



Department of Community Development

Board of County Commissioners STAFF REPORT Comprehensive Plan Amendments

DATE: May 11, 2026
TO: Kitsap County Board of Commissioners
FROM: Garrett Ballew, Long Range Planner
SUBJECT: Proposed Comprehensive Plan Amendments in Response to Remand Order

Attachments:

1. Memo: Proposed Comprehensive Plan Updates to Address Housing and Employment Capacity
2. LCA Summary - Employment Worksheets
3. LCA Summary – Residential Worksheets
4. GMHB Final Decision and Order, August 2025
5. GMHB Order Granting Extension of Deadline, November 2025
6. PSRC Certification Report, August 2025

***Note:** The Comprehensive Plan sections with proposed changes shown using redline/strikeout format are included in the Attachments to the Ordinance.

OVERVIEW

The Department of Community Development has prepared amendments to the Land Use, Transportation, and Housing chapters, and Appendix A of the 2024 Comprehensive Plan to address and comply with the Washington State Growth Management Hearings Board (GMHB) remand order (Attachment 4) and the certification conditions of the Puget Sound Regional Council (PSRC) (Attachment 6).

SEPA

The DNS SEPA Determination of Non-Significance (DNS) was issued on November 10, 2025. The DNS Comment period ended November 25, 2025. No comments were received on the DNS. An addendum to the DNS was issued April 22, 2026.

PUBLIC COMMENT

Public comment period was provided for the amendments, from April 22, 2026, to May 12, 2026. The comment form was provided on the project website and was promoted through GovDelivery and the Department newsletter.

PUBLIC OUTREACH/PARTICIPATION

Public participation is an essential and required component for updating Comprehensive Plan elements. The list below outlines the outreach and participation that has occurred to date.

- **Community Consultations.** On April 1 and April 8, 2026, County staff gave presentations on proposed comprehensive plan amendments to the Central Kitsap Community Council and the Kingston Community Advisory Council respectively.
- **Internal Review.** To ensure internal consistency and correct implementation procedures, DCD Long Range Planning staff consulted with the Building and Fire Safety division, Outreach division, and GIS specialist.
- **Project Webpage.** Kitsap County utilized a dedicated Comprehensive Plan webpage. The webpage provided an opportunity for the public to stay current with the development and review process, as well as submit comments, and review all draft documents related to the update.
- **Planning Commission.** Staff briefed the Planning Commission on October 21, 2025, January 6, 2026, and April 21, 2026.
- **Board of Commissioners.** Staff briefed the Board of County Commissioners on the Comp Plan amendments on October 13, 2025, January 5, 2026, and April 13, 2026, ahead of the May 11, 2026, Board public hearing.

BACKGROUND

On August 8, 2025, the GMHB issued a Final Decision and Order (Attachment 4) finding that the County's 2024 Comprehensive Plan was noncompliant with the Growth Management Act (GMA), RCW 36.70A, in several respects. The GMHB identified the following deficiencies:

- **Housing.** The residential land capacity analysis (LCA) for the Housing element overstated redevelopment capacity, excluded most residential potential in mixed-use zones, and failed to demonstrate sufficient housing unit capacity for all income groups, particularly extremely low to moderate housing (0-80% area median income (AMI)).
- **Wildfire Risk and Planning.** The Land Use element did not adequately address wildfire risk and emergency evacuation. The Plan did not adopt recognized wildfire planning frameworks, such as the International Wildland Urban Interface code (IWUIC) or Firewise USA standards, or equivalent alternatives.

On August 28, 2025, the PSRC issued its Certification Report on the 2024 Comprehensive Plan (Attachment 6). The PSRC identified the following deficiencies:

- **Housing.** The PSRC concurred with the GMHB’s finding that the Comprehensive Plan showed a housing deficit for all income groups, particularly below 80% AMI.
- **Employment Capacity.** The Land Use element showed a countywide employment capacity deficit, particularly in the Silverdale regional center and other unincorporated UGAs.
- **Air Quality.** The Transportation element lacked a required policy ensuring compliance with federal and state air quality standards and reduction of greenhouse gas emissions.

The GMHB’s original Order required the identified comp plan deficiencies to be resolved and adopted by ordinance no later than February 4, 2026. However, in November 2025, the County requested and received an extension of the deadline to June 30, 2026 (Attachment 5). Both the GMHB appeal issues and the PSRC certification issues must be addressed by this date.

SUMMARY

Additional goals, policies, and strategies have been proposed for the Land Use and Transportation chapters to address the wildfire, emergency evacuation, and air quality issues raised by the GMHB and PSRC.

Refinements to the Land Capacity Analysis (LCA) methodology and calculations have been made to address the identified deficiencies of the 2024 plan regarding housing and employment capacity (Attachments 2 and 3). Detailed LCA adjustments are summarized in a separate memo (Attachment 1).

All proposed amendments to the Comprehensive Plan are shown as redlined edits in the appendix of the ordinance. These documents have been posted to the project webpage for public review ahead of the May 11, 2026, Public Hearing.

NEXT STEPS

June 8, 2026: Adoption of Comprehensive Plan Amendments at Regular Board Meeting

July 2026: Soon after local adoption, staff sends compliance report to the GMHB, PSRC, and Department of Commerce, and issues Notice of Adoption.

Attachment 1

Proposed Comprehensive Plan Updates to Address Housing and Employment Capacity

Housing Capacity for All Economic Segments

Condition: Update plan and development regulations to provide sufficient housing capacity for all economic segments.

The adopted plan documents that the county does not have capacity to accommodate its housing need allocations, in particular needs below 80% of the Area Median Income (AMI).

The 2024 Comprehensive Plan identified aggregated housing needs of:

- 8,354 units for income levels below 80% of the AMI.
- 2,040 units for income levels between 81%-120% of the AMI.
- 4,103 units for income levels greater than 120% of the AMI.

Original Table 5.4 Adopted Comprehensive Plan Appendix A – Housing Element Technical Analysis - Page 17

Income Level (% AMI)	Projected Housing Need	Zone Categories Serving These Needs	Aggregated Housing Needs ¹	Total Capacity	Capacity Surplus (Deficit)
0-30% PSH	1,214	Low-Rise Multifamily, Mid-Rise Multifamily, ADUs	7,747 (non-pipeline) + 607 (pipeline) = 8,354	6,187 (non-pipeline) + 607 (pipeline) + 381 ADU = 7,175	(1,179)
0-30% Non-PSH	2,768				
31-50%	2,376				
51-80%	1,996				
81-100%	1,028	Moderate Density	2,040	1,874	(166)
101-120%	1,012				
>120%	4,103	Low Density	2,342 (non-pipeline) + 1,761 (pipeline) = 4,103	2,418 (non-pipeline) + 1,761 (pipeline) = 4,179	76
Total	14,497		12,129 (non-pipeline) + 2,368 (pipeline) = 14,497	13,228 (including 2,368 pipeline units and 381 ADUs)	(1,269)

Proposed Adjustment – Reduction of Future Roads/ROW:

Step 1.5 of the LCA methodology identifies Under-Utilized Properties. Under-utilized/redevelopable properties contain some amount of existing development, but there is a strong possibility that the existing use will be converted to a more intensive use during the planning period.

The land capacity analysis methodology identifies future roads/right of way needs as a deduction.

This deduction is intended to address future infrastructure needs by new development and market conditions. Roads, right of way, and traffic mitigation are necessary for new development, particularly on undeveloped properties.

Because under-utilized/redevelopable lands in urban areas may already be served by established road networks, Kitsap County proposes a reduction to future roads/rights-of-way for under-utilized/redevelopable properties from 20% to 5%.

This adjustment reveals capacity for **354 single-family units** and **1052 multi-family units**.

With this proposed adjustment:

- Capacity is 8,379 units for income levels below 80% of the AMI.
 - **(Surplus of 25)**
- Capacity is 2,361 units for income levels between 81%-120% of the AMI.
 - **(Surplus of 321)**
- Capacity is 4,746 units for income levels greater than 120% of the AMI.
 - **(Surplus of 643)**

Adjusted Table 5.4 Adopted Comprehensive Plan Appendix A – Housing Element Technical Analysis - Page 17 (with Roads/Right of Way Reduction from 20% to 5%)

Income Level (% AMI)	Projected Housing Need	Zone Categories Serving These Needs	Aggregated Housing Needs ¹	Total Capacity	Capacity Surplus (Deficit)
0-30% PSH	1,214	Low-Rise Multifamily, Mid-Rise Multifamily, ADUs	8,354	8,379 (7,998 + 381 ADU units = 8,379)	25
0-30% Non-PSH	2,768				
31-50%	2,376				
51-80%	1,996				
81-100%	1,028	Moderate Density	2,040	2,361	321
101-120%	1,012				
>120%	4,103	Low Density	4,103	4,746	643
Total	14,497		12,129 (non-pipeline) + 2,368 (pipeline) = 14,497	15,487 (including 2,368 pipeline units and 381 ADUs)	990

Employment Capacity

Condition: Update plan to demonstrate capacity for the employment growth targets.

The Comprehensive Plan shows a deficit of employment capacity countywide and in most individual urban unincorporated areas, including the Silverdale regional center.

Adopted Comprehensive Plan Table 4. - Comparison of Employment Growth Targets

UGA	ADJUSTED GROWTH 2022-2044	LAND CAPACITY PREFERRED ALTERNATIVE	GROWTH TO LAND CAPACITY PREFERRED ALTERNATIVE 2022-2024
BREMERTON	2,454	3,922	1,468
SILVERDALE	11,023	10,391	(632)
KINGSTON	1,343	801	(542)
POULSBO	103	90	(13)
PORT ORCHARD	1,429	1,106	(323)
CENTRAL KITSAP	1,380	1,276	(104)
RURAL	2,150	2,150	0
TOTAL	19,882	19,736	(146)

Proposed Adjustment – Reduction of Future Roads/ROW:

Applying the future roads/rights-of-way reduction for under-utilized/redevelopable parcels from 20% to 5% as described in the above Housing Capacity section.

With this adjustment:

- Employment capacity for the Silverdale UGA is 11,188.
 - **(Surplus of 165)**
- Employment capacity for the Central Kitsap UGA is 1,451.
 - **(Surplus of 71)**
- Employment capacity for the Bremerton UGA is 4,037.
 - **(Surplus of 1,583)**
- Employment capacity for the **Kingston, Port Orchard, and Poulsbo UGAs remained below their respective employment growth targets.** Additional proposed adjustments were made to these UGAs as described below.

Proposed Adjustments – Kingston:

The following adjustments are proposed for the Urban Village Center, Commercial, Neighborhood Commercial, and Industrial Zones:

- **Reduction of Future Roads/ROW for Vacant Parcels from 20% to 10%**
 - Much of the area of Kingston within these zones has been developed and is served by existing roads and Right-of-Ways.
 - A reduction to 10% is considerate of current development and considers future development in the Industrial Zone where there are vacant parcels.
- **Reduction of Public Facilities for Redevelopment from 20% to 5%**
 - Parcels within these areas of Kingston are developed and are served by existing utilities. Additional utility work for redevelopment is expected to be minimal.
- **Reduction of Public Facilities for Vacant Parcels from 20% to 10%**
 - Parcels within these areas of Kingston are developed and are served by existing utilities. Additional utility work for redevelopment is expected to be minimal.
 - A reduction to 10% is considerate of current development and considers future development in the Industrial Zone where there are vacant parcels.

The following adjustment is proposed for the Urban Village Center Zone:

- **Increasing Floor Area Ratio (FAR) from 0.32 to 0.60**
 - Kingston is now designated as a Countywide Growth Center and as such is expected to support higher density development.

The following adjustments are proposed for the Commercial Center Zone:

- **Increased FAR from 0.32 to 0.60**
 - Kingston is now designated as a Countywide Growth Center and as such is expected to support higher density development.
- **Revealing Employment Capacity by Reducing Commercial Employment Density Assumption from 500 to 400 sf per Employee**
 - Kingston is now designated as a Countywide Growth Center and as such is anticipated to support higher density employment.

RESULT (Rounded Calculations from Adjustments): 1,425/1,343 jobs, Kingston employment target reached (**Surplus of 82**).

Proposed Adjustments – Port Orchard

The following adjustments are proposed for the Commercial Zone:

- **Revealing Employment Capacity by Reducing Commercial Employment Density Assumption from 500 to 400 sf per Employee**
 - The recommended range for Commercial Zoning is 300-600 as outlined on page 63 of the [2021 Buildable Lands Report for Kitsap County](#) (BLR).
 - A significant portion of future growth in this area is expected to include restaurants, medical uses, office space, and small retail uses. The BLR advises that a value at the lower end of the range be selected if a significant portion of growth is expected to include the uses listed above.
 - The area does not host many large stores, hotels, or motels, which would warrant a higher density assumption per the BLR.
 - The Bethel Road and Mile Hill areas are comprised of smaller lots that are unlikely to support the future development of large retail stores or hotel accommodations.

RESULT (Rounded Calculations from Adjustments): 1,524/1,429 jobs, Port Orchard employment target reached (**Surplus of 95**).

Proposed Adjustments – Poulsbo

The following adjustments are proposed for the Light Industrial Zone:

- **Reduced Public Facility from 20% to 5%**
 - 11 of the 12 parcels within the zone are developed and are served by existing utilities. Additional utility connection and work for redevelopment is expected to be minimal.
- **Reduced Unavailable Lands from 20% to 5%**
 - 11 of the 12 parcels within the zone are currently developed. 5% is retained for potential density increases.
- **Increased Floor Area Ratio (FAR) for Light Industrial Zoning from 0.20 to 0.25**
 - This adjustment applies to one parcel which is not currently developed. Surrounding parcels have developed in recent years, and the County assumes that the highest and best use of the parcel will meet or exceed a FAR of 0.25.
- **Revealing Employment Capacity by Reducing Employment Density Assumption from 969 to 900 sf per Employee**
 - This adjustment applies to one parcel which is not currently developed. Surrounding parcels have developed in recent years, and the County assumes that the highest and best use of the parcel will meet an employment assumption of 900.
 - The [2021 Buildable Lands Report for Kitsap County](#) recommends an employment density assumption between 700-1,200 for industrial zoning.

RESULT (Rounded Calculations from Adjustments): 104/103 jobs, employment target reached (**Surplus of 1**).

