

# Year of the Rural Comments Summary

Comments Submitted September 2 – September 23, 2025

Response to the following deliverables published on September 2, 2025:

- DRAFT Rural and Resource Lands Chapter
- DRAFT Reclassification Request Staff Report
- DRAFT Proposed Code Updates
  - Agriculture
  - Child Care
  - Equestrian Facility

Prepared by Department of Community Development – Long Range Planning Division  
October 7, 2025.

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## Year of the Rural – Rural

### Summary

A total of 14 written comments were received during the YOTR public comment period that addressed topics outside the primary theme areas of agriculture, environment, and rural policy. These comments raised a variety of procedural, interpretive, and administrative considerations regarding the draft code. They reflected the perspectives of stakeholders seeking clarity, coordination, and effective implementation across multiple sections of the County's development regulations.

Many respondents focused on ensuring that the proposed code is easy to understand, consistently applied, and compatible with existing County procedures. Several emphasized the importance of public communication and clear definitions to avoid confusion in code interpretation and enforcement. Others offered suggestions for refining administrative processes, aligning policies across departments, and improving transparency in decision-making.

Overall, the feedback demonstrated broad interest in improving usability, coordination, and accessibility of the County's development regulations.

### General or Other

Count: 9 | 64% of total comments

A small number of comments did not fit neatly within other thematic categories but still offered valuable perspective. These observations often addressed the overall tone, accessibility, or effectiveness of the County's planning and code update process. Respondents emphasized the importance of fairness, responsiveness, and ongoing communication between staff and community members.

These broader remarks underscored the public's interest in a planning system that is approachable and accountable. While less specific than other comments, they help illustrate the community's expectations for continued transparency, thoughtful implementation, and sustained public engagement throughout future County initiatives.

### Code Clarity and Implementation

Count: 3 | 21% of total comments

Several respondents emphasized the importance of clear, concise language in the draft code. They noted that complex or ambiguous terms can lead to inconsistent interpretation

and enforcement. Comments suggested improving definitions, cross-references, and formatting to make the code easier for the public to navigate.

Respondents also discussed the need for clear guidance materials and staff training to support effective implementation. They recommended that the County provide explanatory resources such as flowcharts or summary sheets to help property owners and applicants understand how the code applies in practice.

## Land Use and Development Standards

Count: 3 | 21% of total comments

Several respondents discussed development standards and their relationship to broader land use goals. Comments emphasized that clear, predictable standards are necessary to support both economic development and environmental stewardship.

Respondents recommended streamlining review processes while maintaining safeguards that ensure new development aligns with County policies and community expectations.

## Environmental and Resource Protection

Count: 2 | 14% of total comments

Some comments addressed environmental protection within the context of broader code implementation. Respondents noted the importance of integrating sustainability and resource conservation throughout County planning processes.

They encouraged the County to strengthen cross-references between environmental standards and land use provisions, ensuring consistent application of environmental protections during permit review and enforcement.

## General Observations

Count: 2 | 14% of total comments

A few comments offered general reflections on the draft code and its presentation. Respondents expressed appreciation for the County's efforts to modernize its regulations but encouraged continued review for clarity and usability.

These broad observations underscored the importance of maintaining a well-organized and accessible code that reflects both technical accuracy and public understanding.

## Rural and Resource Lands Chapter

### Summary

A total of 6 comments were submitted on the Year of the Rural chapter, as a whole. The responses reveal consistent support for protecting rural areas from sprawl, strengthening environmental safeguards, and ensuring meaningful representation in advisory councils. Commenters emphasized that rural character, natural resources, and habitat corridors must remain central to the Comprehensive Plan. Several urged the County to move beyond monitoring toward stronger enforcement and accountability measures.

The most recurring theme was environmental protection and forestry practices, with strong objections to clearcutting and calls for use of best available science. Others highlighted the importance of directing growth to UGAs and limiting dispersed rural development. Advisory councils and equity in representation surfaced as key governance concerns, with requests to broaden membership and ensure agriculture and equestrian communities are included. In summary, the comments reflect a strong emphasis on environmental stewardship, anti-sprawl growth management, and fair governance structures

### Environmental Protection & Forestry

Count: 4 | 67% of total comments

The most frequent theme involved protection of natural systems, critical areas, wildlife corridors, and forestry practices. Multiple comments objected to continued clearcutting and urged reliance on “best available science” rather than industry standards. Calls were made for longer timber rotations, stronger habitat connectivity, and prioritization of environmental safeguards above other rural goals.

