

Comprehensive Plan Final Draft Documents
Public Comments Received Through 10/29/2024

	Public Comments Received Through	Name	Email	Category	Sub Category	Comment	Attachment
1	8/8/2024	Ron Cleaver Jr.	ron@rdcjengineer.com	Code	Tree Code	<p>To whom it may concern,</p> <p>My two cents on trees in urban areas; We don't need any codes covering trees in urban areas.</p> <p>Tree protection policies directly impact housing and general development costs. And because they are spatially oriented, they affect costs directly and proportionately.</p> <p>If we were in the middle of a housing crisis, tree protection policies would be the first thing government agencies should dump to promote lower cost development.</p>	
2	8/8/2024	Frances Sholl	fuguefran@hotmail.com	Code	Tree Code	Finally. Please be as aggressive as possible to keep trees already participating in our ecosystem. And lately construction areas appear to be retaining the site's soil. I hope what I've been seeing is a recognition of the value in this dirt.	
3	8/5/2024	Skokomish Tribe (Susan Devine)	sdevine@parame-trix.com	Land Use Reclassification	Change of Request	Please see attached the revised property rezone request for Skokomish County parcels in South Kitsap County, WA, for consideration during the Comprehensive Plan Update.	LINK TO ATTACHMENT
4	8/23/2024	City of Port Orchard (Nicholas Bond)	nbond@portorchardwa.gov	Land Use Reclassification	Letter of Support	<p>Eric,</p> <p>Please see the attached letter to supplement my previous letter concerning proposed UGA amendment #79. The previous letter is also attached for reference. I have copied Mark Goldberg on this email as he requested that I clarify Port Orchard's support for an alternate UM designation.</p>	LINK TO ATTACHMENT
5	8/24/2024	Micah Stephenson	N/A (written comment)	General		See Attached	LINK TO ATTACHMENT
6	9/1/2024	J. Conrad Lampan	pastor@thehighway.us	Code	Exception to Min. Density	<p>Dear Ms. Rolfes, Mr. Poff et al,</p> <p>We received the information below regarding the final draft for the Comprehensive Plan. Thank you.</p> <p>We check the information, draft/s, etc., however, although we see many changes related to the policies the County wishes to apply, we failed to see any modification or update with regard with title 17.105.010 Director authority to issue administrative decisions, which has been the roadblock to our church needs.</p> <p>In fact the above mentioned title/section does not even appear in the drafts or final drafts, which make us think that the modification/update to the exceptions might actually have not been considered at all.</p> <p>I would like to request if you could respond and tell us if we can expect said title to be modified, as we suggested and requested, simply because without that, any other update modification will not even apply to our situation, as explained repeatedly in writing and in person. In reality, the update to density requirements further complicate our church situation, and needs.</p> <p>We then request that you please tell us, in no uncertain terms if the wording "except density" remains unchanged in Title 17.105.010 Director authority to issue administrative decisions, or if it will be changed to reflect flexibility in special cases like the one we presented to the Board of Commissioners.</p>	

7	9/5/2024	Cagdas Dirik	cagdasdirik@protonmail.com	General		<p>Hi,</p> <p>I am a resident from Indianola WA and I have been going through the Comprehensive Draft Plan.</p> <p>I would like to get access to population estimates since the plan is calling for accommodating growth through increased multifamily and attached housing in new and existing urban neighborhoods and promotion of dense multifamily housing in Silverdale, Kingston, and the McWilliams areas.</p> <p>Could you please point me data which justifies the growth estimates?</p> <p>Population estimates have been discussed within North Kitsap School District - both for 2023 Bond and 2024 Levy. Surprisingly North Kitsap School District's population studies estimates reduced student population - opposite of what the comprehensive plan is projecting.</p> <p>Also I cannot find projected impact on schools, police force, fire department needs, and public health services. Could you please guide me to the relevant section of the report addressing community impact of this projected growth?</p> <p>Thank you.</p>	
8	9/6/2024	Clinton Bergeron	goldleaf2005@gmail.com	Code	Tree Code	<p>I am upset that this Tree Canopy Requirement (Zoning #17.495) was adopted by Kitsap County. I own 2.5 acres off of Illahee Road and have been working for five years to get an SDAP. My plan was to build 14 houses there, but it's been so long without approval to move forward that my financial situation has changed. Between this project and another one, that is on year 3 with no SDAP, the county has basically put me out of business.</p> <p>Now I am learning that after five years and hundreds of thousands of dollars spent that the county has devalued my property with this ordinance. I am trying to sell the property to a larger builder and they are baulking at the Tree Canopy Requirements.</p> <p>I have heard that the KBA (who I used to be a member of) has also voiced their objection to this ordinance.</p> <p>Please, Please, Please vote to remove this Tree Canopy Requirements.</p> <p>Please email me back so I know all three of the commissioners got my email. Thanks</p>	
9	9/12/2024	David Smith	smithhouse4@comcast.net	Code	Open Space / PBD	<p>Ian and all,</p> <p>The open space requirements in the attached comp. plan draft need further revision as follows:</p> <p>GENERAL OPEN SPACE: Current County code requires 15% open space of the gross area of the property to be developed, not including critical areas and their buffers. However, the attached draft states that open space can include critical areas and their buffers. I suggest the following revisions to clarify the 15% open space requirement.</p> <ol style="list-style-type: none"> 1. 15% open space should be based upon only the net "buildable area" of the property and the remaining property can be required to be in a dedicated conservation easement. This is a necessary requirement for properties that have substantial critical areas and associated buffers as 15% of the gross area for open space will substantially reduce the buildable area if all of the 15% open space must be located in the buildable area. 2. 5% required "recreational" area of the open space should also be based upon the net buildable area and not 5% of the gross area of the property for the same reasons as stated above. 	