Adjusted Table 4. - Comparison of Employment Growth Targets

UGA	ADJUSTED GROWTH 2022-2044	LAND CAPACITY PREFERRED ALTERNATIVE	GROWTH TO LAND CAPACITY PREFERRED ALTERNATIVE 2022-2044
BREMERTON	2,454	4,037	1,583
SILVERDALE	11,023	11,188	165
KINGSTON	1,343	1,425	82
POULSBO	103	104	1
PORT ORCHARD	1,429	1,524	95
CENTRAL KITSAP	1,380	1,451	71
RURAL	2,150	2,150	0
Total	19,882	21,879	1,997

KITSAP COUNTY

Attachment 2 - Employment Land Capacity Analysis

Urban Growth Areas

Summary worksheets for the results of Kitsap County's employment land capacity analysis in the unincorporated urban growth areas





Bremerton East

Commercial Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Market Factor (-)	Critical Areas (-)	Future Roads/Right of Way Needs (-)	Future Public Facility Needs (-)	Unavailable Lands (-)	Determine Net Acres	Tree Retention (-)	FAR	Calculate Employment Capacity
Redevelopable Subtotal	0.00	17.99	10.70	2.38	0.15	0.14	0.72	3.91	3.87	53916	108
Vacant Subtotal	0.00	1.11	0.00	0.42	0.14	0.11	0.09	0.35	0.35	4826	10
Total	0.00	19.10	10.70	2.80	0.28	0.25	0.81	4.26	4.21	58742	117

Industrial Capacity

Redevelopable Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Total	0.00	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Mixed Use Capacity

Redevelopable Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Redevelopment Total	0.00	17.99	10.70	2.38	0.15	0.14	0.72	3.91	3.87	53916	108
Vacant Total	0.00	1.11	0.00	0.42	0.14	0.11	0.09	0.35	0.35	4826	10
Total Capacity	0.00	19.10	10.7	2.80	0.28	0.25	0.81	4.26	4.21	58742	117

Capacity by Zone	Net Acres	Net Square Foot Capacity	Employment Capacity
Urban Village Center	0.00	0	0
Regional Center	0.00	0	0
Commercial	4.21	58742	117
Neighborhood Commercial	0.00	0	0
Low Intensity Commercial	0.00	0	0
Industrial	0.00	0	0
Business Center	0.00	0	0
Subtotal	4.21	58742	117
Total	4.21	58742	117



Bremerton West

Commercial Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Market Factor (-)	Critical Areas (-)	Future Roads/Right of Way Needs (-)	Future Public Facility Needs (-)	Unavailable Lands (-)	Determine Net Acres	Tree Retention (-)	FAR	Calculate Employment Capacity
Redevelopable Subtotal	0.00	45.01	28.04	2.38	0.27	0.25	1.33	1.33	12.67	165570	331
Vacant Subtotal	0.00	2.75	0.00	0.96	0.26	0.21	0.17	0.17	1.14	15923	32
Total	0.00	47.76	28.04	3.34	0.53	0.46	1.50	1.50	13.81	181493	363

Industrial Capacity

Redevelopable Subtotal	9.70	40.88	25.87	0.00	0.00	0.00	0.00	0.00	15.01	219804	275
Vacant Subtotal	0.00	133.55	0.00	26.02	10.66	8.53	6.82	6.82	32.75	485023	606
Total	9.70	174.43	25.87	26.02	10.66	8.53	6.82	6.82	47.76	704827	881

Mixed Use Capacity

Redevelopable Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Redevelopment Total	9.70	85.89	53.91	2.38	0.27	0.25	1.33	1.33	27.68	385374	606
Vacant Total	0.00	136.30	0.00	26.98	10.92	8.73	6.99	6.99	33.89	500945	638
Total Capacity	9.70	222.19	53.91	29.36	11.19	8.98	8.32	8.32	61.57	886319	1244

Capacity by Zone	Net Acres	Net Square Foot Capacity	Employment Capacity
Urban Village Center	0.00	0	0
Regional Center	0.00	0	0
Commercial	13.81	181493	363
Neighborhood Commercial	0.00	0	0
Low Intensity Commercial	0.00	0	0
Industrial	21.02	308815	386
Industrial /MRO	26.74	396012	495
Business Center	0.00	0	0
Subtotal	61.57	886319	1244



Unincorporated Urban Growth Area

Employment Land Supply Capacity

Total	61.57	886319	1244
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Gorst

	Infrastructure Gap Review (Gross Acres)	Define Development Status	Market Factor (-)	Critical Areas (-)	Future Roads/Rig ht of Way Needs (-)	Future Public Facility Needs (-)	Unavailable Lands (-)	Net Acres	Tree Retention (-)	FAR	Calculate Employment Capacity
Commercial Capacity											
Redevelopable Subtotal	0.00	53.49	26.22	12.11	0.67	0.64	4.23	9.62	9.46	131883	264
Vacant Subtotal	0.00	22.46	0.00	11.26	2.22	1.77	1.95	5.26	5.15	71827	144
Total	0.00	75.95	26.22	23.37	2.89	2.41	6.18	14.87	14.61	203710	407

Industrial Capacity

Redevelopable Subtotal	0.00	73.89	73.89	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	25.99	0.00	12.97	2.60	2.08	2.29	6.04	5.92	87684	110
Total	0.00	99.88	73.89	12.97	2.60	2.08	2.29	6.04	5.92	87684	110

Mixed Use Capacity

Redevelopable Subtotal	0.00	1.32	0.00	0.00	0.07	0.06	0.33	0.86	0.84	11778.10	23.56
Vacant Subtotal	0.00	0.63	0.00	0.00	0.13	0.10	0.11	0.29	0.28	3961.52	7.92
Total	0.00	1.94	0.00	0.00	0.19	0.16	0.44	1.15	1.13	15740	31

Redevelopment Total	0.00	128.70	100.11	12.11	0.74	0.70	4.56	10.48	10.31	143661	287
Vacant Total	0.00	49.08	0.00	24.23	4.95	3.96	4.35	11.59	11.36	163472	261
Total Capacity	0.00	177.77	100.11	36.34	5.68	4.66	8.91	22.07	21.66	307134	549

Capacity by Zone	Net Acres	Net Square Foot Capacity	Employment Capacity
Urban Village Center	0.00	0	0
Regional Center	0.00	0	0
Commercial	14.61	203710	407
Neighborhood Commercial	0.00	0	0
Low Intensity Commercial	1.13	15740	31
Industrial	0.12	1751	2
Industrial /MRO	5.80	85933	107
Business Center	0.00	0	0



Subtotal	21.66	307134	549
Total	21.66	307134	549

Puget Sound Industrial Center – Bremerton (PSIC)

Commercial Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Market Factor (-)	Critical Areas (-)	Future Roads/Right of Way Needs (-)	Future Public Facility Needs (-)	Unavailable Lands (-)	Net Acres	Tree Retention (-)	FAR	Calculate Employment Capacity
Redevelopable Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Industrial Capacity

Redevelopable Subtotal	89.29	132.93	75.96	18.49	4.09	6.88	11.01	16.50	16.17	239459	278
Vacant Subtotal	24.93	256.65	0.00	41.73	42.98	34.39	33.02	104.52	102.43	1517079	1849
Total	114.22	389.58	75.96	60.22	47.07	41.27	44.04	121.02	118.60	1756539	2127

Mixed Use Capacity

Redevelopable Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Vacant Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Redevelopment Total	89.29	132.93	75.96	18.49	4.09	6.88	11.01	16.50	16.17	239459	278
Vacant Total	24.93	256.65	0.00	41.73	42.98	34.39	33.02	104.52	102.43	1517079	1849
Total Capacity	114.22	389.58	75.96	60.22	47.07	41.27	44.04	121.02	118.60	1756539	2127

Capacity by Zone	Net Acres	Net Square Foot Capacity	Employment Capacity
Urban Village Center	0.00	0	0
Regional Center	0.00	0	0
Commercial	0.00	0	0
Neighborhood Commercial	0.00	0	0
Low Intensity Commercial	0.00	0	0
Industrial	100.01	1481238	1852
Industrial /MRO	0.00	0	0



Unincorporated Urban Growth Area

Employment Land Supply Capacity

Business Center	18.59	275301	275
Subtotal	118.60	1756539	2127
Total	118.60	1756539	2127

Silverdale

Commercial Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Market Factor (-)	Critical Areas (-)	Future Roads/Right of Way Needs (-)	Future Public Facility Needs (-)	Unavailable Lands (-)	Net Acres	Tree Retention (-)	FAR	Calculate Employment Capacity
Redevelopable Subtotal	59.49	189.47	136.82	14.85	8.04	6.56	12.03	27.33	26.82	370719	746
Vacant Subtotal	19.73	178.90	0.00	45.55	26.53	21.22	18.44	67.16	65.83	917643	1411
Total	79.22	368.37	136.82	60.40	34.57	27.78	30.48	94.49	92.65	1288362	2157

Industrial Capacity

Redevelopable Subtotal	0.00	368.28	279.46	26.52	2.81	2.67	13.93	42.89	42.16	622604	760
Vacant Subtotal	0.00	147.71	0.00	35.52	19.34	15.47	12.38	65.01	64.02	948090	1167
Total	0.00	515.99	279.46	62.04	22.14	18.14	26.31	107.90	106.17	1570695	1926

Mixed Use Capacity

Redevelopable Subtotal	0.93	110.87	0.00	0.00	5.17	4.88	24.93	100.62	98.81	3228173	6456
Vacant Subtotal	0.00	18.47	0.00	0.00	3.43	2.74	2.20	10.10	9.93	324256	649
Total	0.93	129.34	0.00	0.00	8.60	7.62	27.12	110.72	108.74	3552429	7105

Redevelopment Total	60.42	668.62	416.28	41.37	16.01	14.11	50.89	170.84	167.79	4221496	7962
Vacant Total	19.73	345.08	0.00	81.07	49.29	39.44	33.01	142.27	139.77	2189989	3226
Total Capacity	80.15	1013.70	416.28	122.44	65.31	53.54	83.90	313.10	307.56	6411485	11188

Capacity by Zone	Net Acres	Net Square Foot Capacity	Employment Capacity
Urban Village Center	0.00	0	0
Regional Center	108.74	3552429	7105
Commercial	64.60	900403	1801
Neighborhood Commercial	28.06	387959	356
Low Intensity Commercial	0.00	0	0
Industrial	79.99	1182840	1479
Industrial /MRO	16.21	240104	300



Unincorporated Urban Growth Area

Employment Land Supply Capacity

Business Center	9.98	147750	148
Subtotal	307.56	6411485	11188
Total	307.56	6411485	11188

Kingston

Commercial Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Market Factor (-)	Critical Areas (-)	Future Roads/Right of Way Needs (-)	Future Public Facility Needs (-)	Unavailable Lands (-)	Net Acres	Tree Retention (-)	FAR	Calculate Employment Capacity
Redevelopable Subtotal	0.00	40.04	30.22	3.97	0.28	0.26	1.37	3.93	3.86	100948	252
Vacant Subtotal	0.00	7.63	0.00	2.87	0.48	0.43	0.77	3.08	3.02	79004	198
Total	0.00	47.67	30.22	6.84	0.75	0.69	2.15	7.02	6.89	179951	450

Industrial Capacity

Redevelopable Subtotal	0.00	10.20	10.20	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	10.16	0.00	6.39	0.38	0.34	0.61	2.44	2.39	35458	44
Total	0.00	20.36	10.2	6.39	0.38	0.34	0.61	2.44	2.39	35458	44

Mixed Use Capacity

Redevelopable Subtotal	0.00	11.53	0.00	0.00	0.00	0.00	0.00	11.53	11.53	301348	753
Vacant Subtotal	0.00	2.75	0.00	0.00	0.01	0.01	0.01	2.72	2.72	71111	178
Total	0.00	14.28	0.00	0.00	0.01	0.01	0.01	14.25	14.25	372459	931

Redevelopment Total	0.00	61.77	40.42	3.97	0.28	0.26	1.37	15.46	15.39	402296	1006
Vacant Total	0.00	20.54	0.00	9.26	0.86	0.77	1.39	8.25	8.14	185572	420
Total Capacity	0.00	82.31	40.42	13.23	1.14	1.04	2.77	23.71	23.53	587868	1425

Capacity by Zone	Net Acres	Net Square Foot Capacity	Employment Capacity
Urban Village Center	14.25	372459	931
Regional Center	0.00	0	0
Commercial	6.89	179951	450
Neighborhood Commercial	0.00	0	0
Low Intensity Commercial	0.00	0	0
Industrial	2.39	35458	44
Industrial /MRO	0.00	0	0



Unincorporated Urban Growth Area

Employment Land Supply Capacity

Business Center	0.00	0	0
Subtotal	23.53	587868	1425
Total	23.53	587868	1425

Poulsbo Urban Transition Area

Commercial Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Market Factor (-)	Critical Areas (-)	Future Roads/Right of Way Needs (-)	Future Public Facility Needs (-)	Unavailable Lands (-)	Determine Net Acres	FAR	Calculate Employment Capacity
Redevelopable Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Industrial Capacity

Redevelopable Subtotal	0.00	26.29	26.29	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	1.25	0.00	0.00	0.06	0.06	0.06	1.07	93427	104
Total	0.00	27.54	26.29	0.00	0.06	0.06	0.06	1.07	93427	104

Redevelopment Total	0.00	26.29	26.29	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Total	0.00	1.25	0.00	0.00	0.06	0.06	0.06	1.07	93427	104
Total Capacity	0.00	27.54	26.29	0.00	0.06	0.06	0.06	1.07	93427	104

Capacity by Zone	Net Acres	Net Square Foot Capacity	Employment Capacity
C-1 Downtown/Front Street	0.00	0	0
C-2 Viking Avenue	0.00	0	0
C-3 SR 305 Corridor	0.00	0	0
C-4 College Market Place	0.00	0	0
Office Commercial	0.00	0	0
Industrial	0.00	0	0
Business Park	0.00	0	0
Light Industrial	1.07	93427	104
Subtotal	1.07	93427	104



Unincorporated Urban Growth Area

Employment Land Supply Capacity

Total	1.07	93427	104
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Port Orchard

	Infrastructure Gap Review (Gross Acres)	Define Development Status	Market Factor (-)	Critical Areas (-)	Future Roads/Rig ht of Way Needs (-)	Future Public Facility Needs (-)	Unavailable Lands (-)	Determine Net Acres	Tree Retention (-)	FAR	Calculate Employment Capacity
Commercial Capacity											
Redevelopable Subtotal	0.00	97.04	62.87	1.34	5.64	8.80	15.97	23.46	23.08	315338	788
Vacant Subtotal	0.00	30.02	0.00	3.98	3.06	5.50	6.36	21.31	21.00	292707	732
Total	0.00	127.06	62.87	5.32	8.70	14.30	22.33	44.78	44.08	608045	1520

Industrial Capacity

Redevelopable Subtotal	17.81	22.09	18.51	1.11	0.49	0.40	0.79	0.79	0.77	0	0
Vacant Subtotal	1.69	1.69	1.05	0.00	0.13	0.10	0.20	0.20	0.20	2973	4
Total	19.50	23.78	19.56	1.11	0.62	0.50	1.00	1.00	0.98	2973	4

Mixed Use Capacity

Redevelopable Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Redevelopment Total	17.81	119.13	81.38	2.45	6.13	9.20	16.76	24.25	23.85	315338	788
Vacant Total	1.69	31.71	1.05	3.98	3.19	5.61	6.56	21.52	21.20	295679	735
Total Capacity	19.50	150.84	82.43	6.43	9.32	14.80	23.33	45.77	45.05	611017	1524

Capacity by Zone	Net Acres	Net Square Foot Capacity	Employment Capacity
Urban Village Center	0.00	0	0
Regional Center	0.00	0	0
Commercial	42.84	590751	1477
Neighborhood Commercial	1.24	17294	43
Low Intensity Commercial	0.00	0	0
Industrial	0.98	2973	4
Business Center	0.00	0	0
Subtotal	45.05	611017	1524



Unincorporated Urban Growth Area

Employment Land Supply Capacity

Total	45.05	611017	1524
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Central Kitsap

Commercial Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Market Factor (-)	Critical Areas (-)	Future Roads/Rig ht of Way Needs (-)	Future Public Facility Needs (-)	Unavailable Lands (-)	Determine Net Acres	Tree Retention (-)	FAR	Calculate Employment Capacity
Redevelopable Subtotal	0.00	190.73	141.14	15.77	1.67	1.59	8.31	24.11	21.90	327085	659
Vacant Subtotal	0.00	94.48	0.09	43.75	10.56	8.45	6.76	28.35	26.49	387620.02	775.24
Total	0.00	285.21	141.23	59.52	12.23	10.04	15.06	52.46	48.39	714705	1434