### Support for UGA Growth / Anti-Sprawl

Count: 3 | 50% of total comments

Several commenters strongly supported the guiding principle of concentrating housing in UGAs and preventing rural sprawl. They emphasized that this approach protects rural character, sustains agricultural and resource lands, and aligns with the intent of the Comprehensive Plan.

### Accountability & Enforcement

Count: 2 | 33% of total comments

Respondents emphasized that “monitoring” alone is insufficient. They called for clear enforcement mechanisms, defined corrective actions, and stronger oversight of rural development and businesses to ensure compliance with environmental and growth management goals.

### Advisory Councils & Representation

Count: 2 | 33% of total comments

Comments stressed the need for Forestry and Agriculture Advisory Councils to include community members, ensuring transparency and balanced representation. One submission proposed creation of an Equestrian Advisory Council to provide broader input into land use decisions.

## Rural Business & Services

Count: 2 | 33% of total comments

Some respondents supported attention to rural business opportunities, but emphasized the need for monitoring, innovation, and strict adherence to the Critical Areas Ordinance. Expanded attention to rural walkability and bikeability was also encouraged.

## Equity & Representation

Count: 1 | 17% of total comments

A concern was raised about whether agricultural community recommendations had been incorporated. This comment suggested delaying code updates until advisory councils are properly established to ensure fairness and inclusivity in policy-making.

## GMA Framework / Local Control

Count: 1 | 17% of total comments

One comment highlighted the inherent tension between state-mandated Growth Management Act requirements and local control. While recognizing the GMA framework, it questioned whether County code updates should proceed before full community and advisory council input is secured.

## ADU

### Summary

One comment was received on Accessory Dwelling Units (ADUs). The commenter expresses concern that Kitsap County's current ADU regulations are overly restrictive for large rural parcels. The County presently limits ADU size to 900 square feet and allows only one ADU per property. According to the commenter, this creates barriers for families with larger acreages who wish to provide housing opportunities for younger family members. The commenter requests a size increase to 1,500 square feet and permission to build multiple ADUs on large parcels, arguing this would help address the local housing crisis. The commenter also notes that cities permit larger ADUs and multiple units on smaller lots, and questions why the same flexibility is not available to rural property owners.

### Key Issues Raised – View 1

- Size limitation of 900 sq. ft. per ADU is viewed as inadequate for families with 4 or more members.
- Only one ADU per property is allowed, even on large acreage parcels.
- The commenter seeks a realistic ADU size limit of approximately 1,500 sq. ft.

- The commenter requests consideration of multiple ADUs for large rural lots.
- Perceived inequity: Cities allow larger ADUs and multiple units on smaller lots, but rural owners with large parcels do not have that option.
- Broader concern: Restrictive ADU standards may be limiting opportunities to address the regional housing shortage.

The comment highlights potential tensions between growth management policies, rural land use restrictions, and housing affordability objectives. The comparison to urban jurisdictions underscores public perception of unequal treatment between city and county residents.

## Key Issues Raised – View 2

- Concern that ADUs and middle housing should be limited to urban growth areas or LAMIRDs, and not allowed in rural areas.

The Tribe's comments highlight potential conflicts between rural housing expansion and environmental protection. Their position emphasizes restricting ADUs and middle housing to designated growth areas, aligning with the Growth Management Act's intent to preserve rural character.

## Environment

### Summary

A total of 6 public comments were received on environmental issues. Participants expressed a broad range of environmental, regulatory, and operational concerns. The comments reflected strong engagement on issues of resource protection, permitting clarity, and practical implementation. Overall, the tone of feedback emphasized the importance of protecting water quality, habitat, and rural character while ensuring that requirements remain clear, feasible, and proportional for landowners and small agricultural operations. A significant portion of feedback related to the permitting process—calling for clarity, consistency, and educational support before enforcement. Concerns about equity and viability for small farms were woven throughout, underscoring the need for scalable requirements and technical assistance to achieve compliance without undue financial strain.