10	9/12/2024	Beverly Parsons	beverlyaparsons@gmail.com	General	Vision Statement	See Attached	LINK TO ATTACHMENT

11	9/16/2024	Ed Mullaney	edmullaney@ymail.com	Code	Tree Code	<p>I am writing this as a public member.</p> <p>In the last Comp Plan update released last month include a draft of tree canopy regulations to Chapter 17.495 of Title 17 -Zoning. I take exception to the proposed revisions to Section 17.495.050 "Replacement Tree Specifications" which article C.3.b is deleted . This article as was written, identified acceptable native species tree to be used as replacement trees.</p> <p>Article C.3.b as revised, provides for non-native replacement trees up to 35% of the total replacement trees UNLESS approved by the Director. This places the review process as an administrative decision without any public review or comments. This should not be the case for such critical decision affecting our environment.</p> <p>The effort of replacement trees should include the native species trees as was identified as Section 17.495.000 "Tree Species Selections" and this Section be included in the final draft.</p>	
12	9/17/2024	Jered DelPalacio	thegenxpro@yahoo.com	General		<p>Dear county officials,</p> <p>Please stop allowing development without building future infrastructure first. We do not have wide enough roads, not enough gas stations, not enough grocery stores, and a shortage of high schools in port orchard. Additionally I am against the tax payer fitting the bill for infrastructure, that is the responsibility of builder for all the apartments and houses being developed. Rezoning will be detrimental to the health of the city of Port Orchard.</p>	
13	9/19/2024	Rhonda Peacock	shorelinelinesolutions@gmail.com	Code	Shoreline Master Program - Cable Lifts	<p>Hello Planners!</p> <p>We are experiencing a complete road block in obtaining a permit to construct a cable lift for our client in Kitsap County. Currently, the SMP does not include cable lifts. DCD has been applying the code for permitting trams to cable lifts:</p> <p>22.400.120 Vegetation conservation buffers.</p> <p>D. Other Uses and Modifications in Vegetation Conservation Buffers.</p> <p>d. Trams. Trams may be permitted, subject to the permitting requirements of Chapter 22.500. Trams are not considered appurtenances under this section. They are prohibited in the aquatic and natural shoreline environment designations. The following development standards apply:</p> <p>i. Tram landings may not exceed one hundred square feet each.</p> <p>ii. The width of a clearing for a tram shall be a maximum of five feet on either side of the tram, with a maximum clearing corridor of fifteen feet.</p> <p>iii. The installation of a tram shall be limited only to geologically hazardous areas as defined in Chapter 19.400 and subject to “special studies” as outlined in Section 22.700.120.</p> <p>iv. Mitigation sequencing must be used to avoid, minimize, and compensate for any impacts; enhancement of shoreline buffer vegetation will be required. See Section 22.700.140, Shoreline mitigation plan, for guidance on minimum submittal requirements.</p> <p>This code has sufficed when the cable lift platforms have met the 100 square feet requirement. However, not all cable lift platforms can be designed safely to fall within these parameters. Our applicant, James & Judy Childs (parcel 32701-2-025-202; 21-05341 SSDP) has a high bluff property and engineered safety parameters require the upper anchor structure be larger than 100 square feet.</p> <p>After meetings with Kitsap County planners the determination was the only way to move forward with cable lift projects where the structure is larger than 100 square feet is to change the code to allow cable lifts to be categorized as an exemption. After careful consideration, we believe the only way through this dilemma is to have cable lifts classified in the code independently from trams. Currently, there is no classification for cable lifts in the SMP.</p>	

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15	9/19/2024	Kelly Roberts	kdroberts17@gmail.com	Code	Lighting Code	<p>Hello, Commissioners.</p> <p>I know it's coming down to the end days of the Comprehensive Plan, and for over 2 1/2 years I have been trying to get the lighting standards updated. I have been keeping tabs on the drafted revisions, and when I went to the Open House last week they were still as they have been for weeks, which is fine. However, to make the new language measurable, there needs to be an addition of numerical value by which to actually measure illumination. While the newer language is better, please consider having the DCD add a measurement of "no more than 2700K" to the revisions. Another part of the language uses the word "adjoining" when mentioning where light should NOT shine, but technically, in our communities, we are not flat and grid-like, and as such light will go where it can stray which is far beyond two properties that share a common boundary line. Please also consider having the DCD change the word "adjoining" to the word "surrounding" in the language.</p> <p>I appreciate your time and consideration, and thank you for all you do to serve our county.</p>	