Industrial Capacity

Redevelopable Subtotal	0.00	12.28	12.28	0.00	0.00	0.00	0.00	0.00	21.90	0	0
Vacant Subtotal	0.00	4.59	0.00	2.72	0.37	0.30	0.24	0.96	27.03	13896	17
Total	0.00	16.87	12.28	2.72	0.37	0.30	0.24	0.96	48.93	13896	17

Mixed Use Capacity

Redevelopable Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Redevelopment Total	0.00	203.01	153.42	15.77	1.67	1.59	8.31	24.11	43.80	327085	659
Vacant Total	0.00	99.07	0.09	46.47	10.93	8.75	7.00	29.31	53.52	401516	793
Total Capacity	0.00	302.08	153.51	62.24	12.61	10.34	15.30	53.42	97.32	728601	1451

Capacity by Zone	Net Acres	Net Square Foot Capacity	Employment Capacity
Urban Village Center	0.00	0	0
Regional Center	0.00	0	0
Commercial	51.79	705603	1411
Neighborhood Commercial	0.67	9102	23
Low Intensity Commercial	0.00	0	0
Industrial	0.96	13896	17
Business Center	0.00	0	0
Subtotal	53.42	728601	1451



Unincorporated Urban Growth Area

Employment Land Supply Capacity

Total	53.42	728601	1451
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KITSAP COUNTY

Attachment 3 - Residential Land Capacity Analysis

Urban Growth Areas

Summary worksheets for the results of Kitsap County's residential land capacity analysis in the unincorporated urban growth areas





Unincorporated Urban Growth Area
Bremerton East

Residential Land Supply Capacity

Residential Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Exclude Parcels Unlikely to Develop (-)	Identify Critical Areas (-)	Identify Future Roads/Right of Way Needs (-)	Identify Future Public Facility Needs (-)	Account for Unavailable Lands (-)	Determine Net Acres	Tree Reduction (-)	Calculate Housing Capacity (Units)	Apply Persons per household to calculate population
Redevelopable Subtotal	203.85	904.19	701.70	73.48	11.90	15.52	30.80	70.78	69.94	272	605
Vacant Subtotal	47.89	123.92	0.37	46.83	10.82	8.66	14.54	42.69	42.29	356	791
Total	251.74	1028.11	702.07	120.31	22.73	24.18	45.35	113.47	112.23	628	1396

Mixed Use Capacity											
Redevelopable Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Redevelopment Total	203.85	904.19	701.70	73.48	11.90	15.52	30.80	70.78	69.94	272	605
Vacant Total	47.89	123.92	0.37	46.83	10.82	8.66	14.54	42.69	42.29	356	791
Total Capacity	251.74	1028.11	702.07	120.31	22.73	24.18	45.35	113.47	112.23	628	1396

Residential Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Greenbelt Zone	1.33	1	0	3
Urban Cluster Residential	0.00	0	0	0
Urban Low Residential	56.58	207	0	481
Urban Medium Residential	26.46	0	338	721
Urban High Residential	0.00	0	0	0
Urban Restricted Residential	27.87	82	0	190
Subtotal	112.23	290	338	1396

Mixed Use Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Urban Village Center	0.00	0	0	0
Regional Center	0.00	0	0	0
Commercial	0.00	0	0	0
Neighborhood Commercial	0.00	0	0	0
Low-Intensity Commercial	0.00	0	0	0
Subtotal	0.00	0	0	0
Total	112.23	290	338	1396



Unincorporated Urban Growth Area
Bremerton West

Residential Land Supply Capacity

Residential Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Exclude Parcels Unlikely to Develop (-)	Identify Critical Areas (-)	Identify Future Roads/Right of Way Needs (-)	Identify Future Public Facility Needs (-)	Account for Unavailable Lands (-)	Determine Net Acres	Tree Reduction (-)	Calculate Housing Capacity (Units)	Apply Persons per household to calculate population
Redevelopable Subtotal	376.26	1388.56	1157.61	72.04	16.32	25.66	46.21	70.72	69.56	151	345
Vacant Subtotal	64.73	143.37	42.96	35.26	9.25	7.40	12.94	35.57	35.23	394	893
Total	440.99	1531.93	1200.57	107.30	25.57	33.06	59.14	106.28	104.79	545	1238

Mixed Use Capacity											
Redevelopable Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Redevelopment Total	376.26	1388.56	1157.61	72.04	16.32	25.66	46.21	70.72	69.56	151	345
Vacant Total	64.73	143.37	42.96	35.26	9.25	7.40	12.94	35.57	35.23	394	893
Total Capacity	440.99	1531.93	1200.57	107.30	25.57	33.06	59.14	106.28	104.79	545	1238

Residential Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Greenbelt Zone	0.00	0	0	0
Urban Cluster Residential	0.00	0	0	0
Urban Low Residential	90.22	383	0	892
Urban Medium Residential	14.57	0	162	346
Urban High Residential	0.00	0	0	0
Urban Restricted Residential	0.00	0	0	0
Subtotal	104.79	383	162	1238

Mixed Use Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Urban Village Center	0.00	0	0	0
Regional Center	0.00	0	0	0
Commercial	0.00	0	0	0
Neighborhood Commercial	0.00	0	0	0
Low-Intensity Commercial	0.00	0	0	0
Subtotal	0.00	0	0	0
Total	104.79	383	162	1238



Unincorporated Urban Growth Area
Gorst

Residential Land Supply Capacity

Residential Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Exclude Parcels Unlikely to Develop (-)	Identify Critical Areas (-)	Identify Future Roads/Right of Way Needs (-)	Identify Future Public Facility Needs (-)	Account for Unavailable Lands (-)	Determine Net Acres	Tree Reduction (-)	Calculate Housing Capacity (Units)	Apply Persons per household to calculate population
Redevelopable Subtotal	0.00	30.04	19.60	2.51	0.36	2.22	1.96	3.40	3.34	9	20
Vacant Subtotal	0.00	9.50	0.00	4.27	0.75	0.60	0.84	3.05	3.01	14	33
Total	0.00	39.54	19.60	6.78	1.11	2.82	2.79	6.44	6.36	23	54

Mixed Use Capacity											
Redevelopable Subtotal	50.65	0.00	41.55	6.47	0.07	0.05	0.42	0.78	0.78	2	4
Vacant Subtotal	3.52	0.00	0.00	2.27	0.13	0.10	0.14	0.26	0.26	3	6
Total	54.17	0.00	41.55	8.74	0.19	0.15	0.56	1.04	1.04	4	9

Redevelopment Total	50.65	30.04	61.15	8.98	0.42	2.27	2.38	4.18	4.12	10	24
Vacant Total	3.52	9.50	0.00	6.54	0.87	0.70	0.98	3.31	3.27	17	39
Total Capacity	54.17	39.54	61.15	15.52	1.30	2.97	3.35	7.48	7.40	27	63

Residential Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Greenbelt Zone	0.00	0	0	0
Urban Cluster Residential	0.00	0	0	0
Urban Low Residential	1.47	7	0	16
Urban Medium Residential	0.00	0	0	0
Urban High Residential	0.00	0	0	0
Urban Restricted Residential	4.89	16	0	37
Subtotal	6.36	23	0	54

Mixed Use Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Urban Village Center	0.00	0	0	0
Regional Center	0.00	0	0	0
Commercial	0.00	0	0	0
Neighborhood Commercial	0.00	0	0	0
Low-Intensity Commercial	1.04	0	4	9
Subtotal	1.04	0	4	9
Total	7.40	23	4	63



Unincorporated Urban Growth Area
Puget Sound Industrial Center - Bremerton

Residential Land Supply Capacity

	Infrastructure Gap Review (Gross Acres)	Define Development Status	Exclude Parcels Unlikely to Develop (-)	Identify Critical Areas (-)	Identify Future Roads/Right of Way Needs (-)	Identify Future Public Facility Needs (-)	Account for Unavailable Lands (-)	Determine Net Acres	Tree Reduction (-)	Calculate Housing Capacity (Units)	Apply Persons per household to calculate population
Residential Capacity											
Redevelopable Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Mixed Use Capacity											
Redevelopable Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Subtotal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Redevelopment Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Vacant Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
Total Capacity	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0

Residential Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Greenbelt Zone	0.00	0	0	0
Urban Cluster Residential	0.00	0	0	0
Urban Low Residential	0.00	0	0	0
Urban Medium Residential	0.00	0	0	0
Urban High Residential	0.00	0	0	0
Urban Restricted Residential	0.00	0	0	0
Subtotal	0.00	0	0	0

Mixed Use Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Urban Village Center	0.00	0	0	0
Regional Center	0.00	0	0	0
Commercial	0.00	0	0	0
Neighborhood Commercial	0.00	0	0	0
Low-Intensity Commercial	0.00	0	0	0
Subtotal	0.00	0	0	0
Total	0.00	0	0	0



Unincorporated Urban Growth Area
Silverdale

Residential Land Supply Capacity

Residential Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Exclude Parcels Unlikely to Develop (-)	Identify Critical Areas (-)	Identify Future Roads/Right of Way Needs (-)	Identify Future Public Facility Needs (-)	Account for Unavailable Lands (-)	Determine Net Acres	Tree Reduction (-)	Calculate Housing Capacity (Units)	Apply Persons per household to calculate population
Redevelopable Subtotal	115.36	2844.64	2283.20	87.43	26.43	57.87	74.00	315.72	311.72	2266	5821
Vacant Subtotal	10.87	471.11	16.00	65.36	62.05	49.64	40.76	191.88	188.72	1789	4543
Total	126.23	3315.75	2299.20	152.79	88.48	107.51	114.76	507.59	500.44	4055	10364

Mixed Use Capacity											
Redevelopable Subtotal	60.42	727.45	499.52	64.23	7.88	6.92	21.58	73.19	73.19	2130	4516
Vacant Subtotal	0.00	127.52	0.00	29.08	10.57	8.46	7.01	27.80	27.80	816	1729
Total	60.42	854.97	499.52	93.31	18.45	15.38	28.59	101.00	101.00	2946	6245

Redevelopment Total	175.78	3572.09	2782.72	151.66	34.30	64.79	95.58	388.91	384.91	4396	10336
Vacant Total	10.87	598.63	16.00	94.44	72.62	58.10	47.76	219.68	216.52	2605	6272
Total Capacity	186.65	4170.72	2798.72	246.10	106.93	122.89	143.34	608.59	601.44	7001	16609

Residential Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Greenbelt Zone	0.00	0	0	0
Urban Cluster Residential	0.00	0	0	0
Urban Low Residential	369.12	2188	0	6329
Urban Medium Residential	33.75	0	505	1070
Urban High Residential	52.09	0	1242	2632
Urban Restricted Residential	45.48	120	0	332
Subtotal	500.44	2308	1747	10364

Mixed Use Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Urban Village Center	0.00	0	0	0
Regional Center	66.23	0	1979	4196
Commercial	34.77	0	966	2049
Neighborhood Commercial	0.00	0	0	0
Low-Intensity Commercial	0.00	0	0	0
Subtotal	101.00	0	2946	6245
Total	601.44	2308	4692	16609



Unincorporated Urban Growth Area
Kingston

Residential Land Supply Capacity

Residential Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Exclude Parcels Unlikely to Develop (-)	Identify Critical Areas (-)	Identify Future Roads/Right of Way Needs (-)	Identify Future Public Facility Needs (-)	Account for Unavailable Lands (-)	Determine Net Acres	Tree Reduction (-)	Calculate Housing Capacity (Units)	Apply Persons per household to calculate population
Redevelopable Subtotal	53.92	577.52	498.22	22.06	3.28	7.15	9.50	37.31	36.90	193	426
Vacant Subtotal	18.17	427.11	368.99	20.97	6.08	4.86	6.23	19.97	19.71	1035	2378
Total	72.09	1004.63	867.21	43.03	9.36	12.01	15.73	57.29	56.60	1228	2804

Mixed Use Capacity											
Redevelopable Subtotal	0.00	80.24	58.89	0.91	0.28	1.05	1.05	15.00	15.00	136	288
Vacant Subtotal	0.00	10.38	0.00	0.72	0.97	0.77	0.77	4.99	4.99	128	272
Total	0.00	90.62	58.89	1.63	1.25	1.83	1.83	19.99	19.99	264	560

Redevelopment Total	53.92	657.76	557.11	22.97	3.55	8.20	10.55	52.31	51.89	329	714
Vacant Total	18.17	437.49	368.99	21.69	7.05	5.64	7.01	24.96	24.70	1163	2650
Total Capacity	72.09	1095.25	915.10	44.66	10.60	13.84	17.56	77.28	76.59	1492	3364

Residential Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Greenbelt Zone	0.00	0	0	0
Urban Cluster Residential	0.00	751	0	1750
Urban Low Residential	26.23	97	0	226
Urban Medium Residential	19.82	0	350	794
Urban High Residential	0.00	0	0	0
Urban Restricted Residential	10.56	30	0	83
Subtotal	56.60	878	350	2804

Mixed Use Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Urban Village Center	14.24	0	57	120
Regional Center	0.00	0	0	0
Commercial	5.75	0	208	440
Neighborhood Commercial	0.00	0	0	0
Low-Intensity Commercial	0.00	0	0	0
Subtotal	19.99	0	264	560
Total	76.59	878	614	3364



Unincorporated Urban Growth Area

Residential Land Supply Capacity

Poulsbo

Residential Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Exclude Parcels Unlikely to Develop (-)	Identify Critical Areas (-)	Identify Future Roads/Right of Way Needs (-)	Identify Future Public Facility Needs (-)	Account for Unavailable Lands (-)	Determine Net Acres	Calculate Housing Capacity (Units)	Apply Persons per household to calculate population
Redevelopable Subtotal	0.00	286.33	114.65	36.92	6.42	24.41	19.53	84.40	335	842
Vacant Subtotal	0.00	44.58	0.00	9.24	7.07	5.65	4.52	18.09	90	227
Total	0.00	330.91	114.65	46.16	32.76	26.21	20.97	90.17	367	922

Redevelopment Total	0.00	286.33	114.65	36.92	6.42	24.41	19.53	84.40	335	842
Vacant Total	0.00	44.58	0.00	9.24	7.07	5.65	4.52	18.09	90	227
Total Capacity	0.00	330.91	114.65	46.16	32.76	26.21	20.97	90.17	367	922

Residential Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Residential Low	102.50	426	0	1069
Residential Medium	0.00	0	0	0
Residential High	0.00	0	0	0
Subtotal	102.50	426	0	1069



Unincorporated Urban Growth Area
Port Orchard

Residential Land Supply Capacity

Residential Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Exclude Parcels Unlikely to Develop (-)	Identify Critical Areas (-)	Identify Future Roads/Right of Way Needs (-)	Identify Future Public Facility Needs (-)	Account for Unavailable Lands (-)	Determine Net Acres	Tree Reduction (-)	Calculate Housing Capacity (Units)	Apply Persons per household to calculate population
Redevelopable Subtotal	321.55	1917.55	1646.33	52.57	19.85	30.31	39.10	129.39	127.63	518	1360
Vacant Subtotal	142.29	213.07	3.75	60.60	24.74	19.79	25.17	79.03	77.95	634	1693
Total	463.84	2130.62	1650.08	113.17	44.59	50.10	64.26	208.42	205.58	1151	3053