### General Support

Count: 2 | 33% of total comments

A number of respondents expressed general support for environmental regulations that protect water, habitat, and community health. They emphasized the importance of thoughtful implementation that achieves environmental goals without unnecessary complexity.

### General Opposition

Count: 1 | 17% of total comments

Opposing comments focused on regulatory burden, perceived duplication of state and county requirements, and potential cost implications. Some participants questioned whether proposed measures were proportionate to the scale of local environmental impacts.

## Soils / Erosion / Slope

Count: 3 | 50% of total comments

Comments highlighted erosion prevention and slope stability as critical elements of responsible site management. Respondents favored clear standards for temporary and permanent erosion control, particularly during construction or grading activities.

## Air / Odor / Dust

Count: 2 | 33% of total comments

Air quality, odor, and dust control were noted as quality-of-life issues in rural areas. Respondents suggested practical mitigation methods such as vegetative buffers, dust suppression, and site design that minimizes off-site impacts.

## Forestry / Trees / Vegetation

Count: 2 | 33% of total comments

Respondents valued the preservation of existing tree canopy and vegetation. Concerns included clearing limits, replanting expectations, and management of invasive species within buffer zones.

## Wildlife / Habitat

Count: 1 | 17% of total comments

Feedback concerning wildlife and habitat focused on preserving ecological corridors and minimizing disturbance to sensitive species. Commenters supported measures that align with critical area protections and emphasized habitat connectivity as a guiding principle for environmental management.

## Traffic / Access / Safety

Count: 1 | 17% of total comments

Traffic and safety were recurring themes, particularly where larger events or agricultural activities may draw visitors. Respondents requested evaluation of access points, visibility, and parking capacity to ensure safety and minimize disruption to neighbors.

## Climate / Energy / GHG

Count: 1 | 17% of total comments

Comments within this theme referenced climate change, wildfire resilience, and opportunities for energy efficiency. Participants noted the importance of reducing emissions and increasing adaptive capacity through vegetation management and resource conservation.



## LAMIRD

### Summary

One written comment was received during the public comment period addressing Limited Areas of More Intensive Rural Development (LAMIRDs). The comment expressed interest in how rural development is defined and managed, particularly in maintaining visual consistency with the surrounding landscape. It emphasized the importance of preserving rural character while allowing limited, context-appropriate growth.

The respondent encouraged clearer alignment between the Kitsap County Code and Comprehensive Plan policies and suggested stronger design and screening standards. Overall, the comment reflected support for maintaining the distinct identity of rural areas while ensuring that new development within LAMIRDs complements existing character and scale.

### Rural Character and Visual Compatibility

The comment focused heavily on preserving rural character. It emphasized that new development should visually blend with the surrounding landscape through appropriate scale, materials, and site design. The respondent highlighted the importance of retaining trees, minimizing building massing, and maintaining the traditional appearance of rural settings.

### LAMIRD Boundaries and Edge Conditions

The commenter expressed concern about the clarity and permanence of LAMIRD boundaries. They noted that maintaining distinct, well-defined edges is essential to preventing encroachment into adjacent rural or resource lands. Vegetated buffers and visible transitions were recommended to preserve the distinction between developed areas and rural surroundings.

### Design Standards and Screening Requirements

The comment supported stronger design and screening requirements within LAMIRDs. It proposed that setbacks, tree retention, and landscape buffers be applied consistently to reduce visual impacts and enhance compatibility with the surrounding area. The respondent viewed these measures as necessary to preserve rural views and ensure visually cohesive development.

### Employment and Commercial Uses

The respondent acknowledged the value of small-scale employment and service uses within LAMIRDs but cautioned against larger commercial activities that could alter rural character. The comment emphasized the need for clear thresholds distinguishing acceptable rural-compatible uses from those that may appear urban or industrial in nature.

### Code Consistency and Comprehensive Plan Alignment

The commenter encouraged closer alignment between County code provisions and Comprehensive Plan policies related to LAMIRDs. They expressed concern that recent development approvals may

not fully reflect the intent to limit intensity and maintain compatibility with rural surroundings. The comment recommended clear, enforceable standards to ensure consistent implementation of policy objectives.

## Reclassification Requests

### Summary

A total of 7 comments were received during the public review period for Kitsap County's proposed reclassification requests. The comments reveal both site-specific and system-wide concerns, including environmental protection, land use compatibility, compliance history, and adherence to Growth Management Act standards.