16	9/23/2024	Anthony and Rebecca Augello	chipaugel77@gmail.com	General	Concern with growth	<p>Hopefully, you are listening to the residents who have been urging you to not allow yourselves to be influenced by a handful of developers, whose self interests do not have Kitsap County as a whole in mind with their development intentions. It is also clear that the overwhelming majority of residents do not support the ongoing urban sprawl that has already contributed to the deterioration of Kitsap, including the wildlife habitats, adequate buffer zones, and road infrastructure.</p> <p>In your final decision for the comprehensive plan, it is important to primarily take into account what has made Kitsap County unique in the first place, and the main reason why residents (and tourists alike) are drawn to the area. Once the wildlife and natural beauty of the area are removed, you cannot reverse it.</p> <p>The push for added development and growth have occurred mostly from poor government decision making and lack of true leadership rather than from actual demand for housing, and the residents are painfully aware of this. SEPA and the GMA were implemented to prevent irresponsible development, and Kitsap County leaders have allowed codes and regulations to be compromised and manipulated. This needs to come to an end, or Kitsap County will suffer the same negative consequences that other counties around Puget Sound (ie. King and Snohomish County) have suffered from subsidized development which will only eventually lead to poorly maintained neighborhoods and dangerous pockets of high crime. Hopefully, the leadership of Kitsap County has insight from mistakes that have been made over and over again by local governments when they allow such corruption to happen.</p> <p>Again, let's not forget what makes Kitsap County unique, that is its natural beauty and wildlife. What is better, tourism or subsidized projects that cannot be sustained long-term due to no true economic support for the development in the first place? As residents have pointed out in public meetings, the population forecast for Kitsap appears to be significantly exaggerated. This is supported by the fact that Kitsap County does not even have people applying for vacant job postings. The infrastructure has already been pushed to its limits.</p> <p>Eric Baker had stated that Kitsap County needs to have the additional apartments due to Governor Inslee's orders. This statement is not true, as exceptions definitely can be made when they have an adverse environmental impact on the area and even potentially violate current laws and regulations, including SEPA and GMA. Online, it's plain to see tourism is a major economic factor for Kitsap County, from sites such as Discover Kitsap, Visit Kitsap, and the Kitsap Economic Development Alliance. What has taken place over the past decade here has been appalling. The proposed mushrooming of more urban sprawl needs to come to an end. Enough is enough.</p>	

18	9/24/2024	Kevin Biggs	kevin@nxnwsurveying.com	Code	BLA	<p>I would like to request that todays changes to Title 16 section G be tabled for a seperate process to allow local surveyors to weigh in on the subject. As it stands, the proposed changes would likely prohibit many otherwise legal BLAs.</p> <p>The public should be allowed to benefit from the input of surveyors in our community that deal with BLAs on a regular basis. The county staff could benefit as well, the input from such a diverse group can help highlight pitfalls that otherwise are not so obvious.</p>	
19						<p>As a licensed professional Land Surveyor we are imploring you to strike the draft change to the definition of a boundary line adjustment from the comprehensive plan. This draft was thrown into the latest rendition without the opportunity for peer review or public comment. The draft is extremely poorly written and fraught with misuse and misinterpretation of terminology and principles of property boundaries which will only cause complete shutdown of any person's ability to change a property line for a large number of legitimate reasons. This language was clearly written by someone who has no knowledge of how to determine property boundaries, property ownership and no knowledge of the difference between fee title and easements or right of ways. The State of Washington only recognizes our court systems and land surveyors licensed by the state to make boundary determinations. The language in this definition fails to understand the basic 101 principles of property boundaries and clearly has not been written by either. I am imploring you to strike this from the changes to the compressive plan until this can be fully vetted by professionals who are licensed to make boundary determinations.