Mixed Use Capacity											
Redevelopable Subtotal	82.78	88.49	24.53	16.15	4.21	3.37	3.37	10.70	10.70	244	514
Vacant Subtotal	0.00	31.91	0.00	3.43	2.04	1.63	1.63	4.89	4.89	117	247
Total	82.78	120.40	24.53	19.58	6.25	5.00	5.00	15.59	15.59	360	760

Redevelopment Total	404.33	2006.04	1670.86	68.72	24.06	33.68	42.46	140.09	138.33	761	1874
Vacant Total	142.29	244.98	3.75	64.03	26.77	21.42	26.80	83.92	82.84	751	1940
Total Capacity	546.62	2251.02	1674.61	132.75	50.83	55.10	69.26	224.01	221.17	1512	3814

Residential Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Greenbelt Zone	0.00	0	0	0
Urban Cluster Residential	0.00	0	0	0
Urban Low Residential	176.13	945	0	2608
Urban Medium Residential	24.92	0	191	404
Urban High Residential	0.00	0	0	0
Urban Restricted Residential	4.53	15	0	42
Subtotal	205.58	960	191	3053

Mixed Use Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Urban Village Center	0.00	0	0	0
Regional Center	0.00	0	0	0
Commercial	15.59	0	360	760
Neighborhood Commercial	0.00	0	0	0
Low-Intensity Commercial	0.00	0	0	0
Subtotal	15.59	0	360	760
Total	221.17	960	552	3814



Unincorporated Urban Growth Area
Central Kitsap

Residential Land Supply Capacity

Residential Capacity	Infrastructure Gap Review (Gross Acres)	Define Development Status	Exclude Parcels Unlikely to Develop (-)	Identify Critical Areas (-)	Identify Future Roads/Right of Way Needs (-)	Identify Future Public Facility Needs (-)	Account for Unavailable Lands (-)	Determine Net Acres	Tree Reduction (-)	Calculate Housing Capacity (Units)	Apply Persons per household to calculate population
Redevelopable Subtotal	79.77	3471.58	3031.94	122.35	16.54	41.38	62.28	197.09	194.04	1219	3019
Vacant Subtotal	25.37	406.32	8.76	143.60	39.64	31.71	28.53	154.08	152.11	892	2228
Total	105.14	3877.90	3040.70	265.95	56.18	73.09	90.81	351.16	346.15	2111	5247

Mixed Use Capacity											
Redevelopable Subtotal	0.00	88.81	86.95	0.00	0.07	0.07	0.31	0.94	0.94	343	792
Vacant Subtotal	0.00	4.31	0.00	0.84	0.52	0.42	0.33	1.33	1.33	40	92
Total	0.00	93.12	86.95	0.84	0.59	0.48	0.65	2.28	2.28	383	885

Redevelopment Total	79.77	3560.39	3118.89	122.35	16.61	41.45	62.60	198.03	194.98	1562	3811
Vacant Total	25.37	4100.63	8.76	144.44	40.16	32.13	28.86	155.41	153.44	932	2321
Total Capacity	105.14	3971.02	3127.65	266.79	56.77	73.58	91.46	353.44	348.42	2494	6132

Residential Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Greenbelt Zone	60.66	101	0	258
Urban Cluster Residential	17.35	283	0	724
Urban Low Residential	104.23	598	0	1531
Urban Medium Residential	14.03	0	207	477
Urban High Residential	17.24	0	421	973
Urban Restricted Residential	132.64	501	0	1283
Subtotal	346.15	1483	628	5247

Mixed Use Capacity	Net Acres	Single Family Units	Multi-Family Units	Population Capacity
Urban Village Center	0.00	0	0	0
Regional Center	0.00	0	0	0
Commercial	2.28	0	383	885
Neighborhood Commercial	0.00	0	0	0
Low-Intensity Commercial	0.00	0	0	0
Subtotal	2.28	0	383	885
Total	348.42	1483	1011	6132

ATTACHMENT 4

BEFORE THE GROWTH MANAGEMENT HEARINGS BOARD
CENTRAL PUGET SOUND REGION
STATE OF WASHINGTON

KITSAP ALLIANCE OF PROPERTY OWNERS; WILLIAM M. PALMER; FUTUREWISE; TERRY Y. YAMAMOTO; and YAMAMOTO HYDROSEEDING,

Petitioners,

v.

KITSAP COUNTY,

Respondent.

Case No. 25-3-0005c

FINAL DECISION AND ORDER

SYNOPSIS

Petitioners challenged Kitsap County’s (County) 2024 periodic update of its Comprehensive Plan and development regulations. The Board concluded that the County’s land use element failed to identify sufficient capacity of land for housing for all income groups and make adequate provisions for the existing and projected needs of all economic segments of the community, specifically those at the low, very low, extremely low, and moderate-income levels. The Board also concluded that the land use element failed to include mandatory elements, such as identification of multimodal emergency and evacuation routes, or include certain planning tools as required. The matter was remanded to the County to address these issues.

I. INTRODUCTION

On January 28, 2025, Kitsap Alliance of Property Owners and William M. Palmer (collectively, KAPO) filed a Petition for Review (Petition) challenging certain provisions of Kitsap County's (County) Comprehensive Plan Update adopted by Ordinance No. 637-2024 on December 2, 2024. The Petition was assigned Case No. 25-3-0002. On February 14,

1 2025, Futurewise (Futurewise) filed a Petition challenging provisions of Ordinance No. 637-
2 2024. The Petition was assigned Case No. 25-3-0004. On February 14, 2025, Palmer, Terry
3 Y. Yamamoto and Yamamoto Hydroseeding (collectively, Yamamoto) filed a Petition also
4 challenging provisions of Ordinance No. 637-2024. The Petition was assigned Case No. 25-
5 3-0005. The Board consolidated review under Case No. 25-3-0005c.

6
7 Futurewise challenges the County's periodic update to the County's Comprehensive
8 Plan and development regulation asserting it did not comply with the housing, rural growth,
9 agricultural conservation, and surface and ground water protection requirements of the
10 Growth Management Act (GMA). Futurewise asserts that the County's comprehensive plan
11 failed to identify sufficient capacity of land for housing including housing for all income
12 groups and make adequate provisions for the existing and projected needs of all economic
13 segments.¹ Futurewise also asserts that the Comprehensive Plan violates the GMA and
14 Multicounty Planning Policies (MPPs) by increasing rural development rather than
15 managing and reducing rural growth rates.² Additionally, that the County failed to address
16 climate adaptation and resilience as they do not include multimodal emergency and
17 evacuation routes or other measures to address wildfire risk, nor does it direct growth away
18 from the wildland urban interface or implementation of firewise standards and strategies as
19 required by the GMA.³ Also, that the County failed appropriately to adopt criteria for
20 designation of agricultural lands of long-term significance.⁴ Lastly, Futurewise asserts that
21 the County failed to protect surface and ground water.⁵

22
23
24 The County contends its Comprehensive Plan serves as a guide and is not required
25 to include a level of detail Futurewise requests. That while its Comprehensive Plan shows
26 a housing deficiency, it followed the Washington State Department of Commerce's
27 (Commerce) guidance and has significantly increased capacity. That its growth projections
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¹ Futurewise Prehearing Br. at 2.

² *Id.* at 8.

³ *Id.* at 14.

⁴ *Id.* at 15-16

⁵ *Id.* at 21.

1 are to be resolved over time and that it directed growth towards the urban centers, rather
2 than the rural environment. That Futurewise has misconstrued the County's growth
3 projections, and it is in fact below its targeted rural growth rate. That the County is not
4 required to adopt its transportation elements, which includes the climate change and
5 resiliency element, at this time, and that it otherwise provided the required wildfire measures
6 in other sections of its Ordinance.⁶ That despite Futurewise's conclusion that no agricultural
7 lands review occurred, it considered what agricultural lands of long term significance may
8 be in the County based on the newly adopted criteria and concluded that no additional lands
9 qualified.⁷ Lastly, that it addressed the requirements of the 2018 water legislation then.⁸

11 Petitioners KAPO and Yamamoto have not filed Prehearing Briefs but did file a form
12 of response which is addressed below.

14 II. PROCEDURAL MATTERS

15 KAPO, Palmer, Yamamoto, and Yamamoto Hydroseeding (all represented by
16 Mr. Palmer) failed to file a Prehearing Brief. They did, however, file a document appearing
17 to address the County's assertion they had abandoned their issues and otherwise suggests
18 its Petition constitutes its argument or Prehearing Brief.⁹ The failure of a party to brief an
19 issue constitutes abandonment of the unbriefed issue.¹⁰ Inadequately briefed issues are
20 treated like unbriefed issues.¹¹ That is because, as this Board has previously stated, the
21 burden of proof is on the Petitioner and the Board must review the Petitioner's rationale for
22

23 _____
24 ⁶ Cnty's Prehearing Br. at 22-23.

25 ⁷ *Id.* at 26 (Futurewise cannot challenge an unchanged provision, and that a WAC amendment does not give
rise to a "failure-to-revise" assertion as WAC's are not GMA amendments).

26 ⁸ *Id.* at 32.

27 ⁹ Filed June 16, 2025, as "Response to Kitsap County's Pretrial Motion to Dismiss," which appears to address
an aspect raised in the County's Prehearing Brief and asserts the County "ignores the arguments presented
28 in the original petitions filed by each..." Response to Kitsap Cnty's Mot. to Dismiss at 9. However, a Petition
does not take the place of a Prehearing Brief and alone provides insufficient analysis to warrant review.

29 ¹⁰ WAC 242-03-590(1), (2); see also *Futurewise v. Snohomish Cnty.*, 9 Wn. App. 2d 391, 444 P.3d 1228
(2019); see Cnty's Prehearing Br. at 5 (The County also contends Futurewise abandoned certain portions of
30 its issues). Issues not specifically addressed in this Final Decision and Order are deemed abandoned and
dismissed.

31 ¹¹ *Sky Valley, v. Snohomish Cnty.*, CPSGMHB No. 95-3-0068c (Final Decision and Order, (Mar. 12, 1996) at
32 24-25; *Tupper v. City of Edmonds*, CPSGMHB No. 03-3-0018, Final Decision and Order at 6 (Mar. 22, 2004).

1 its contention and weigh that argument against the government's response.¹² Here, without
2 filing a Prehearing Brief, the County was denied an opportunity to respond and the Board
3 was deprived a comprehensive argument. Accordingly, unbriefed issues are abandoned
4 and dismissed as noted below.

5 The County also asserts Futurewise abandoned portions of their arguments. Each
6 are addressed under their specific issue.¹³
7

8 III. BOARD JURISDICTION

9 The Board finds the Petition for Review was timely filed.¹⁴ The Board also finds the
10 Petitioners have standing to appear before the Board.¹⁵ Lastly, the Board finds it has
11 statutory authority over the subject matter of the Petition.¹⁶
12

13 IV. STANDARD OF REVIEW

14 Comprehensive plans and development regulations, and amendments to them, are
15 presumed valid upon adoption.¹⁷ This presumption creates a high threshold for challengers
16 as the burden is on the Petitioners to demonstrate that any action taken by the local
17 jurisdiction is not in compliance with the GMA.¹⁸ The Board is charged with adjudicating
18 GMA compliance and, when necessary, invalidating noncompliant plans and development
19 regulations.¹⁹ The scope of the Board's review is limited to determining whether a local
20 jurisdiction has achieved compliance with the GMA only with respect to those issues
21 presented in a timely Petition for Review.²⁰ The Board grants deference to local jurisdictions
22 in how they plan for growth, consistent with the requirements of the GMA.²¹ The Board is
23 directed to find compliance unless it determines that the challenged action is clearly
24
25

26 ¹² *Sky Valley*, CPSGMHB No. 95-3-0068c, Final Decision and Order at 23.

27 ¹³ Cnty's Prehearing Br. at 5.

28 ¹⁴ RCW 36.70A.290(2).

29 ¹⁵ RCW 36.70A.280(2)(b).

30 ¹⁶ RCW 36.70A.280(1)(a).

31 ¹⁷ RCW 36.70A.320(1).

32 ¹⁸ RCW 36.70A.320(2).

¹⁹ RCW 36.70A.280, .302.

²⁰ RCW 36.70A.290(1).

²¹ RCW 36.70A.3201.

1 erroneous in view of the entire record before the Board and in light of the goals and
2 requirements of the GMA.²² In order to find the local jurisdictions action clearly erroneous,
3 the Board must be “left with the firm and definite conviction that a mistake has been
4 committed.”²³

5 6 V. ANALYSIS AND DISCUSSION

7 KITSAP ALLIANCE OF PROPERTY OWNERS

8 **Issue No. 1. Did Kitsap County fail to analysis and/or include plan provisions for all**
9 **15-goals found in 36.70A.020 of which Goal No. 6 is listed?**

10
11 Abandoned and dismissed.

12 **Issue No. 2. Did Kitsap County fail to analysis and/ or include plan provisions to**
13 **address Section 3 and Section 16 of the Washington State Constitution and the Fifth**
14 **Amendment to the US Constitution?**

15 Dismissed by earlier Order.²⁴

16 **Issue No. 3. Did Kitsap County fail to be guided by the requirements of**
17 **RCW 36.70A.370.1 - Protection of Private Property, which first requires the state**
18 **attorney general to establish an orderly, consistent process for state and local**
19 **agencies to evaluate proposed regulatory or administrative actions to assure that**
20 **such actions do not result in an unconstitutional taking of private property?**

21 Abandoned and dismissed.

22 **Issue No. 4. Did Kitsap County fail to be guided by an analysis and/or plan provisions**
23 **to address the US Supreme Court's decisions on Noland vs California Coastal**
24 **Commission (1987), Doland vs. City of Tigard (1994), Koontz v. St. Johns River Water**
25 **Management District (2013) and Sheets v. County of El Dorado (2024) prior to the**
26 **adoption of Ordinance Number 637-2024?**

27 Dismissed by earlier Order.²⁵

28
29 _____
30 ²² RCW 36.70A.320(3).

31 ²³ *Dep't of Ecology v. PUD 1*, 121 Wn.2d 179, 201, 849 P.2d 646 (1993).

32 ²⁴ See *Kitsap Alliance of Property Owners, et. al. v. Kitsap County*, GMHB Case No. 25-3-0005c (Order on Motions, Apr. 29, 2025).