### General or Non-Specific Comments

Count: 1 | 14.3% of total comments

The general comment received did not reference a particular application but focused on the overall reclassification process. This respondent raised concerns about transparency, consistency of criteria, and the County's approach to rural and agricultural lands. Several emphasized the importance of maintaining public trust and ensuring that the process aligns with the Comprehensive Plan and Growth Management Act. Additionally, the respondent questioned whether the County is adequately balancing land use flexibility with conservation of resource lands and environmental quality.

### Stokes/Campbell

Count: 3 | 42.9% of total comments

Comments on the Stokes/Campbell proposal primarily objected to the requested rezone from Rural Protection to Rural Commercial. Objections cited the site's environmental constraints, including proximity to Burley Creek, mapped wetlands, and habitat corridors. Respondents emphasized the ecological importance of the Burley watershed and expressed concern that commercial development would fragment wildlife habitat and degrade water quality. Comments also referenced prior County denials for similar requests, arguing that circumstances have not changed and that approval would be inconsistent with past decisions. Overall, the comments reflected strong opposition based on environmental and policy consistency grounds.

### Moran

Count: 2 | 28.6% of total comments

Comments referring to the Moran application focused heavily on code compliance and land use compatibility. Respondents cited reports of past or ongoing violations and questioned whether reclassification from Rural Residential to Rural Industrial would reward non-compliant behavior. The comments also emphasized the presence of wetlands, erosion hazards, and other critical areas

that make the property unsuitable for industrial uses. Several also referenced the Growth Management Act's agricultural conservation objectives, arguing that approval would conflict with these mandates. Overall, the comments showed a strong preference for maintaining the existing designation and ensuring that compliance issues are resolved before any rezone is considered.

## Skrobut-McCormick

Count: 1 | 14.3% of total comments

The comment about the Skrobut-McCormick Lands Co. application addressed both site conditions and policy consistency. The respondent noted the parcel's proximity to Coulter Creek Heritage Park and other rural and forested areas, raising concerns about potential impacts on nearby recreation, habitat, and rural character. The comment emphasized that the property is already developed with several structures and questioned whether further intensification is appropriate. Additionally, there was concern that staff analysis did not demonstrate an unmet need for additional rural commercial or industrial land.

# Proposed Code Updates

## Agriculture

### Summary

A total of 37 written comments were received during the YOTR public comment period addressing agricultural-related provisions of the draft code. Respondents included farmers, rural property owners, and residents concerned with preserving agricultural land, supporting farm viability, and maintaining consistency with County and state policies. Overall, the feedback demonstrated strong community investment in sustaining local agriculture as both an economic and cultural foundation of rural Kitsap County.

Many commenters supported the County's recognition of agriculture as a key land use and advocated for more flexible standards that protect small farms from unnecessary regulatory burden. Several comments addressed the need to align land use regulations with the realities of modern small-scale farming and to ensure that zoning designations promote continued agricultural activity. Concerns were also expressed about infrastructure limitations, water access, and the importance of maintaining environmental stewardship alongside agricultural production.

The comments reflect broad consensus that Kitsap County should continue to refine its regulatory framework to support working farms, promote local food systems, and safeguard agricultural lands for future generations. Respondents consistently encouraged practical, coordinated implementation of agricultural policies that strengthen both economic sustainability and environmental responsibility.

## Regulatory Consistency and Implementation

Count: 27 | 73% of total comments

Many respondents stressed the importance of regulatory consistency and clear implementation guidance. They noted that multiple layers of state and county policies can create confusion, particularly when agricultural activities are defined differently across jurisdictions. Comments urged the County to align definitions and standards with state law, including the Growth Management Act and relevant RCW provisions addressing agricultural practices.

Participants expressed a desire for predictable, transparent processes that reduce administrative burdens. They recommended consolidating overlapping provisions, improving coordination between departments, and ensuring that agricultural operators receive clear communication about applicable requirements. Consistency in policy implementation was viewed as fundamental to building trust and promoting long-term compliance within the farming community.