</p> <p>Clearly the author of this definition is trying to prevent small strips of land, typically tax title, from creating larger building lots. Decades ago this was a common practice, however this was stopped long ago and was codified in Title 16.62, Legal Lot Determination. In fact most of the items listed in this change have already been codified under title 16.62 and there is no need to amend the current definition.</p> <p>The author further thinks it's possible to do the same with right of ways, vacated right of ways and easements. This is where the author shows they have zero understanding of the basic principles of land boundaries, ownershfee title and permissive use. The author fails to understand these items are not property boundaries, they are permissive use over another person's land. The land within these is still owned by the adjoining property owners. Changing an easement does not change a boundary. Changing a boundary does not change an easement. There is no possible way to take any of these items to create new lots. Yet, there are hundreds of real life scenarios where people want to BLA legally created land involving these. Here are some examples.</p> <p>Two neighbors agree to vacate an old county right of way between them but one land owner needs all of the right of way area. Kitsap County vacates the right of way and they both get the clear title of the land to the centerline. Afterwards they need to do a BLA to move the property line so one neighbor gets all of the right of way. This definition would prevent this.</p>	

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20	Tim Trohimovich (futurewise)	9/24/2024	Tim@futurewise.org	General		<p>We understand that the Planning Commission is holding a public hearing today on the 2024 Comprehensive Plan Update Preliminary Alternatives Development. Futurewise continues to support Alternative 2, the Planning Commission recommendation, without the proposed urban growth area expansions and with some additional features. This alternative is more likely to reduce greenhouse gas pollution, allow more affordable and middle-income housing, and to be affordable to taxpayers and ratepayers.</p> <p>The additional features include incorporate additional upzones within the existing urban growth areas to eliminate the need for UGA expansions and to provide for more affordable low- and mid-rise wood frame housing types. This will provide for more affordable housing and save taxpayers and ratepayers money.</p> <p>The comprehensive plan alternative needs to reduce rural growth rates over time to achieve the Regional Growth Strategy rural population growth target of eight percent of the county's total population growth. This will save taxpayers and ratepayers money, reduce adverse effects on the environment, and reduce the adverse impacts of natural hazards.</p> <p>The comprehensive plan alternative must reduce greenhouse gas pollution consistent with VISION 2050. This will reduce adverse impacts on water supplies, fish and wildlife habitat, flooding, and the environment.</p>	
21	Berni Kenworthy	9/24/2024	berni.kenworthy@axislandconsulting.com	Code	BLA	See Attached	LINK TO ATTACHMENT
22	Berni Kenworthy	9/24/2024	berni.kenworthy@axislandconsulting.com	Code	Various Code	See Attached	LINK TO ATTACHMENT

23	Gary Letzring	9/24/2024	Garyl@sittshill.com	Code	BLA	<p>In review of the proposed changes to Title 16 – regarding a Boundary Line Adjustment, I would encourage you to review the attached Boundary Line Adjustment Model Ordinance. This document was created by the Washington State DNR Survey Advisory Board, and they have been recommending this Model Ordinance for several years now to municipalities and communities that do not have an ordinance already (or need to modify an existing). This BLA Model Ordinance has been reviewed by numerous Planning departments, Auditor’s, Attorneys and Professional Land Surveyors and provides what the SAB feels as the minimum basic items needed for a Boundary Line Adjustment and compliance with state law.</p> <p>I would encourage your review of the attached BLA Model Ordinance prior to making any decision, as the document was created specifically for this purpose. Literally, hundreds and hundreds of hours have gone into the making of the document.</p> <p>Having recorded a few Boundary Line Adjustments in Kitsap County myself, a change is definitely needed. But the current proposed language seems haphazard and I don’t think this will do what is actually needed or desired for County Planning and the Public.</p> <p>If you have any questions, please do not hesitate to reach out to the DNR Public Land Survey Office, your county surveyor Ken Swindaman, the Washington State Survey Advisory Board or myself.</p>	LINK TO ATTACHMENT