²⁵ *Id.*

1 **Issue No. 5. Did Kitsap County fail to analyze the disproportionate cost burden placed**
2 **on property owners for protection of certain elements of the 2 environment that are**
3 **deemed to be of public benefit especially 3 when the public does not share any**
4 **of the cost(s) when it adopted its 2024 Comprehensive Plan Update by Ordinance**
5 **Number 637-2024?**

6 Dismissed by earlier Order.²⁶

7 **Issue No. 6. Did Kitsap County fail to discuss, analysis or include plan provisions to**
8 **address the critique KAPO provided the County of how inclusion of environmental**
9 **requirements for maintaining so-called "functions and values," "Best Available**
10 **Science" and "no net loss" disproportionately affects property owners when 1.**
11 **"Protection" is not defined in either the GMA or in Kitsap County's 2024**
12 **Comprehensive Plan Update, 2. A baseline environmental study has not been**
13 **conducted to determine or measure loss or equity of loss, 3. The Comprehensive**
14 **Plan does not contain a clear definition of "functions and values," and 4. Since the**
15 **GMA defines "environment" as only pertaining to air and water quality without**
16 **inclusion of issues of habitat for fish, mammals or birds when it adopted Ordinance**
17 **Number 637-2024?**

18 Dismissed by earlier Order.²⁷

19 **Issue No. 7. Did Kitsap County fail to discuss, include plan provisions for or even**
20 **consider in their 2024 Comprehensive Plan Update the issue of the supremacy of**
21 **constitutional protections for people owning property in relation to public interest**
22 **provisions for the use thereof or for the limitations that the Plan or the implementing**
23 **ordinances would impose?**

24 Dismissed by earlier Order.²⁸

FUTUREWISE

25 **Issue No. 8. Did the adoption of Ordinance No. 637-2024, the comprehensive plan, the**
26 **Comprehensive Plan Land Use Map, and Title 17 (Zoning), fail to identify sufficient**
27 **capacity of land for housing including housing for all income groups and make**
28 **adequate provisions for the existing and projected needs of all economic segments**
29 **of the community violating RCW 36.70A.020(4), RCW 36.70A.070,**
30 **RCW 36.70A.070(2)(c) or (2)(d), RCW 36.70A.100, RCW 36.70A.130(1) and (5)(a),**

31 ²⁶ *Id.*

32 ²⁷ *Id.*

²⁸ *Id.*

1 **RCW 36.70A.210, RCW 36.70A.290(2), or Kitsap County Countywide Planning Policy**
2 **Appendix F: Housing Allocation Through 2044?**

3 As an initial matter, the County contends Futurewise did not analyze certain portions
4 of this issue.²⁹ Futurewise does not dispute this in its Reply. Issues not specifically
5 addressed below are deemed abandoned.

6 The County's housing analysis demonstrates a 1,179 unit deficiency for households
7 below 80% area median income (AMI), and another 166 units for those between 81-120%
8 AMI which, according to Futurewise, violates the GMA by failing to identify sufficient capacity
9 of land for housing including housing for all income groups and making adequate provisions
10 for the existing and projected needs of all economic segments.³⁰ This deficiency, Futurewise
11 asserts, also creates an inconsistency because Housing Policy 1.3 requires the County
12 "ensure sufficient capacity of land is available to accommodate new construction and
13 redevelopment for housing growth targets as established in this Comprehensive Plan,"
14 along with Housing Policy 2.3 which require the County to "evaluate that available housing
15 types align with the needs of residents across income levels and demographic groups."³¹
16 Futurewise suggests because the County is a higher-cost community, something the County
17 disputes, it needed "... low- and mid-rise wood frame housing types..." to provide affordable
18 housing.³² Futurewise also favors high-rise buildings as a means of providing affordable
19 housing.³³ Futurewise suggests that without plan and zoning capacity for these housing
20 types, lower-income households are effectively excluded from the County.³⁴

21 A local jurisdiction must ensure that, taken collectively, adoption of and amendments
22 to their comprehensive plans and/or development regulations provide sufficient capacity of
23 land suitable for development within their jurisdictions to accommodate their allocated

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28 ²⁹ Cnty's Prehearing Br. at 5 (asserting no analysis of RCW 36.70A.100, .210, .290, and CPP Appendix F).

29 ³⁰ Futurewise Prehearing Br. at 2, (citing RCW 36.70A.020(4), RCW 36.70A.130(1) and (5)(a), and RCW
30 36.70A.320(3)).

31 ³¹ *Id.* at 4-5.

32 ³² *Id.* at 3; see also County's Prehearing Brief at 8 (referencing Table 5 in Section 3.4 of the Housing
Element Technical Analysis in Appendix A and comparing Index 64 pg. 522 and Index 75 pg. 774).

³³ *Id.*

³⁴ Futurewise Prehearing Br. at 4.

1 growth.³⁵ In determining whether the County did so, the Board considers the criteria adopted
2 by Commerce.³⁶ Futurewise asserts this affords Commerce guidance significant legal
3 weight in compliance determinations.³⁷ Perhaps, but ultimately the Board “considers” the
4 guidance, but determines compliance based on the GMA itself.³⁸ Futurewise also asserts
5 that the housing deficit “trigger mandatory implementation requirements.”³⁹ This Board does
6 not read a mandatory implementation requirement, but instead the requirement that a local
7 jurisdiction conduct a number of investigatory undertakings (e.g. document programs and
8 actions needed to achieve housing availability including gaps in local funding, determine
9 barriers such as development regulations, consider placing housing around employment
10 and public transportation, utilize Accessory Dwelling Units (ADU’s), and identify policies that
11 may have resulted in racially disparate treatment, etc.).⁴⁰ Commerce Guidelines supports
12 this and indicate local jurisdictions should review housing production trends to determine if
13 a barrier exists, and then determine the what kinds of barriers exist (e.g. development
14 regulations, process obstacles, land availability, or funding gaps), and then identify and
15 document appropriate programs and actions to overcome each barrier identified.⁴¹ The
16 Board does not read a requirement that the County make zoning changes prior to or
17 concurrent with the adoption of the comprehensive plan to address the County’s housing
18 deficit as claimed by Futurewise.⁴² In fact, Commerce’s guidance states: “It is not required
19 that a jurisdiction implement these programs and actions in advance of adoption of the
20
21
22

23 _____
24 ³⁵ RCW 36.70A.115.

25 ³⁶ Those guidelines are set forth in WAC Chapter 365-196 and are “to provide assistance in interpreting the
26 act, not to add provisions and meanings beyond those intended by the legislature.” WAC 365-196-020(3).
27 See also RCW 36.70A.320(3) (referencing RCW 36.70A.190(4)); Index No. 75 (Wash. State Dept. of
Commerce, Local Govt. Div. Growth Mgmt. Serv., *Book 2: Guidance for Updating Your Housing Element*
28 (2023).

29 ³⁷ Futurewise Prehearing Br. at 3.

30 ³⁸ WAC 365-196-030(3); see also *Strahm v. Snohomish County*, GMHB No. 15-3-0004, (Jan. 19, 2016, Final
31 Decision and Order) at 3.

32 ³⁹ Futurewise Prehearing Br. at 6 (citing RCW 36.70A.070(2)(d)).

⁴⁰ RCW 36.70A.070(2)(d); see also Index No. 64, Ordinance No. 637-2024 – Comprehensive Plan at PDF
pgs. 510-15 (Appendix A: *Final Report Housing Element Technical Analysis* (2024) at title p. – p. 2).

⁴¹ Index 75 at 53, 56.

⁴² Futurewise Prehearing Br. at 5-6.

1 comprehensive plan.”⁴³ However, as the Board notes below, that does not relieve the
2 County of its GMA obligations to accommodate its growth.

3 Futurewise next contends the County’s barrier analysis identified specific regulatory
4 obstacles limiting affordable housing production such as high minimum lot sizes, low
5 maximum densities, restrictive building heights, excessive setbacks, and burdensome
6 parking requirements, but the County failed to implement these or others zoning changes
7 that would sufficiently address the housing deficit by the County’s statutory deadline.⁴⁴ The
8 County indicates it upzoned almost every zone that accommodated low- and mid-rise
9 multifamily housing.⁴⁵ Additionally, structure height limits were increased and parking
10 requirements relaxed which increased capacity.⁴⁶ The County’s actions align with
11 Commerce guidance and did increase capacity.⁴⁷ Futurewise also indicates the County’s
12 reliance on expanding Urban Growth Areas (UGAs) to address housing shortfalls is
13 speculative and only serves to compound the issue, but that would require the County to
14 disregard what also appears to be Commerce’s guidance.⁴⁸

17 As the County explains it, through Office of Financial Management (OFM) projections
18 and the Countywide Planning Policies (CPPs), the unincorporated County was allocated
19 28,825 people between 2022 and 2044.⁴⁹ The County conducted a land capacity analysis
20 which explored four alternatives to address its population allocation.⁵⁰ Ultimately, the County
21 selected Alternative 2 as the base for establishing its Preferred Alternative because it was
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25 ⁴³ Index 75 at 63.

26 ⁴⁴ Futurewise Prehearing Br. at 7.

27 ⁴⁵ Cnty’s Prehearing Br. at 11-12 (noting and increase in the Commercial zone (C) from 10 to 30 dwelling units
28 per acre to 19-60 units per acre; Urban High zones (UH) from 19-30 to 19-60; Urban Medium zone (UM) from
29 10-18 to 10-30; Urban Low zones from 9 to 14 units; and Regional Center zone in Silverdale from 10-30 to
30 19+ (without a maximum)).

31 ⁴⁶ *Id.*

32 ⁴⁷ *Id.* (citing Index 75 at 42).

⁴⁸ Futurewise Prehearing Br. at 7; Index 75 at 42-43.

⁴⁹ Cnty’s Prehearing Br. at 10.

⁵⁰ *Id.* (referencing Index 49 (FEIS) at 96) (Alternative 1 “No Action”, 2 “Compact Growth/Urban Center Focus,”
3 “Dispersed Growth”, and “Preferred Alternative”).

1 the closest to achieving housing targets and directed growth towards urban areas.⁵¹ From
2 there, the County further reduced the surplus population by removing two potential UGA
3 expansions, noting the challenges “right-sizing” UGAs,⁵² and also reduced available land
4 by increasing critical areas buffers and adopting a new tree canopy requirement.⁵³ This
5 resulted in a 2,000 housing-unit deficiency which it addressed by increasing allowable
6 density in urban centers, resulting in a population capacity surplus of 6,067, with a total
7 capacity of 34,892.⁵⁴ Despite this, the County acknowledged, “the low-rise and mid-rise
8 multifamily zones have capacity for 7,175 units, which falls 1,179 [units] short of the 8,354
9 units needed for the 0%-80% income bracket,” and that there a 166-unit shortfall in the
10 moderate density zones for the 80%-120% AMI bracket.⁵⁵ The County says it attempted to
11 address the shortfall by theoretically increasing housing capacity, but each attempt “also
12 increased the population capacity and vice versa; similarly, every attempt to reduce the
13 population overcapacity lowered the ability to meet the housing targets.”⁵⁶

14
15
16 Despite this, the County claims it made a significant step in the right direction by
17 increased capacity by upzoning several zones and increasing structure heights and
18 reduction parking requirements from single and multifamily development.⁵⁷ The County also
19 addressed capacity by creating additional incentives for ADUs in the urban areas, reduced
20 barriers to add another 381 ADUs, and its “pipeline projects” added another 607 units for a
21 total capacity of 7,175 units; this represents more than 5,100 new units (or a 250%
22 increase).⁵⁸ The County also increased capacity in moderately density zones adding 726
23

24
25 ⁵¹ Cnty’s Prehearing Br. at 10.

26 ⁵² *Id.* at 9-10, discussing *Stalheim v. Whatcom County*, GMHB Case No. 10-2-0016c, (Apr. 11, 2011, Final
Decision and Order) at 16; *Thurston County v. WWGMHB*, 164 Wn.2d 329, 352, 190 P.3d 38 (2008).

27 ⁵³ Cnty’s Prehearing Br. at 10.

28 ⁵⁴ *Id.* at 10 (referencing Index 64).

29 ⁵⁵ *Id.* at 11 (referencing Index 64, pg. 530 (Table 5.4)).

30 ⁵⁶ *Id.* at 11.

31 ⁵⁷ *Id.* at 11-12 (noting and increase in the Commercial zone (C) from 10 to 30 dwelling units per acre to 19-
60 units per acre; Urban High zones (UH) from 19-30 to 19-60; Urban Medium zone (UM) from 10-18 to 10-
30; Urban Low zones from 9 to 14 units; and Regional Center zone in Silverdale from 10-30 to 19+ (without
a maximum)).

32 ⁵⁸ Cnty’s Prehearing Br. at 12.

1 units (a 63% increase).⁵⁹

2 The County also consider barriers that may exist such as unclear development
3 regulations and determined a number of actions could be utilized to address its identified
4 barriers: split-zoned site development regulations, moving single family subdivisions and
5 development standards into another title (because that apparently helps with public street
6 and street connectivity requirements imposed by the County), clarifying certain housing
7 definitions, and consolidating review (Performance Based Development permitting with
8 subdivision permitting).⁶⁰ The County also noted, as did Futurewise, that the County's
9 minimum lot sizes created a barrier which the County reduced in some areas or removed
10 altogether in certain other urban zones.⁶¹ The County also increased density, and removed
11 certain height restrictions.⁶² Additionally, the County reduced setbacks, reduced residential
12 parking requirements, and other development requirements.⁶³ The County also considered
13 process obstacles, such as reduced fees for ADU's and expedited permitting processes.⁶⁴
14 The County also considered land availability and environmental constraints to arrive at a
15 potential barrier and consolidated performance based development with subdivisions
16 permitting so review is done at one time.⁶⁵ The County also considered funding gaps, but
17 declined to increase contributions from the general fund (increasing taxes), donate surplus
18 lands, or enact an affordable housing property tax.⁶⁶ Besides increasing taxes or donating
19 land, the County's efforts are specifically identified by Commerce as strategies to address
20 a housing deficiency.⁶⁷

21 The County suggests that numerical targets and capacity may not necessarily align
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26 ⁵⁹ *Id.* at 13.

27 ⁶⁰ See Index 64 at PDF p. 535 (Appendix A: Housing Element Technical Analysis at 22); see also *id.* at 539-
28 40 (Appendix A: Housing Element Technical Analysis at 26-27).

29 ⁶¹ *Id.* at 536 (Appendix A: Housing Element Technical Analysis at 23).

30 ⁶² *Id.*

31 ⁶³ *Id.* at 537 (Appendix A: Housing Element Technical Analysis at 24).

32 ⁶⁴ *Id.* at 538 (Appendix A: Housing Element Technical Analysis at 25).

⁶⁵ *Id.*

⁶⁶ *Id.* at 34-35 (p. 547-48 Cnty's Record).

⁶⁷ Index 75 at 42-43, County's Exhibits p. 781-82.

1 at the Comprehensive Plan phase, and in those situations the jurisdiction may adopt
2 development regulations to help align the numbers *over time*.⁶⁸ The County argues that this
3 is consistent with Commerce Guidance and past Board decisions wherein the Board
4 discussed the inexactitudes inherent in long-range population planning and the unrealistic
5 expectation that a jurisdiction be exactly right in allocating populations.⁶⁹ Futurewise
6 counters that “the County’s citations to pre-HB 1220 Growth Board decisions arguing that
7 capacity analysis is ‘an inexact science’ misapplies outdated legal standards to current
8 mandatory accommodation requirements,” and the County’s reliance on cases decided
9 under the “encourage” standard are inapplicable to the present standard of “plan for and
10 accommodate” growth.⁷⁰ It appears the County also recognizes this standard when it
11 explained that the legislature has “significantly updat[ed] GMA’s Housing Goal and the
12 Housing Element of Comprehensive Plans to require that jurisdictions no longer just
13 encourage but must now plan for and accommodate housing affordable for all economic
14 segments, particularly housing for moderate (>80-120% area median income (AMI)), low
15 (>50-80% AMI), very low (>30-50% AMI), and extremely low (0-30% AMI) income
16 families.”⁷¹ Thus, a local jurisdiction’s comprehensive plan shall include a housing element
17 that makes adequate provisions for existing and projected needs of all economic segments
18 of the community.⁷²

19 While the GMA does not specifically define what it means to make adequate
20 provisions, Merriam-Webster defines “adequate” as “sufficient for a specific need or
21 requirement.” To Commerce, this means jurisdictions “must use the tools at their disposal
22 to create the conditions that make it feasible for developers to build the kinds of housing
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28 ⁶⁸ Cnty’s Prehearing Br. at 9 (emphasis added).