## Agricultural Viability and Economic Sustainability

Count: 25 | 68% of total comments

Many comments emphasized the importance of supporting the long-term viability of local agriculture. Respondents expressed concern that increasing costs, regulatory uncertainty, and limited access to markets are threatening the sustainability of small and mid-sized farms. They urged the County to ensure that policies are designed to strengthen farm operations and reduce barriers to continued agricultural use.

Commenters encouraged expanding support for value-added production, local distribution networks, and agri-tourism opportunities that help farmers remain economically competitive. Several respondents recommended programs that enhance marketing capacity and infrastructure investment for farm-to-market systems. There was strong agreement that a viable agricultural economy depends on regulatory stability, technical assistance, and incentives that reward good stewardship.

## Land Use and Zoning

Count: 23 | 62% of total comments

Land use and zoning were central concerns for many respondents. Several noted that zoning classifications and parcel size standards should be carefully calibrated to protect productive farmland while allowing continued agricultural use on smaller properties. Comments frequently referenced the need for consistency between zoning designations, Comprehensive Plan policies, and the Agricultural Resource Lands (ARL) mapping process.

Respondents emphasized that agricultural viability depends on access to sufficient land and clear regulatory definitions. They cautioned that excessive fragmentation, inconsistent setbacks, or overly broad non-agricultural allowances could erode the rural landscape. The comments

supported a zoning approach that maintains flexibility for active farms while discouraging conversions that undermine long-term agricultural preservation goals.

## Environmental Protection and Stewardship

Count: 13 | 35% of total comments

Environmental protection and stewardship were recurring themes throughout the feedback. Respondents acknowledged the need to balance agricultural production with environmental responsibility and supported continued use of best management practices for soil, water, and habitat conservation. Several commenters emphasized that voluntary programs and education are often more effective than new prescriptive regulations.

The feedback reflected a shared understanding that sustainable farming and environmental health are interdependent. Respondents encouraged the County to continue collaborating with conservation districts to promote practices that reduce erosion, manage runoff, and protect sensitive areas without imposing unnecessary costs on farmers.

## Infrastructure and Water Access

Count: 13 | 35% of total comments

Several respondents identified infrastructure and water access as persistent challenges for agricultural producers. Comments noted that reliable irrigation and farm access roads are essential for maintaining productivity, particularly during dry seasons. Some expressed concern that water rights limitations and drainage issues can reduce operational capacity and limit expansion opportunities.

Participants encouraged the County to explore partnerships with conservation districts and state agencies to improve water management infrastructure and provide guidance on efficient irrigation systems. They also supported efforts to coordinate land use regulations with water resource planning, ensuring that agricultural needs are incorporated into long-term infrastructure investment strategies.

## Child Care

### Comment Summary

A total of three comments were received regarding childcare. Collectively, these comments highlight strong support for expanding childcare access in the community. The respondents expressed concerns about code provisions related to operating hours and facility siting, and recommendations for updating terminology to align with current DCYF and RCW standards.

## Key Issues Raised

### *Support for Childcare Expansion*

One comment emphasized strong community need for more quality childcare opportunities, expressing support for the proposed childcare plan. This reflects general public support for expanding availability and maintaining policy focus on childcare access.

### *Operating Hours and Outdoor Noise Standards*

Concerns were raised about the mismatch between allowable outdoor noise hours (currently 9:00 a.m. – 7:00 p.m.) and the actual operating schedules of most childcare facilities (6:00 a.m. – 6:00 p.m.). It was recommended that the code be revised to permit outdoor activity from 7:00 a.m. – 7:00 p.m. This would better align regulatory standards with the realities of childcare operations and family needs.

### *Terminology and Alignment with State Standards*

A recommendation was made to update terminology in the childcare code. The phrase “Family Day Care” was described as outdated and potentially misleading, as it implies a lower level of provider education and quality. Alternatives proposed include “Family Child Care” or “Family home early learning program,” consistent with DCYF licensing language and RCW 43.216.010. Updating terminology would bring the County code into alignment with state standards and professional practice.

### *Broader Land Use Considerations*

One comment also addressed related land use issues. Recommendations included revising code allowances for horse facilities to extend operating hours until 10:00 p.m. to accommodate working families and providing feedback on reclassification requests. Some conversions (RW to RC/RI, RR to RI with screening) were supported, while others (RP to RC at Mullenix Road) were opposed due to environmental concerns.