24	David Myhill	9/24/2024	dmyhill@nolson.com	Code	BLA	<p>I have been made aware of the attached proposed changes to Title 16.04.050(G) and am offering the following as a comment on that draft:</p> <p>I have extensive experience with Boundary Line Adjustments in Kitsap, King, Snohomish, and Pierce Counties. I have both prepared them and followed along in their footsteps years after they have been recorded. I can state with authority that there is no crisis in the quality and nature of Boundary Line Adjustments in Kitsap County. With that statement in mind, I do recognize that there are occasional circumstances where it might benefit the county to have a mechanism for review and comment on a boundary line adjustment.</p> <p>I am concerned that the proposed response to a very rare scenario, as written, will adversely affect the people of this county with undue regulations, greatly increased costs, and less access to affordable housing. Please consider this email as my comment.</p> <p>I request that the council pause the implementation of this draft until the proposed change can benefit from a thorough comment period. I would offer my own time and services on an advisory committee if that would be helpful. I believe that we could greatly improve the quality of the proposed rule, and thereby benefit the people of the county.</p> <p>Please consider my comments and my request for an extension of the comment period.</p>	
25	Ed Coviello (Kitsap Transit)	9/24/2024	edwardc@kitsaptransit.com	General	Park and Ride Impact Fee	<p>I would like to comment about the \$2,542.76 per stall impact for park and ride lots. Kitsap Transit would like the County to consider reducing the amount or eliminating the fee. We fee this fee is not supportive of smart growth principles and may impact our ability to improve transit access in both urban and rural zones.</p>	

26	Linda Fischer	9/24/2024	LLpetunia14@wapecable.com	General	Concern with growth	<p>Kitsap County's Comprehensive Plan includes a 20-year blueprint for local policies, planning and capital facility investment. However, The Kitsap County Comprehensive plan does not consider the a cause and effect analysis and financial impacts on existing tax payers. But most importantly is does not support an environmental stewardship of our surrounding living systems of trees, plants, soils, ponds, lakes, birds and fish.</p> <p>KITSAP COUNTY IS WHERE OTHERS COME TO VACATION</p> <p>The comprehensive plan completely focuses solely on population and economic growth targets. There is no environmental advocacy efforts defined to protect our surrounding living systems. The Kitsap County Comprehensive plan does not address the three key elements of sustainability as it relates to existing landowners, economy and the environment. Economic sustainability is about making decisions that are in the long-term interest of the existing cities and towns. However, the plan does not establish sustainability goals and restrictions to maintain a more livable future protecting our environment within those cities and towns. This is critical if the 2024 Comprehensive Plan is for the next 20 years of population and economic growth.</p> <p>That said, I submit to the Planning Commission Public Hearing the following:</p> <p>The comprehensive plan mandates increases in population and economic growth that will have long lasting impacts. These targets most likely will be met with zoning changes. Here are some concerns I would like to submit:</p> <ol style="list-style-type: none"> 1. Changes to zoning means further impacts to an already poor ferry service 2. Changes to zoning means increased traffic & costs in roadway & bridge infrastructure 3. Changes to zoning means increased costs for new sewer/infrastructure & utilities. 4. Changes to zoning means increased need for water and depletion of the aquifer. 5. Changes to zoning means the overall costs of living will rise for those currently living here. And at the same time will increase HOUSING COSTS! 6. Finally to entice Developers & Builders to build low cost affordable housing in Kitsap County, what the county has previously done was to waive impact fees. This means the costs for road improvements have been borne by the current landowners in higher taxes. This needs to be addressed specifically within the plan for each proposed zoning change. 7. The comprehensive plan does not include CAUSE and EFFECT. - meaning there is NO direct relationship between an action or event or plan and its consequence or result or outcome. When the State Planning Commission is planning 20 years ahead, consequences are conveniently left to chance - as in the case of the aquifer on Bainbridge Island and other areas within Kitsap County. The availability of fresh water is vital to the basic needs of the people who live here in Kitsap County. The Comprehensive plan DOES NOT quantify the ground water recharge rate of the Kitsap aquifer. I would guess in recent years, the pumping of groundwater through wells combined with the drought, has caused underground aquifer to permanently lose essential storage capacity throughout the Kitsap peninsula. But I don't know that for sure, but I would think that would be a critical component within any comprehensive plan that is focused on population growth. 8. Finally, simply tell us where the water will be coming from and how much will be required in the 20 year plan. 	