29 ⁶⁹ *Id.* citing *Bremerton v. Kitsap County*, CPSGMHB No. 95-3-0039c Order Rescinding Invalidity at 25-26 (Feb.
30 8, 1999); *Stalheim v. Whatcom County*, GMHB No. 10-2-0016c, FDO at 16 (Apr. 11, 2011).

31 ⁷⁰ Futurewise Reply at 1-2 (quotations in the original) (referencing *Bremerton v. Kitsap County*,

32 ⁷¹ *Id.* at 6, referencing HB 1220 (Laws of 2021, ch. 254), RCW 36.70A.020(4), RCW 36.70A.070, and RCW
36.70A.030(17), (24), (28), and (46)).

⁷² RCW 36.70A.070(2)(c) and (d).

1 needed at all income levels.”⁷³ Here, that need is 1,345 housing units to specifically provide
2 for this community’s most vulnerable members who have been left out of the equation. Thus,
3 it appears to this Board that the Legislature has made it clear, a local jurisdiction can no
4 longer align population allocations “over time.” Instead, local jurisdictions must account for
5 their allocated population either within their Comprehensive Plan or demonstrate how the
6 local jurisdiction’s development regulations will make adequate provisions for the existing
7 and projected needs of all economic segments of the community.⁷⁴ A deficit is no longer
8 permitted to languish unresolved. This deficit, as Futurewise argues, could have been cured
9 by upzoning approximately 24 acers within the Urban Low Residential designation.⁷⁵ The
10 Board, however, proscribes no specific action as the County has broad discretion in how it
11 addresses its population allocation. However, while the County has significantly increased
12 capacity, it nevertheless failed to make adequate provisions as required.⁷⁶ This failure also
13 created an internal inconsistency.
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16 Accordingly, the Board finds the County’s Comprehensive Plan failed to identify
17 sufficient capacity of land for housing for all income groups and make adequate provisions
18 for the existing and projected needs of all economic segments of the community.⁷⁷ Further,
19 that the failure to make adequate provisions created an internal inconsistency and also
20 violated the countywide planning policies.⁷⁸
21

22 **Issue No. 9. Are the urban growth area expansions adopted by Ordinance No. 637-**
23 **2024, the comprehensive plan, the Comprehensive Plan Land Use Map, and Title 17**
24 **(Zoning), inconsistent with the requirement to be sized to accommodate planned**
25 **growth and inconsistent with the requirements for stable urban growth areas**
26 **violating RCW 36.70A.020(1) or (2), RCW 36.70A.070, RCW 36.70A.100, RCW**
27 **36.70A.110, RCW 36.70A.130(1), (3), or (5)(a), RCW 36.70A.210, RCW 36.70A.290(2), or**
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29 ⁷³ Index 75 at 52, Cnty’s Exhibits p. 791.

30 ⁷⁴ RCW 36.70A.070(2)(d).

31 ⁷⁵ Futurewise Reply at 3.

32 ⁷⁶ RCW 36.70A.070(2)(c) and (2)(d).

⁷⁷ RCW 36.70A.020(4), and RCW 36.70A.070(2)(c) and (2)(d).

⁷⁸ RCW 36.70A.070, RCW 36.70A.100, and RCW 36.70A.210.

1 **Multicounty Planning Policies MPP-RGS-4, MPP-RGS-5, MPP-RGS-6, MPP-RGS-12, or**
2 **RGS-Action7?**

3 Abandoned and therefore dismissed.⁷⁹

4
5 **Issue No. 10. Did the adoption of Ordinance No. 637-2024, the comprehensive plan,**
6 **the Comprehensive Plan Land Use Map, and Title 17 (Zoning), manage and reduce**
7 **rural growth rates over time consistent with the Regional Growth Strategy and the**
8 **regional vision to maintain rural landscapes, to protect resource lands, and the**
9 **environment violating RCW 36.70A.020(1), (2), (8), (9), or (10), RCW 36.70A.070, RCW**
10 **36.70A.070(5), RCW 36.70A.100, RCW 36.70A.130(1) and (5)(a), RCW 36.70A.210, RCW**
11 **36.70A.290(2), or Multicounty Planning Policies MPPRGS-4, MPP-RGS-14, or RGS-**
12 **Action-7?**

13 As an initial matter, the County contends Futurewise did not analyze certain aspects
14 of this issue.⁸⁰ Futurewise does not dispute this in its Reply. Issues not specifically
15 addressed below are abandoned.

16 Futurewise contends the Comprehensive Plan violates the GMA's rural growth
17 management requirements because it fails to implement mandated reductions in rural
18 growth rates, lacks concrete measures to achieve the Regional Growth Strategy's rural
19 population growth targets, and includes provisions that maintain rather than reduce rural
20 development capacity.⁸¹ According to Futurewise, increasing rural development rather than
21 reducing it violates the County's obligation under the GMA and the MMP's.⁸² Futurewise
22 contends the County's Buildable Lands Report documents that between 2013 and 2019 the
23 County saw a 29% increase in the rural area which exceeded the Regional Growth Strategy
24 of 8%, and the County's Comprehensive Plan intends to add 4,391 new residents between
25 2022 and 2044, or 15.2% of the County's projected rural growth.⁸³ Thus, Futurewise claims,
26 the County provides for no limited quantifiable targets, enforcement mechanisms, or
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30 ⁷⁹ Futurewise Prehearing Br. at 8.

31 ⁸⁰ Cnty's Prehearing Br. at 5 (asserting no analysis of RCW 36.70A.130(5) and .290).

32 ⁸¹ Futurewise Prehearing Br. at 13.

⁸² *Id.* at 8-9.

⁸³ *Id.* at 10 (citing MPP-RGS-14).

1 monitoring procedures to actually reduce rural growth rates over time.⁸⁴ Futurewise also
2 contends this violates the County obligation to analyze or comply with regional planning
3 requirements.⁸⁵

4 The County counters that Futurewise has misconstrued the County's population
5 growth numbers because the County relies on growth targets beyond the current planning
6 horizon, and that Futurewise's 8% figure is based on the entirety of the County, which
7 includes all cities, unincorporated UGAs, and rural lands.⁸⁶ Using the 2022-2044 planning
8 horizon, the County's rural population is actually 7.65%, and not 15.2% as Futurewise
9 claims, which is below the MPP target and consistent with the MPP's and CPPs.⁸⁷ The
10 County also contends Futurewise ignores the County's consistent downward trend and
11 because the goal is to reduce rural growth rates over time, something the County is
12 achieving it argues.⁸⁸ The County submits Futurewise is not using a proper comparison,
13 and the more accurate assessment would be to compare this update against the County's
14 2016 Comprehensive Plan wherein the County's rural allocation declined from 21.8%
15 compared to current figure of 7.65%.⁸⁹ The County also claims it has further incentivized
16 growth in the urban area and reduce barriers towards that end.⁹⁰

17
18
19 The Board agrees with the County and can see how the use of population numbers
20 beyond the current planning horizon caused confusion. Thus, Futurewise has failed to
21 convince the Board of its position as it appears to this Board that the County's rural growth
22 rate is below 8%. Accordingly, Issue 10 is dismissed.
23

24
25 **Issue No. 11. Did the adoption of Ordinance No. 637-2024, the comprehensive plan,**
26 **the Comprehensive Plan Land Use Map, Title 16 (Land Division and Development),**

27 ⁸⁴ *Id.* at 12.

28 ⁸⁵ *Id.* at 13 (referencing RCW 36.70A.100,.210).

29 ⁸⁶ Cnty's Prehearing Br. at 18.

30 ⁸⁷ *Id.* at 19 (referencing Futurewise's Prehearing Br. at 8, 10).

31 ⁸⁸ *Id.* at 19 (referencing Futurewise's Prehearing Br. at 10; Index 3).

32 ⁸⁹ *Id.* at 20. The County requests this Board take Official Notice of the County's 2016 Comprehensive Plan. The Board will do so pursuant to WAC 242-03-630(4). Likewise for Ordinance 511-2018, though the Board failed to find a citation to that Ordinance within the County's Prehearing Brief.

⁹⁰ *Id.* at 20.

1 and Title 17 (Zoning), include policies and regulations to direct growth away from the
2 Wildland-Urban Interface (WUI) and to implement measures to reduce wildfire ignition
3 and hazards violating RCW 36.70A.020(1), RCW 36.70A.070, RCW 36.70A.070(1), RCW
4 36.70A.100, RCW 36.70A.130(1) and (5)(a), RCW 36.70A.210, RCW 36.70A.290(2), and
5 Multicounty Planning Policy CCAction-4?

6 As an initial matter, the County contends Futurewise did not analyze certain aspects
7 of this issue.⁹¹ Futurewise does not dispute this in its Reply. Issues not specifically
8 addressed below are abandoned.

9 Futurewise asserts the land use element of the County's Comprehensive Plan failed
10 to include mandatory elements, specifically that it did not included planning tools such as
11 adoption of the wildland urban interface code or developing building and maintenance
12 standards consistent with the firewise USA program, that it did not direct growth away from
13 the wildland urban interface (wildfire prone landscapes); and that it did not include
14 multimodal emergency and evacuation routes.⁹² And, initially, that the County failed to adopt
15 a climate change and resiliency element. The County contends it is not yet required to adopt
16 this element until its transportation element is required to be updated.⁹³ Futurewise agrees
17 the transportation element is not yet required to be updated but asserts that does not excuse
18 the County from failing to include all required provisions within its updated land use
19 element.⁹⁴

20
21 The County argues that because the legislature delayed the County's requirement to
22 include climate change and resiliency within its transportation element, it was permitted to
23 delay other similar issues in its land use element.⁹⁵ The Board disagrees. While the County
24 was not required to adopt the climate change and resiliency element, it was required to
25 update its land use element. Under that element, the County was obligated to:
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27

28 ⁹¹ Cnty's Prehearing Br. at 5 (asserting no analysis of RCW 36.70A.020(1); RCW 36.70A.130(1), (5)(a); and
29 RCW 36.70A.290(2)).

⁹² Futurewise Prehearing Br. at 12-14; Futurewise Reply at 6-7.

30 ⁹³ *Id.* at 22 (citing RCW 36.70A.070, 36.70A.095(1)(c), and 36.70A.130(10)) (The County's transportation
31 element is to be updated by December 31, 2029).

⁹⁴ Futurewise Reply at 7.

32 ⁹⁵ Cnty's Prehearing Br. at 22.

1 reduce and mitigate the risk to lives and property posed by wildfires by using
2 land use planning tools, which may include, but are not limited to, adoption of
3 portions or all of the wildland urban interface code developed by the
4 international code council or developing building and maintenance standards
5 consistent with the firewise USA program or similar program designed to
6 reduce wildfire risk, reducing wildfire risks to residential development in high
7 risk areas and the wildland urban interface area, separating human
8 development from wildfire prone landscapes, and protecting existing
9 residential development and infrastructure through community wildfire
10 preparedness and fire adaptation measures.⁹⁶

9 Futurewise asserts the County has not adopted all or portions of the wildland urban interface
10 code or developed building and maintenance standards consistent with the firewise USA
11 program.⁹⁷ The County asserts that it does, and that the inclusion of other climate change
12 policies sufficiently address wildfire risks as required.⁹⁸ Climate Change Policy 1.1 provides:
13

14 Promote and incentivize creation and implementation of Firewise strategies in
15 coordination with County fire districts, the WA Department of Natural
16 Resources, community groups, and landowners in forest and urban interface
17 intermix areas.

18 Thus, the Board is not persuaded by Futurewise’s argument that the County’s
19 Comprehensive Plan has not implemented firewise strategies or similar programming. The
20 County also asserts additional climate change policies and strategies serve as a blueprint
21 for future action that sufficiently address wildfire hazards.⁹⁹ The County directs the Board to
22 Climate Change Policy 1.1 which requires the County to reduce the risks of wildfires
23 generally. And Policy 8.c which require the County to “identify and promote the development
24 of water supplies in wildland and wildland urban interface or intermix areas to increase
25 firefighting capabilities in rural and resource lands.”¹⁰⁰ As well as Climate Change Policy
26 6.2, directing the County to focus new development in areas where exposure to climate
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29 _____
30 ⁹⁶ RCW 36.70A.070(1).
31 ⁹⁷ Futurewise Prehearing Br. at 14; Reply at 6 (referencing RCW 36.70A.070(1)).
32 ⁹⁸ *Id.* at 24-25.
⁹⁹ *Id.* at 25.
¹⁰⁰ Cnty’s Prehearing Br. at 24 (quotation in the original).

1 hazards is low, and Policy 7.1 which ensure construction “within or abutting urban forests
2 occurs in such a way as to protect the forest and the structures against the hazards of
3 wildfire spreading from one to the other.”¹⁰¹ The County also indicates its Goal 11, with a
4 primary focus of creating resilience against wildfire across forest lands and Wildland Urban
5 Interface/intermix areas, adopted policies that that manage growth within the wildland urban
6 interface, implement modern fire protection regulations for all new development in urban
7 interface / intermix areas, and require best management practices and modern fire
8 regulations on existing land development and forest lands.¹⁰² However, these polices do not
9 adopt the wildland urban interface code or portions thereof, nor are they building and
10 maintenance standards consistent with the firewise USA, or similar, program.
11

12 Futurewise claims that the County’s MPP’s also require the County to update its land
13 use element to address wildfire related issues. The County contends the MPPs are
14 insufficient to raise a “failure-to-revise” claim, and that it largely addressed wildfire hazards
15 in the County’s climate change element. However, here, Futurewise has focused on
16 elements that were required to be included in the land use element that are absent.¹⁰³
17 Specifically, that because the County is require to comply with the MPP’s, and the County’s
18 MPPs require the Comprehensive Plan identify multimodal emergency and evacuation
19 routes in its land use element, the County’s land use element is lacking a required
20 element.¹⁰⁴ The County asserts its MPP’s do not require specific routes, but instead
21 “mitigation measures addressing’ wildfire hazards including evacuation routes.”¹⁰⁵ Also that
22 there is no GMA requirement for these routes be set in the Comprehensive Plan or identified
23 at this stage, as the Comprehensive Plan is a blueprint for future action, and that other
24 policies and strategies address wildfire risk on a broader scope.¹⁰⁶ However, MPP CC-
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28 ¹⁰¹ *Id.* at 24.

29 ¹⁰² See Index 64 at 197 (Climate Change Strategy 11.2, 11.a, and 11.b).

30 ¹⁰³ Futurewise Reply at 7 (referencing RCW 36.70A.070(1)).

31 ¹⁰⁴ Futurewise Reply at 7 (referencing Index 1, Puget Sound Regional Council, *Vision 2050: A Plan for the
Central Puget Sound Region*, at 61 (MPP CC-Action-4)).

32 ¹⁰⁵ Cnty’s Prehearing Br. at 23 (quotations in the original).

¹⁰⁶ *Id.* at 23-24.

1 Action 4 indicates, in relevant part, that the County’s Comprehensive Plan “will identify
2 mitigation measures addressing these hazards including multimodal emergency and
3 evacuation routes... .”¹⁰⁷ The County asserts it is consistent with the MPPs because it
4 adopted measures to address wildfires, such as Climate Change Policy 1.3, which:

5
6 ensure emergency evacuation procedures, including safe evacuation routes
7 and arrival destinations exist, are in place, adequate to ensure life-safety, are
8 known and accessible during flooding, wildfires, and other emergencies.