## Equestrian Facility Code - Quantitative

### Summary

A total of 37 written comments were received during the YOTR public comment period addressing equine-related provisions of the draft code. Feedback was broad and detailed, reflecting both enthusiasm and concern from equestrian community members, rural residents, and agricultural property owners. Many respondents emphasized the need to balance environmental protection with the economic and cultural importance of equine activities across rural Kitsap County.

Overall, commenters strongly supported recognition of equestrian uses as an integral part of the county’s agricultural landscape and rural lifestyle. They expressed appreciation for the County’s effort to update definitions and clarify permitting pathways but asked for

greater clarity to ensure the regulations remain practical for a wide variety of properties. Concerns focused primarily on the potential for new standards to unintentionally restrict small family operations or increase costs for property owners.

Environmental protection, manure management, and rural compatibility were recurring themes, with many respondents calling for flexible, size-sensitive standards. Commenters also highlighted the importance of aligning County regulations with state laws and agricultural best management practices. The overall tone of feedback suggested a collaborative desire to ensure that Kitsap’s equestrian community continues to thrive within a clear and balanced regulatory framework.

## Rural Character and Compatibility

Count: 26 | 70% of total comments

Comments consistently affirmed that horses and equine activities are fundamental to Kitsap County’s rural identity. Respondents described equestrian uses as both culturally significant and environmentally compatible, serving as a bridge between agricultural heritage and contemporary rural living. Many emphasized that maintaining open space, pastures, and trails associated with equestrian properties contributes to the scenic and ecological character of rural areas.

There was also strong agreement that new development regulations should protect rural qualities without discouraging equine participation. Respondents encouraged the County to ensure that zoning and performance standards reflect the unique characteristics of rural land use—supporting small-scale barns, hobby farms, and community-level equine activities while limiting large-scale or urbanized intensities inconsistent with the countryside setting.

## Equine Facilities and Operations

Count: 32 | 86% of total comments

A major focus of the feedback concerned how equine facilities are defined and classified. Respondents sought clearer distinctions between private stables, small boarding operations, and larger commercial or training enterprises. Many participants expressed concern that ambiguous thresholds could inadvertently reclassify personal barns as commercial facilities, triggering additional permitting and compliance burdens.

Several commenters recommended adopting a tiered approach that scales requirements based on facility size, number of horses, and operational intensity. They also encouraged

clearer guidance on permitted accessory uses such as arenas, training spaces, and equestrian events. There was a general consensus that the County’s regulatory framework should remain flexible enough to accommodate the full range of equine uses—from individual recreation to small business operations—without imposing unnecessary administrative barriers.

## Manure and Waste Management

Count: 20 | 54% of total comments

Manure and waste management emerged as one of the most frequently discussed topics. Many respondents recognized the importance of responsible waste handling to protect water quality, reduce odor, and maintain neighbor relations. However, they cautioned that overly prescriptive standards could create significant costs for small property owners or discourage continued equine activity.

Several commenters proposed an educational and incentive-based approach, using technical assistance through conservation districts and cooperative programs to promote best practices. They recommended focusing regulatory requirements on larger commercial operations while providing flexibility for smaller or low-intensity uses. Overall, there was widespread agreement that manure management policies should balance environmental goals with practical implementation for the diverse scale of equine facilities in Kitsap County.

## Agricultural and Small Farm Viability

Count: 27 | 73% of total comments

Respondents repeatedly linked equine activities to the broader sustainability of small farms and rural economies. They emphasized that horses contribute to the agricultural landscape not only through direct operations but also by maintaining open land, supporting local feed suppliers, and preserving the rural economy. Concerns were raised that overly complex or costly permitting requirements could discourage continued investment in equine infrastructure.

Commenters encouraged the County to recognize equestrian operations as legitimate agricultural uses deserving of policy support comparable to crop or livestock farming. They recommended that any new standards or performance measures explicitly account for the needs of small and family-run operations, ensuring that regulations do not inadvertently drive equine uses out of rural zones.



## Regulatory Consistency

Count: 31 | 84% of total comments

Several respondents noted the importance of aligning equine-related code provisions with existing Kitsap County Comprehensive Plan policies and state regulations. They requested clear cross-references to relevant RCWs and consistency with Washington State Department of Agriculture and Conservation District guidance on farm management. Many commenters expressed concern that differences between local and state terminology could lead to confusion or inconsistent enforcement.