28	Beverly Parson (submitted at Planning Commission Hearing)	9/24/2024		General		See Attached	LINK TO ATTACHMENT
29	Martha Burke (submitted at Planning Commission Hearing)	9/24/2024		General		See Attached	LINK TO ATTACHMENT
30	Gary Chapman (submitted at Planning Commission Hearing)	9/24/2024		Code	BLA	See Attached	LINK TO ATTACHMENT
Comments Received <i>after planning commission</i> (Between 9/24/24 and 10/29/24)							

31	Erica Marbet (Squaxin Tribe)	9/25/2024		Comp Plan	Environment, Rural Wells	In the time available, I have added comments to the draft comprehensive plan. If I left a suggested edit or proposed policy, I identified it as such. Regarding the rural permit-exempt wells, I request that you list out the current projection to 2038 for Kitsap County and the County's plan for offset projects somewhere in this document. There are many places where you could do that; I leave the choosing of the location to you. The Environment and Housing chapters come to mind. I clipped suggested language that comes right out of the comp plan EIS (below). The point is that the comp plan acknowledges everything around the need for development (number of people and housing units needed, capital facilities needed), but it does not acknowledge the water supply needed. Future water needs for existing water systems are covered by municipal water system plans and small water system plans with the Washington State Department of Health. Rural wells should be identified in the Kitsap Comprehensive Plan.	LINK TO ATTACHMENT
32	Beth Nichols	9/25/2024	dbnichols@centurytel.net	Code	Tree Code	<p>I shared this public comment at the Planning Commission meeting on Sept, 24 2024.</p> <p>It is important to recognize that human action should include caring for people and the planet. Maintaining the health of Earth, on which our existence depends, must take precedence, and we should treat nature as the foundation of life itself, not simply as an asset for humans to use. Give high priority to the protection and regeneration of our ecosystems for the well-being of current and future generations of all Kitsap inhabitants, including wildlife.</p> <p>Environmental conditions are changing more rapidly and unpredictably than in the past, and we need to give more explicit attention to climate change and its impact on the County's development. This includes reducing our county's contributions to climate change and prioritizing resiliency.</p> <p>One of the most powerful ways we can create more livable communities, lessen the impacts of climate change, benefit the environment, and contribute to the well-being of the human community is to keep and increase our tree canopy.</p> <p>The proposed tree canopy regulations in the Comprehensive Plan are unfortunately quite weak, but they are a small start. We would hope for stronger language about retaining trees, and that Kitsap County strengthens its protections for our remaining large trees and forests.</p> <p>Trees bring innumerable benefits to a community. One would hope that developers begin to recognize this and plan around them when building. The County can help by strongly incentivizing tree retention.</p> <p>Here are some valuable tree benefits: Removes carbon dioxide from the atmosphere. Shades homes and offices Reduces air pollutants such as sulfur dioxide, ozone and auto emissions. Reduces topsoil erosion and prevents pollutants contained in the soil from getting into our waterways. Trees help create a feeling of relaxation and well-being. Reduces noise pollution by buffering and absorbing as much as 50% of urban noise. Habitat for wildlife. As many as 100 different life forms can be found on one tree. Trees are beautiful. Neighborhoods with large trees draw people to them- people want to live there.</p> <p>Please keep and strengthen the proposed tree canopy regulations</p>	

33	Carol Price	9/26/2024	carol9price@comcast.net	General	Housing	<p>I made comment at the 9/24/24 meeting and this email is to follow up. I ran out of time to prepare for the meeting, I must apologize for being disorganized when I spoke.</p> <p>My first point about low to middle income residents was inspired by a statement made by one of the developers, who said that those at the bottom of the income brackets are not the ones that they (developers/builders) are building homes for, that their single family homes are for wealthier folks. The implication was that lower income residents could not afford such housing; I respectfully disagreed with him, saying that just because we may have lower incomes does not mean that we are without resources. (For instance, I own home and property, but live on a fixed, low income). I went on to say that renting an apartment or town home is too expensive, that we need alternative housing like cottages, condos, or co-housing in urban areas that we can actually buy. Elders, young families, single folks are profoundly limited in housing choices. To restate, as developers, builders and realtors cater to the wealthy minority, the rest of us, the majority, must double down in our search for housing. We are pressured into shared housing, or we are faced with moving out of the county, as three households in my family have done. My next point was to encourage the building of walk-able and bike-able communities in the Urban Growth Areas. We need to get out of our cars. We need to talk to each other. We need to be connected to services without the use of gasoline engines. Current state, county and urban roads simply do not support our communities.</p> <p>I tried to make the point that developers and builders need to be responsible and respectful of the land, resources, and residents here in the county. Their prime directive seems to be maximizing profits by building on every square inch of land in Kitsap.</p> <p>Finally I fully support the statements made by David Onstad regarding Best Available Science, Beth Nichols on reducing climate change with tree canopy, Doug Hayman on housing, Beverly Parson on a revised Mission and Vision statement for Kitsap County, and Martha Burke regarding parks and the PROS plan.