9 Also, Climate Change Strategy 1.i which provides for development of a comprehensive
10 countywide wildfire mitigation and protection strategy, and Climate Change Strategy 1.j
11 which identify key evacuation sites to provide emergency sheltering during mandatory
12 evacuations. While the County these policies address wildfire risk, they do not address
13 multimodal emergency and evacuation routes which are required by MPP CC-Action-4.
14

15 Accordingly, the Board finds the County’s land use element was required to identify
16 multimodal emergency and evacuation routes and did not.¹⁰⁸ Further, that the County’s
17 Comprehensive Plan did not include planning tools such as adoption of portions or all the
18 wildland urban interface code or develop building and maintenance standards consistent
19 with the firewise USA program as required.¹⁰⁹
20

21 **Issue No. 12. Did the adoption of Ordinance No. 637-2024, the comprehensive plan,**
22 **the Comprehensive Plan Land Use Map, and Title 17 (Zoning), violate**
23 **RCW 36.70A.020(8), RCW 36.70A.030(6) and (23), RCW 36.70A.050(1) and (3),**
24 **RCW 36.70A.060(1), RCW 36.70A.070 and (1), RCW 36.70A.100, RCW 36.70A.130(1)**
25 **and (5)(a), RCW 36.70A.170, RCW 36.70A.210, RCW 36.70A.290(2), WAC 365-190-040,**
26 **WAC 365-190-050, the VISION 2050 Regional Growth Strategy and Multicounty**
27 **Planning Policy RGS-Action-7, and Kitsap County Countywide Planning Policy**
28 **Countywide Growth Pattern and Policies R1b and NE-1c because the County failed**
29 **to adopt criteria for the designation of agricultural lands of long-term commercial**
30 **significance that comply with the Growth Management Act and the Minimum**
31 **Guidelines and failed to designate and conserve the agricultural land that meets the**
32 **Growth Management Act definition of agricultural lands of long-term commercial**

¹⁰⁷ Index 1 at 61 (MPP CC-Action-4).
¹⁰⁸ RCW 36.70A.100,.210; Index 1 at 61 (CC-Action-4).
¹⁰⁹ RCW 36.70A.070(1).

1 **significance and Minimum Guidelines criteria including failing to properly zone those**
2 **lands?**

3 As an initial matter, the County asserts Futurewise did not address issues certain
4 aspects of this issue.¹¹⁰ Futurewise does not dispute this in its Reply. Issues not specifically
5 addressed below are deemed abandoned.

6 Futurewise contends the County failed to conduct a comprehensive countywide
7 analysis as required.¹¹¹ Futurewise contends, “because of the amendments to WAC 365-
8 190-040(10)(c) and WAC 365-190-050(1) clarify that a countywide analysis is required to
9 classify, designate and de-designate natural resource lands and the revisions to the long-
10 term commercial significance factors in WAC 365-190-050(3)(c)(i) and WAC 365-190-
11 050(3)(c)(vi) adopted after the last periodic update, [the] County was required to review its
12 decision to not to adopt designation criteria and designate agricultural lands of long-term
13 commercial significance taking these amendments into account.”¹¹² Futurewise asserts this
14 was particularly important because of improvements to the agricultural industry, decrease
15 in what is considered viable agricultural lands, and an increase to the County’s agricultural
16 lands overall warrants review.¹¹³

17 The County contends, first, that review occurred.¹¹⁴ That the County’s general criteria
18 for designation resources lands mirrors the states, and considers soils of statewide
19 significance, but after review the County found no lands met the criteria and they made no
20 changes.¹¹⁵ The County also asserts that the changes were insufficient to allow a failure-to-
21 revise challenge and that the changes involved the Washington Administrative Code and
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28 ¹¹⁰ Cnty’s Prehearing Br. at 5 (referencing RCW 36.70A.030(6), (23); RCW 36.70A.130(1), (5)(a);
RCW 36.70A.290(2)).

29 ¹¹¹ Futurewise Prehearing Br. at 15 (citing RCW 36.70A.130(1)(a), WAC 365-190-040(10)(C), -050(1)).

30 ¹¹² *Id.* at 16 (Futurewise also sees other changed “provisions” to include VISION 2050’s adoption in 2020,
MPP’s and Countywide Planning Policies (i.e. CPP R1b, CPP NE-1c) at 16-17).

31 ¹¹³ *Id.* at 17.

32 ¹¹⁴ Cnty’s Prehearing Br. at 26.

¹¹⁵ *Id.* at 26-28 (referencing Index 64, Index 16).

1 not the GMA.¹¹⁶ Lastly, the County asserts, correctly, that the amendments focused on de-
2 designation of natural resource lands.¹¹⁷

3 The Board agrees with the County that amendments to the WAC do not give rise to
4 a failure-to-revise challenge, but instead only amendments to the GMA.¹¹⁸ Further, the
5 County considered the new soils criteria and determined there we no farmlands eligible to
6 be designated.¹¹⁹ Also, as the County correctly notes, the legislation addressed de-
7 designation of farmland. Thus, the Board cannot find that a definite mistake has been made.
8 Accordingly, Futurewise has failed to meet its burden and Issue 12 is dismissed.
9

10
11 **Issue No. 13. Did the adoption of Ordinance No. 637-2024, the comprehensive plan,**
12 **the Comprehensive Plan Land Use Map, Title 16 (Land Division and Development),**
13 **and Title 17 (Zoning), protect surface and ground water as required by**
14 **RCW 36.70A.020(10), RCW 36.70A.070, RCW 36.70A.070(1), RCW 36.70A.070(5)(c)(iv),**
15 **RCW 36.70A.130(1) and (5)(a), RCW 36.70A.290(2), or RCW 36.70A.590?**

16 Futurewise contends the County's periodic update failed to include provisions that
17 comply with requirements relating to surface and groundwater resources.¹²⁰ The County
18 asserts these are not GMA requirements, that it addressed these requirements in 2018
19 when it adopted Ordinance 551-2018 in direct response to the legislation, and that
20 Futurewise has both failed to meet its burden and attempted to shift the burden to the
21 County.¹²¹ At the Hearing on the Merits, the County also asserted Futurewise was time-
22 barred from raising issues regarding their 2018 Ordinance in this action.¹²² Futurewise
23 asserted the County's record in this matter failed to produce a publication date for the 2018
24 Ordinance, and they were therefore not time-barred from raising it here. Futurewise also
25

26
27 ¹¹⁶ *Id.* (citing *Clallam County v Dry Creek Coalition*, 161 Wn. App. 366, 384-391, 255 P.3d 709 (2011)) ("this
28 holding applies to all the mandatory plan elements listed in former RCW 36.70A.070").

29 ¹¹⁷ *Id.* at 29.

30 ¹¹⁸ *Thurston County v. W. Wash. Growth Mgmt. Hearings Bd.*, 164 Wn.2d 329, 345, 190 P.3d 38 (2008).

31 ¹¹⁹ Index 64; Index 16.

32 ¹²⁰ Futurewise Prehearing Br. at 21 (referencing RCW 36.70A.590).

¹²¹ Cnty's Prehearing Br. at 32-36.

¹²² See WAC 242-03-220(1) ("A petition ... shall be filed with the board within sixty days from the date of
publication by the legislative body...").

1 asserted that the 2018 Ordinance failed to limit any permit-exempt well to five thousand
2 gallons per day as required.¹²³ The Board would not anticipate the Index of Record in this
3 matter to include the publication from a 2018 Ordinance, nor would the County presume to
4 include it as the Issue deals with Ordinance No. 637-2024, and not Ordinance 551-2018.
5 Thus, the Board is not persuaded by Futurewise’s argument regarding the 2018 Ordinance
6 and find issues related to that Ordinance would not be properly before this Board in this
7 matter. Futurewise has not convinced this Board that this Ordinance is clearly erroneous.
8 Accordingly, issue 13 is dismissed.
9

10 **TERRY Y. YAMAMOTO and YAMAMOTO HYDROSEEDING**

11 **Issue No. 14. Did Kitsap County fail to coordinate its planning program activities**
12 **with the City of Port Orchard as required by RCW 36. 70A.100?**
13

14 Abandoned and dismissed.

15 **Issue No. 15. Did Kitsap County fail to be guided by the planning goals set forth in**
16 **RCW 36.70A.100 when it adopted Ordinance Number 637-2024?**

17 Abandoned and dismissed.

18 **Issue No. 16. Did Kitsap County fail to be guided by RCW 36.70A & RCW 36.70A.215**
19 **when it established the size of its or the cities' Urban Growth Areas?**
20

21 Abandoned and dismissed.

22 **Issue No. 17. Did Kitsap County fail to be guided by the provisions of RCW**
23 **36.70A.0740 when it adopted Ordinance Number 637-2024?**

24 Abandoned and dismissed.

25 **VI. ORDER**

26 Based upon review of the Petition for Review, the briefs and exhibits submitted by
27 the parties, the GMA, prior Board orders and case law, having considered the arguments of
28 the parties, and having deliberated on the matter, the Board finds:
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32 ¹²³ Futurewise Reply at 10 (referencing RCW 90.44.050).

- The County’s Comprehensive Plan failed to identify sufficient capacity of land for housing for all income groups and make adequate provisions for the existing and projected needs of all economic segments of the community, in particular for the low, very low, extremely low, and moderate-income levels of the County. This creates an internal inconsistency and violates the countywide planning policies.
- The County’s land use element failed to identify multimodal emergency and evacuation routes and did not include planning tools such as adoption of portions or all of the wildland urban interface code or develop building and maintenance standards consistent with the firewise USA program.
- As to Invalidity: Futurewise, in its Petition, requested invalidity but did not brief it or explain why invalidity may be appropriate in this matter and repeatedly requested remand for compliance.¹²⁴ The Board is delaying consideration of Invalidity and may address it at the time of compliance, if warranted.

Item	Date Due
Compliance Due	February 4, 2026
Compliance Report/Statement of Actions Taken to Comply and Index to Compliance Record	February 18, 2026
Objections to a Finding of Compliance	March 4, 2026
Response to Objections	March 16, 2026
Compliance Hearing Zoom link to be provided at a later date.	March 23, 2026 1:00 p.m.

Length of Briefs – A brief of 15 pages or longer shall have a table of exhibits and a table of authorities.¹²⁵ **Compliance Report/Statement of Actions Taken to Comply**


¹²⁴ Futurewise PHB at 4; Futurewise Reply at 3-4, 6, 12.

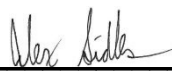
¹²⁵ WAC 242-03-590(3).

1 shall be limited to 25 pages, 35 pages for Objections to Finding of Compliance, and
2 10 pages for the Response to Objections.

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4 SO ORDERED this 8th day of August, 2025.

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8 Mark McClain, Presiding

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12 Rick Eichstaedt, Board Chair

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16 Alex Sidles, Board Member

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27 **Note: This is a final decision and order of the Growth Management Hearings Board**
28 **issued pursuant to RCW 36.70A.300.¹²⁶**

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30 _____
31 ¹²⁶ A party aggrieved by a final decision of the Board may appeal the decision to Superior Court within thirty
32 days as provided in RCW 34.05.514; RCW 36.01.050. See also RCW 36.70A.300(5); WAC 242-03-970. It is
incumbent upon the parties to review all applicable statutes and rules. The staff of the Growth Management
Hearings Board is not authorized to provide legal advice.

ATTACHMENT 5

BEFORE THE GROWTH MANAGEMENT HEARINGS BOARD
CENTRAL PUGET SOUND REGION
STATE OF WASHINGTON

KITSAP ALLIANCE OF PROPERTY OWNERS;
WILLIAM M. PALMER;
FUTUREWISE; TERRY Y. YAMAMOTO; and
YAMAMOTO HYDROSEEDING,

Case No. 25-3-0005c

**ORDER GRANTING EXTENSION OF
COMPLIANCE SCHEDULE**

Petitioners,

v.

KITSAP COUNTY,

Respondent,

I. EXTENSION

This matter comes before the Board on the Kitsap’s County’s Motion for Compliance Extension filed on November 12, 2025, requesting an extension to June 30, 2026 to bring its housing capacity in line with the housing targets. Futurewise supports the request.

The Board, through the Presiding Officer, is authorized to adjust the compliance schedule pursuant to RCW 36.70A.330. Because Kitsap County has acted diligently and because Futurewise supports this request, the Board finds good cause to grant the motion.

Accordingly, the motion of Petitioners for a an extension is granted.

The Board requests a status report from the Parties by July 14, 2026, which may be filed individually or jointly.

II. AMENDED CASE SCHEDULE

The schedule below will be in effect unless modified by a subsequent order:

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Item	Date Due
Compliance Due	June 30, 2026
Compliance Report/Statement of Actions Taken to Comply and Index to Compliance Record	July 14, 2026
Objections to a Finding of Compliance	July 28, 2026
Response to Objections	August 7, 2026
Telephonic Compliance Hearing Zoom link to be provided at later date.	August 14, 2026 at 1:00 p.m.

DATED this 19th day of November, 2025.



Mark McClain, Presiding Officer

Local Comprehensive Plans Certification Report Kitsap County Comprehensive Plan

August 28, 2025



The Puget Sound Regional Council conducted a certification review of the Kitsap County comprehensive plan. Kitsap County adopted its 2024 comprehensive plan update on December 2, 2024. PSRC staff provided comments on the draft plan in February 2024 to inform the final plan adopted by the county.

This document is organized into two primary parts: a statement of certification and any applicable conditions to certification; and a discussion of conformity with the Growth Management Act and consistency with VISION 2050 by topic area.

Certification Action

The Puget Sound Regional Council conditionally certifies that the transportation-related provisions in the Kitsap County 2024 comprehensive plan conform to the Growth Management Act and are substantially consistent with multicounty planning policies and the Regional Transportation Plan.

Conditional status is in place until Kitsap County updates its comprehensive plan to achieve compliance related to the plan's appeal to the Growth Management Hearings Board (GMHB) and addresses other identified conditions. The county acknowledges this and commits to addressing the conditions according to the following schedule:

1. Board of Commissioners adoption of a work plan to address the conditions identified in the certification report by November 30, 2025.
2. Submission of a draft amended comprehensive plan and supporting documents that address the conditions to PSRC for review and comment in advance of adoption.
3. Once the conditions are adequately addressed, submission of the adopted amended comprehensive plan and supporting documents by June 30, 2026, for review and certification by PSRC.

Conditions for full certification are described in more detail in the body of this report. Specifically, conditions related to the updated land use and housing element information are described on page 4. A conditionally certified plan will revert to "not certified" status if the jurisdiction fails to meet any of the conditions.



Within the central Puget Sound region, local governments and PSRC have worked together to develop an overall process for reviewing and certifying local, countywide, regional center, and long-range transit plans.¹ Transportation-related provisions that are key for certification are based on RCW 47.80.026 and the Growth Management Act (RCW 36.70A). This report may recommend additional work to fully address the requirements of the Growth Management Act, VISION 2050, or the Regional Transportation Plan, although such revisions may not be strictly required for certification. Jurisdictions are encouraged to address those items during upcoming comprehensive plan updates and other planning efforts.

