920 (1)(b).</p>	As noted above, the contents of the DEIS are conservative with regard to protection of critical areas. Changes to the CAO, which are still under development, will address Best Available Science and are likely to be more protective of environmental resources and reduce impacts than current code.	Letter	Multiple