</p> <p>And now for my final comment here, which was not directly addressed in the meeting by anyone. According to the WA Real Estate Market Report website for August 2024, the median priced home in Kitsap county went for \$525,000. According to the Zillow calculator, a household would need a yearly income of \$150,000 to buy this house. What percentage of county households can afford this? This is not a rhetorical question--I would appreciate an answer. Perhaps developers and realtors are relying on people from outside Kitsap--Bainbridge Island? Bellevue? California?--to buy the single family homes. And then there is the dwindling size of the average household, from Kitsap County's "Primary Drivers of Housing Supply, Puget Sound Region, 2020." Average households are expected to decrease from 2.5 today, to 2.36 by 2050. Does detached big box single- family housing even make sense for our Kitsap community?</p> <p>We need to sit down at the table and discuss how to serve the housing needs of ALL current Kitsap residents.</p>	
34	Jennifer Gerstel	10/1/2024	jengerstel@gmail.com	General	Transportation - Anderson Hill	<p>My name is Jennifer Gerstel and I own a home at 10738 Jetty Place inn the Westwind communitry off Anderson Hill. I am writing because I have several major concerns about the proposed high density housing proposed off Anderson Hill. Although I currently live with my husband Eric Samson in Korea, we hope to move back into our home in two years when he retires from his job here in Korea.</p> <p>I am visually impaired and cannot drive, so when I want to go to Silverdale to shop or go to a doctor's appointment, I have to walk down Anderson Hill Rd. Over the years I have on many occasions informed the County that this road is unsafe and that students cannot walk even the short distance from Twelve Oaks or Eastwind to CK Middle School or CK High School. The proposed development will only make this situation worse. In unincorporated Kitsap County, developers are not required to provide sidewalks that connect their development to other developments, so we end up with "sidewalks to nowhere" like the one at the bottom of Anderson Hill Road. Given the increased car traffic that this new development will cause, it seems reasonable that the developer should be required to build sidewalks along Anderson Hill Road,</p> <p>Also, in recent years, the loss of habitat has caused a dramatic increase in bear sightings in my neighborhood. It seems that any further development should require an environmental impact study to see how it will affect the local wildlife.</p>	

35	John Willett	10/4/2024	johnwillett@embargo.com	General	Forestry	<p>Comment 1: DCD Managers, Please review my ideas for the Comp Plan update concerning Forest Management in the Kitsap and investigate how you could include something like these recommendations into the update of the Kitsap County Comp Plan. I will be in the San Juan's next week and will not be able to attend this meeting on the 15th. I will be back on the 16th and available to work with you if you would like on my ideas and how to integrate them into the Update.</p> <p>Comment 2: I attended the SCAC meeting last night. I am hoping in the next year when you all look at the forest management angle of the update that you include some of the professionals around here in forest management. Like NNRG and Kirk Hanson and ex KCPD Forester Arno Bergstrom. You might also call in Art Schick, ex member of the KCPD Forest Board and retire Forester. I started the KCPD Forest Board with Arno. John Willett</p>	
36	Department of Commerce (Carol Holman)	10/8/2024	carol.holman@commerce.wa.gov	Comp Plan / Code	Housing, Transitional Housing, Parking Standards, ADU Standards	<p>Please find the housing team's preliminary comments related to the draft housing element attached for your consideration.</p> <p>As mentioned during our meeting, we have used Commerce checklists to conduct review of the draft housing element. Of course, feel free to reach out to us with any questions and we are happy to set up a date/time to discuss.</p>	LINK TO ATTACHMENT
37	Diane Fish	10/10/2024	d-fish@kitsapcd.org	Code	Tree Code	<p>I noted in your example from the briefing presentation for today's BOCC PM Meeting that you outline the challenges with tree replacement vs tree retention. I note that Callery Pears were planted - and not only are they a non-native species - they are an invasive species. As you highlight the challenges to tree replacement - please point that out.</p> <p>According to: 17.495.050.C.3.c. Individual species of non-native replacement trees planted shall not exceed 35 percent of the total number of all replacement trees unless approved by the Director due to site-specific conditions; and</p> <p>There is no mention in the proposed code about prohibiting invasive (or potentially invasive) species from being planted. Callery Pear and the more obnoxious Bradford Pear greedily invades natural habitats and out-competes native species for resources. They are not sterile and spread rapidly into other areas</p>	