Conformity with Growth Management Act Transportation Planning Requirements and Consistency with Regional Plans and Policies

OVERVIEW

This section discusses conformity with the Growth Management Act (RCW 36.70A.070(6)) and the transportation-related requirements for local comprehensive plans. It also discusses consistency with the adopted multicounty planning policies (established regional guidelines and principles under RCW 47.80.026) adopted in VISION 2050 and the Regional Transportation Plan. In addition to the multicounty planning policies, VISION 2050 contains a regional growth strategy with a preferred distribution of the region's residential and employment growth, as well as several implementation actions for local governments to carry out. Each policy area addressed in VISION 2050 is discussed in turn below. More information about the requirement to review and certify local plans is provided in the [Adopted Policy and Plan Review Process](#).

Plans are reviewed using PSRC's [VISION 2050 Consistency Tool](#). This report documents where the plan meets requirements, highlights outstanding provisions of the plan, and identifies where additional work is needed to fully address VISION 2050, the Regional Transportation Plan, or Growth Management Act planning requirements. This section is organized by the sections in VISION 2050. While this may align with plan elements, many of these concepts may be addressed in various parts of local comprehensive plans.

¹ The certification requirement in the Growth Management Act is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC's Interlocal Agreement, Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council's Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in [VISION 2050: Implementation](#).



Regional Collaboration

Scope of Review

The Growth Management Act (RCW 36.70A.070(6)) and VISION 2050 call for local comprehensive plans to:

- **Coordinate** with other jurisdictions, agencies, tribes, ports, military installations, and special purpose districts.
- Prioritize **access to opportunity** for people of color, people with low incomes, and historically underserved communities.
- Address opportunities and challenges related to **military installations** when applicable.
- Prioritize investments in **centers**.
- Explore **funding sources** and fiscal tools to meet infrastructure and other needs.

Certification Findings

The Kitsap County comprehensive plan effectively addresses regional collaboration policies in VISION 2050. The plan includes policies to collaborate with jurisdictions, agencies, service providers and other organizations. Policies in the plan support equity in planning and public engagement, including exploring the use of racial equity assessment tools to evaluate development proposals. The plan includes a land acknowledgement and policies to work with Tribes on development proposals that may have impacts to cultural and historic resources, identify joint areas of interest with Tribes, and work with Tribes on a variety of housing strategies, including residential displacement.

Regional Growth Strategy

Scope of Review

VISION 2050 calls for local comprehensive plans to:

- Incorporate **housing and employment targets**.
- Use **land use assumptions** substantially consistent with countywide growth targets.
- Demonstrate sufficient zoned **development capacity** to accommodate targets.
- Use consistent **land use assumptions** throughout plan.
- Maintain a **stable urban growth area** with densities that support the Regional Growth Strategy.
- Support growth in designated **centers and high-capacity transit station areas**.
- Manage and reduce **rural growth** and protect natural resource lands.

Certification Findings

The Kitsap County comprehensive plan effectively addresses many of the Regional Growth Strategy policies in VISION 2050. The plan includes adopted countywide targets for both



urban and rural areas. The plan focuses growth in the urban growth area, particularly in the Silverdale regional center and unincorporated areas served by high-capacity transit. The county made notable changes to development regulations to plan for more multifamily housing in this update, more than tripling the overall capacity for multifamily housing in the unincorporated area. Residential heights and densities were increased in all urban residential and commercial zones, paired with other changes such as reduced or eliminated lots size minimums, setbacks and parking requirements.

CONDITIONS FOR CERTIFICATION

Kitsap County will address the following provisions of the Growth Management Act and VISION 2050 in order to maintain certified status:

- **Update plan and development regulations to provide sufficient housing capacity for all economic segments and address other Growth Management Hearings Board compliance requirements.** The Growth Management Act (RCW 36.70A.070(2)) requires that the housing element document sufficient capacity for moderate, low, very low, and extremely low-income households and to make adequate provisions for these needs within the community. The adopted plan documents that the county does not have capacity to accommodate its housing need allocations, in particular needs below 80% of the Area Median Income. The county will update the plan to provide capacity for its allocated housing needs and adopt adequate provisions. The county should resolve compliance issues consistent with Growth Management Hearings Board direction.
- **Update plan and development regulations to provide sufficient employment capacity.** The Growth Management Act (RCW 36.70A.115) requires that the plan document sufficient capacity to accommodate allocated employment growth. The county's plan shows a deficit of employment capacity countywide and in most individual urban unincorporated areas, including the Silverdale regional center. The county will amend the plan to demonstrate capacity for the employment growth targets.
- **Include required air quality policy.** Transportation plans are required to include policies that promote the reduction of air quality pollutants (WAC 173-420-080 and MPP-En-22). The Transportation element will be amended to include a policy to ensure all federal and state air quality standards are met and reduce emissions of air toxics and greenhouse gases.

The county should address the following comments in future updates to the plan:

- PSRC will complete an in-depth review of regional centers in 2025. PSRC's [Regional Centers Framework](#) requires adopted center plans for regional growth centers. The county has completed the Silverdale Subarea Plan element and is continuing to prepare a new subarea plan and design standards for the center. The county should work to finalize this plan to address all aspects of the Regional Centers Framework.
- The rural growth targets reflect a commitment to reduce the rate of rural growth, and the county is commended for work to date to address rural growth. Managing rural growth consistent with the Regional Growth Strategy will be a long-term effort. The county should continue to identify strategies, tools and development regulations to help reduce rural growth consistent with the Regional Growth Strategy.



Environment

Scope of Review

VISION 2050 calls for local comprehensive plans to:

- Ensure **air quality standards** are met and reduce emissions of air toxics and greenhouse gases.
- Protect **critical areas and habitat** through coordination and environmental stewardship.
- Plan for **park, trail, and open space** resources and needs.
- Protect and enhance **tree canopy and native vegetation**.
- Protect and restore **water quality**, including actions to restore shorelines and estuaries, remove fish-passage barriers, reduce toxic products, and manage stormwater.
- Ensure **access to healthy environments** for all residents, prioritizing the reduction of impacts for vulnerable residents.

Certification Findings

The Kitsap County comprehensive plan effectively addresses the environmental policies in VISION 2050. The plan includes policies to conserve habitat, enhance urban tree canopy and coordinate ecosystem recovery strategies with Tribal, federal, state, local jurisdictions and watershed groups. The plan includes policies to reduce health impacts to vulnerable populations that are disproportionately affected by noise, air pollution and other environmental hazards. The plan includes policies to treat natural resources as essential assets, educate residents and businesses about the function and benefits of a healthy ecosystem, and work with Tribes and other partners to restore aquatic ecosystems by removing fish passage and migration barriers.

Climate Change

Scope of Review

VISION 2050 calls for local comprehensive plans to:

- Reduce **greenhouse gas emissions** in support of state, regional, and local reductions goals.
- Protect and restore natural resources that **sequester and store carbon**.
- Address impacts to **vulnerable populations** that have been or will be impacted by climate change.
- Retrofit **existing buildings** to reduce building energy use.
- Increase **resilience** by identifying and addressing the impacts of climate change and natural hazards.
- Address **rising sea levels** by siting and planning for relocation out of the floodplain.



Certification Findings

The Kitsap County comprehensive plan effectively addresses the climate change policies in VISION 2050. The plan includes a Climate Change element with policies to reduce greenhouse gas emissions and advance community resilience to the impacts of climate change. The plan supports the reduction of greenhouse gas emissions consistent with regional goals and incorporates information from the countywide emissions inventory. The plan includes a variety of policies and strategies to reduce emissions, decarbonize the transportation system and prepare for hazards due to climate change.

The county should address the following comment in future updates to the plan:

- The county has made important progress on addressing climate change in the comprehensive plan. The Department of Commerce plans to release final guidance on climate planning consistent with House Bill 1181 in 2025, which will apply to the implementation progress report for jurisdictions in the Puget Sound region. The county should be aware of this upcoming deadline and monitor whether the plan's current state reflects the new requirements.

Land Use/Development Patterns

Scope of Review

VISION 2050 calls for local comprehensive plans to:

- Build **thriving urban communities** through inclusive engagement.
- Support **centers** as connections to opportunity.
- Address **healthy environment**, physical activity and well-being, and safety, while reducing disparities.
- Support **annexation and incorporation** by planning for phased growth of communities.
- Preserve **rural areas and natural resource lands**.
- Evaluate potential **residential and commercial displacement** and mitigate impacts.
- Limit **incompatible uses** adjacent to military lands, industrial centers, and tribal reservation lands.

Certification Findings

The Kitsap County comprehensive plan effectively addresses the land use and development patterns policies in VISION 2050. The plan includes policies addressing the urban growth area, centers and rural areas. The plan supports the GMA goals to annex or incorporate urban growth areas through strategies such as working with cities to develop annexation agreements, creating a program to assess all stages of the annexation/incorporation process, and evaluating future opportunities to remove urban unincorporated areas that are unlikely to annex. The plan recognizes the importance of military installations to the county and includes policies to discourage the siting of incompatible uses near bases. The plan also



includes policies to provide for quality of life, including planning for open space amenities within the urban growth area, planning for an expanded trail network, and promoting access to healthy food.

Housing

Scope of Review

The Growth Management Act (RCW 36.70A.070) and VISION 2050 call for local comprehensive plans to:

- Provide an **inventory and analysis** of existing housing and housing needs at each income level.
- Document **sufficient land capacity** to accommodate housing for all income levels and emergency shelters.
- Identify **actions** to provide housing for all income levels.
- Identify and address **racially disparate impacts, displacement, or exclusion** in housing.
- Expand housing capacity for **moderate-density housing**.
- Promote **jobs-housing balance**.
- Support the **development and preservation of affordable housing** by considering inclusionary and incentive zoning and promoting affordable housing near high-capacity transit.
- Promote **homeownership** opportunities.

Certification Findings

The Kitsap County comprehensive plan effectively addresses the housing policy topics in VISION 2050. The plan documents capacity to accommodate the county's allocated share of emergency housing in the unincorporated area. The plan provides supporting data and analysis on racially disparate impacts, exclusion, and displacement and includes analysis of housing availability and affordability. The plan includes strategies to increase affordable housing, such as voluntary inclusionary zoning, Multifamily Tax Exemption, improved permit review and additional opportunities to develop a variety of housing types.

The county should address the following comments in future updates to the plan:

- The plan documents a deficit of capacity for housing and must be amended to provide capacity for allocated housing needs. More information on applicable conditions is provided under the Housing section on p. 4 of this report.
- The region is facing a housing crisis, and jurisdictions should act with urgency to address the housing needs of all residents. PSRC encourages the county to continue to work with regional partners to monitor housing conditions, to implement housing strategies and to amend the plan periodically to adjust to changing conditions.



Economy

Scope of Review

VISION 2050 calls for local comprehensive plans to:

- Identify and enhance **industry clusters**, including those that provide goods and services for export.
- Support retention and recruitment of **family wage jobs** and small businesses that are **locally, women-, and minority-owned**.
- Develop a **range of employment opportunities** to create a closer balance between jobs and housing.
- Address and prevent potential **physical, economic, and cultural displacement** of existing businesses.
- Expand **access to opportunity** and remove barriers for disconnected communities.
- Recognize and empower the contributions of the region's **culturally and ethnically diverse communities**.

Certification Findings

The Kitsap County comprehensive plan effectively addresses the economy policies in VISION 2050. The Economic Development element includes strategies to support workforce development programs, promote high-quality education and increase broadband offerings, particularly access and affordability for underserved residents. The plan seeks to provide infrastructure and land for industrial uses and bolster maritime and health care industries to become larger economic clusters. The plan also recognizes the role of U.S. Naval operations in the county's economy and identifying opportunities to leverage naval investments.



Transportation

Scope of Review

The Growth Management Act (RCW 36.70A.070(6)) requires local comprehensive plans to:

- Use **internally consistent land use assumptions** and forecasts of travel demand and that are consistent with growth targets.
- Provide **inventories of existing facilities**, and level-of-service standards and concurrency provisions that address multiple modes of travel, planned land uses and densities, and state highways.
- Include a **multiyear financing plan** and reassessment strategy to address potential funding shortfalls.
- Direct **demand management**, including programs to implement the Commute Trip Reduction Act.
- Plan for **pedestrians and bicycles**, including capital investments, education, and safety.
- Discourage **incompatible uses adjacent to airports**.
- Address **air quality** and the reduction of pollutants consistent with WAC 173-420-080.

VISION 2050 also calls for local comprehensive plans to:

- Plan for **system maintenance, safety and emergency management**.
- Support the **Regional Growth Strategy**.
- Provide **alternatives to driving alone**.
- Plan facilities and services for **special needs transportation**.
- Avoid the creation of new and expanded facilities in **rural areas**.
- Identify **racial and social equity** as a core objective when implementing transportation projects.
- Protect the **environment** and reduce stormwater pollution.

Certification Findings

The Kitsap County comprehensive plan effectively addresses the transportation planning requirements of the Growth Management Act and the transportation policies in VISION 2050. The Transportation element includes policies to reduce vehicle miles traveled per capita and to encourage walk, bike, transit, and other strategies to manage transportation demand. The plan includes policies to use complete streets system design approaches within urban growth areas, address resilience to natural and human-caused hazards through project design and operations, and coordinate with school districts to identify and address transportation safety concerns near schools.

The county should address the following comments in future updates to the plan:

- The plan does not include a policy about meeting air quality standards. More information on applicable conditions is provided on p. 4 of this report.



- Transportation facility inventories and supporting data for the Transportation element were included in the Final Environmental Impact Statement but were not included in an adopted portion of the plan. The county should consolidate and adopt required technical information for the Transportation element to ensure the plan's supporting information is clearly documented and easily accessible.
- VISION 2050 calls for multimodal level of service standards, and the Growth Management Act will also require these standards by 2029 (MPP-DP-52- 53). The county includes many policies supportive of walking, biking and transit, and the county should work to develop policies, standards, and regulatory approaches that incorporate multiple travel modes. PSRC's [Transportation Element Guide](#) provides minimum standards for addressing multimodal level of service standards. Additional guidance may be available in the future to refine adopted standards.

Public Services

Scope of Review

VISION 2050 calls for local comprehensive plans to:

- Promote **coordinated and efficient** use of public services.
- Protect **water quality** by serving urban development with sewer systems and replacing failing septic systems.
- Consider the **impacts of climate change on public facilities** and promote renewable energy.
- Promote **affordable and equitable access to public services**, especially for underserved communities.
- Promote working with school districts on **school siting and design** to support safe, walkable access.

Certification Findings

The Kitsap County comprehensive plan effectively addresses the public services policies in VISION 2050. The plan promotes coordinated and efficient use of public services and prioritizes public facilities and services in the urban growth area to encourage infill development. The Capital Facilities and Utilities element underscores the county's focus on climate by supporting renewable energy incentives, evaluating how climate hazards change the life span for facilities and equipment, and supporting green building and retrofit of public buildings.

Conclusion and Next Steps

PSRC found the Kitsap County comprehensive plan is substantially consistent with the transportation-related provisions of the Growth Management Act, VISION 2050 and the Regional Transportation Plan, provided additional amendments are incorporated into the comprehensive plan. This report identifies conditions to ensure full consistency.



PSRC encourages the county to address areas identified for additional work in upcoming plan updates and other planning efforts. These may be areas where additional work would make the plan more consistent with the Growth Management Act or VISION 2050 and areas that may be necessary to address prior to the 2029 Growth Management Act Implementation Progress Report.

PSRC is available to provide assistance with future plan updates. Find additional planning resources on [PSRC's Plan Review webpage](#). If the county has questions or needs additional information, please contact Liz Underwood-Bultmann at 206-464-6174 or LUnderwood-Bultmann@psrc.org.

DRAFT