There was also support for stronger interagency coordination, including efforts to harmonize definitions of agricultural activity, animal density thresholds, and best management practices. Respondents viewed alignment and clarity as critical to reducing regulatory uncertainty and supporting compliance by property owners. In summary, commenters sought a comprehensive and coherent framework that treats equine operations equitably within the broader agricultural system.

## Equestrian Facility Code - Qualitative

### Summary

In response to the public review draft of Kitsap County's proposed Equine Code, 242 comments were received. The most frequently cited concern was the disproportionate impact of the code on small farms and rural equestrian owners. These comments were combined with strong objections to the 200-foot setback requirements and the complexity of the Conditional Use Permit process. Many comments tied these issues directly to agricultural viability under the Growth Management Act, emphasizing that the proposed regulations may discourage equestrian activities that are integral to rural character and agricultural sustainability.

Legal and constitutional concerns were also raised, with reference to specific case law. Environmental protection was another recurring theme, with respondents split between those who felt protections already exist under other regulations and those who supported targeted safeguards.

A substantial group characterized the draft as unnecessary overreach, arguing that it duplicates existing law and disproportionately harms small equestrian operations while favoring larger facilities. Support for regulation was present, though generally qualified: supporters emphasized the need for balance, neighbor protections, and reasonable standards that do not undermine equestrian viability.

Overall, the analysis shows that while there is acknowledgement of the need for some regulation of equestrian activities, the draft code as written is widely perceived as overly restrictive, inequitable, and inconsistent with both agricultural policy and rural community values. The responses suggest that significant revisions would be necessary to achieve widespread support from the local equestrian community.

## General Opposition to Regulations

Count: 137 | 57% of total comments

A substantial group of commenters viewed the draft code as unnecessary, duplicative, or even punitive. They argued that the code would impose disproportionate burdens on equestrian operators without creating meaningful new protections for neighbors or the environment. Some characterized the draft as regulatory overreach that discourages small farms, increases costs, and risks undermining equestrian culture in Kitsap County. This oppositional stance often overlapped with themes of legal risk, agricultural viability, and setbacks.

## General Support for Regulations

Count: 83 | 34% of total comments

A meaningful number of respondents expressed support for the County's effort to regulate equestrian facilities. These individuals highlighted the importance of protecting neighboring properties, water quality, and environmental resources. Supportive comments commonly framed regulation as necessary to balance equestrian activity with broader community interests, while urging that requirements remain reasonable and achievable.

## Small Farm / Rural Equity

Count: 173 | 72% of total comments

The theme of fairness and equity for small-scale equestrian operations was dominant. Many individuals explained that their family farms, hobby farms, or small-acreage properties would be disproportionately impacted by the proposed code requirements. They contrasted their operations with larger commercial facilities, which may be able to absorb the regulatory burden. Comments underscored the cultural and economic importance of equestrian activity for rural identity and family life, with a repeated call for proportional and equitable regulation.

## Setbacks and Land Use Restrictions

Count: 85 | 35% of total comments

The setback requirements—most notably the 200-foot distance for paddocks and manure storage—were among the most frequently cited concerns. Commenters argued these requirements are impractical for small-acreage properties and would effectively prohibit equestrian use in many rural areas. Several stated that such blanket requirements do not account for site-specific conditions and may conflict with existing agricultural best management practices. Overall, setbacks were described as a primary barrier to maintaining viable equestrian activities and operations.

## Environmental Protections

Count: 82 | 34% of total comments

Comments on environmental concerns were divided. Several noted that existing regulations already address issues such as runoff, odor, dust, and noise. These individuals argued that duplicating such requirements in the equine code adds unnecessary complexity. Other commenters supported retaining environmental safeguards but emphasized that they should be implemented in a targeted and balanced manner. This theme demonstrates a tension between recognition of environmental impacts and resistance to perceived regulatory duplication.

## Growth Management Act - Agriculture

Count: 61 | 25% of total comments

A large subset of comments focused on potential conflicts with the Growth Management Act (RCW 36.70A). Commenters stressed that equestrian operations are an agricultural use and contribute to rural character and agricultural viability. They argued that the draft code, by imposing significant new restrictions, undermines the GMA mandate to conserve and encourage agriculture. Some stated that the County could be vulnerable to a Growth Management Hearings Board appeal if the ordinance is adopted as written.

## Permitting Burdens

Count: 60 | 25% of total comments

Many respondents expressed concern about the Conditional Use Permit (CUP) process proposed in the draft. The distinction between Type II CUPs (for boarding only) and Type III CUPs (for lessons or training) was described as inequitable and without a clear policy basis. Numerous comments stressed the financial and administrative burden of pursuing CUPs, especially for small equestrian operators. The requirement to reapply for CUP review when facilities expand was criticized as excessive, costly, and a disincentive to long-term investment.

## Legal and Constitutional Concerns

Count: 34 | 14% of total comments

Several commenters felt that the draft code was legally unsound and unenforceable. Concerns included vagueness and arbitrary enforcement standards, with specific references to substantive due process and equal protection principles. Others raised the issue of uncompensated regulatory takings, noting that setback and permitting requirements could deprive small property owners of reasonable use of their land. A recurring point was that the draft may open the County to litigation by failing to provide clear, objective criteria and by treating substantially similar land uses differently (e.g., boarding versus training facilities).

## Other

### Summary

A total of 14 written comments were received during the YOTR public comment period that addressed topics outside the primary theme areas of agriculture, environment, and rural policy. These comments raised a variety of procedural, interpretive, and administrative considerations regarding the draft code. They reflected the perspectives of stakeholders seeking clarity, coordination, and effective implementation across multiple sections of the County's development regulations.

Many respondents focused on ensuring that the proposed code is easy to understand, consistently applied, and compatible with existing County procedures. Several emphasized the importance of public communication and clear definitions to avoid confusion in code interpretation and enforcement. Others offered suggestions for refining administrative processes, aligning policies across departments, and improving transparency in decision-making.

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Respondents emphasized the importance of fairness, responsiveness, and ongoing communication between staff and community members.

These broader remarks underscored the public's interest in a planning system that is approachable and accountable. While less specific than other comments, they help illustrate the community's expectations for continued transparency, thoughtful implementation, and sustained public engagement throughout future County initiatives.

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Count: 2 | 14% of total comments

Some comments addressed environmental protection within the context of broader code implementation. Respondents noted the importance of integrating sustainability and resource conservation throughout County planning processes.

They encouraged the County to strengthen cross-references between environmental

standards and land use provisions, ensuring consistent application of environmental protections during permit review and enforcement.

## General Observations

Count: 2 | 14% of total comments

A few comments offered general reflections on the draft code and its presentation. Respondents expressed appreciation for the County's efforts to modernize its regulations but encouraged continued review for clarity and usability.

These broad observations underscored the importance of maintaining a well-organized and accessible code that reflects both technical accuracy and public understanding.

## Port Gamble S'lallam Tribe

### Comment Summary

A total of 1 comment was received from the Port Gamble S'Klallam Tribe. The Tribe expressed significant concerns regarding rural development, accessory dwelling units (ADUs), water resources, and wildlife corridor protections. The comment emphasizes the Tribe's sovereign treaty rights and the need to protect natural and cultural resources for future generations.

Note: Cross reference the ADU specific comment in the ADU section.

### Key Issues Raised

- Concern that ADUs and middle housing should be limited to urban growth areas or LAMIRDs, and not allowed in rural areas.
- Opposition to reclassification requests that would expand rural development; rural development is seen as inconsistent with rural character.
- Concern that additional rural development disproportionately impacts critical areas and undermines environmental integrity.
- Recommendation to strengthen policies on water resources, including identifying and protecting natural areas that contribute to aquifer recharge.
- Emphasis on wildlife corridors: critical need to connect fragmented habitats near the PGST reservation to the Kitsap and Olympic peninsulas.
- Cultural and ecological importance of maintaining biodiversity for species such as deer, elk, black bears, and mountain lions.

- Stress on climate change impacts and the urgency of ensuring resilience for wildlife and ecosystems.
- Assertion that treaty rights must be upheld and protected in land use planning decisions.
- The Tribe's comments highlight potential conflicts between rural housing expansion and environmental protection. Their position emphasizes restricting ADUs and middle housing to designated growth areas, aligning with the Growth Management Act's intent to preserve rural character.