38	Tricia Sears	10/10/2024	Tricia.Sears@dnr.wa.gov	Comp Plan	Mineral Resources, Geohazards	<p>In keeping with the interagency correspondence principles, I am providing you with comments on Kitsap County's Comprehensive Plan Amendment update (Commerce ID# 2024-S-7433).</p> <p>For this proposal submitted via Planview, I looked at the proposal and focused on areas related to WGS work. Of note, but not limited to, I look for language around the geologically hazardous areas, mineral resource lands, mining, climate change, and natural hazards mitigation plans.</p> <p>Specifically in this proposal, I reviewed the document Final Draft Kitsap County Comprehensive Plan 2024.</p> <p>Overall, the Comprehensive Plan is well written, nice work! I have a few additional comments.</p> <p>The Environment Goals, Policies, and Strategies provisions look strong.</p> <p>In a word search, critical areas are mentioned throughout the Comprehensive Plan 44 times (great), geologically hazardous areas mentioned four times, and mineral resources 29 times. Note that on page 75 of the PDF, there are three good land use strategies for mineral resources. Interestingly, under the references for mineral resources on this page, it does not mention the Kitsap County aggregate resources publication written by WGS. You can find the publication on Aggregate Resources WA - DNR by clicking on Kitsap County on the map under the header Aggregate Resource Maps.</p> <p>There are numerous maps included in the Comprehensive Plan; suggest including the critical areas map or at least referencing where it could be found.</p> <p>Recognizing the limitations of the current proposals, I want to mention that it would be great for you to consider these in future work, be it in your comprehensive plan, development code, and SMP updates, and in your work in general:</p> <ul style="list-style-type: none"> •Consider adding a reference to WAC 365-190-120 geologically hazardous areas for definitions in other areas besides the CAO. In addition, consider adding a reference to WAC 365-196-480 for natural resource lands. •Consider adding a reference to the WGS Geologic Information Portal in other areas besides the CAO. If you have not checked our interactive database, the WGS Geologic Information Portal, lately, you may wish to do so. Geologic Information Portal WA - DNR •If you have not checked out our Geologic Planning page, you may wish to do so. Geologic Planning WA - DNR <p>Thank you for considering our comments. If you have any questions or need additional information, please contact me. For your convenience, if there are no concerns or follow-up discussion, you may consider these comments to be final as of the 60-day comment deadline of 11/9/24.</p>	
39	Department of Commerce (Carol Holman)	10/14/2024	carol.holman@commerce.wa.gov	Comp Plan	Climate Change Element	See Attached	LINK TO ATTACHMENT
40	Bobbie Moore (Board of Village Green Metropolitan Park District)	10/16/2024	elliottmoore@mcast.net	Comp Plan	Kingston Subarea Plan	<p>All,</p> <p>Please find attached input from the Village Green MPD Commissioners, discussed and approved at last evening's regular meeting. We are asking that specified statements be removed from the document.</p> <p>We'd appreciate ultimately receiving confirmation that our input was received.</p>	LINK TO ATTACHMENT
41	Kevin Furtrell	10/17/2024	kevintylerfurtrell@yahoo.com	General	Mobile Home Parks	<p>There needs to be more opportunities for transitional housing like mobile home parks, campgrounds, and tiny home developments. The current zoning regulations make it nearly impossible to create the opportunity for private support in providing transitional housing. It may not be something that the County Commissioners, Planning Commission, or even CED would want to have in the community; however, it's evident that it is something people on hard times are willing to do. There's a pretty high number of lots larger than an acre with campers housing people. These single-family home sites with an accessory camper unit do not have adequate waste disposal, yet they have people (usually extended family members) living in them as an alternative to homelessness. Please consider relaxing the regulations so these transitional communities can be built.</p>	

42	Beth Berglund	10/21/2024	Bethisgreen@gmail.com	Comp Plan	Land Use, Environment, Economic Development	See Attached	LINK TO ATTACHMENT
43	Micah A. Stephenson	10/22/2024	micah.stephenson98@gmail.com	General		Hello and good morning due to the effects the cascadia fault line could have on roads built in this are from the cascadia fault line and seismic lines creating earthquakes, hurricanes, and even tornadoes due to shifting of geographical features, I was wondering if there were any updates I've attached code that permits being issued directly contradicts,	
44	Gitta Brown	10/22/2024	gitta.brown360@gmail.com	General	Impacts from growth	<p>We bought a home in Poulsbo in 2005, because we were longing to escape high density housing and traffic in CA. After traveling and researching WA and OR since the late 1980s as a future residence for retirement, finally Poulsbo and North Kitsap became the obvious choice for us. During that time we found that Poulsbo itself more than doubled in population, and so did its unincorporated area.</p> <p>Yet – infrastructure did NOT keep up with the growth of new residential and commercial structures. We now find ourselves stuck in traffic on all major roads and highways, and without Sheriffs to monitor ever increasing speed on highways 3 and 16, where 70-80mph has become acceptable!</p> <p>Having traveled through 37 of 50 States for decades, we realize that growth is everywhere – more or less managed or unmanaged. But despite being a culinary wasteland, North Kitsap is still our piece of paradise, because we're old and likely won't see the repercussion of another population/housing explosion. But we wanted to express our concerns about it nonetheless.</p> <p>Thank you for allowing us to do so...</p> <p>Gitta and Chuck Brown POULSBO</p>	
45	Jill Hamilton	10/22/2024	jckress@yahoo.com	General	Rural character, environment, transportation level of service	<p>I'm including the following comments from Kitsap Environmental Coalition, as they align with my views. I feel it's important to note that our county is a gateway to the Olympic Peninsula, a world-famous environmental jewel in the PNW region. As KEC states, preservation of nature here is imperative.</p> <p>1) Add Natural Character to the 2025 Year of the Rural focus: We are pleased that the County did not rezone in rural areas this year and plans to address both rural rezoning and farmland issues in 2025. Please expand the 2025 focus to include attention to nature as a whole to make significant strides in protecting our environment in both rural and urban areas.</p> <p>In 2024, progress was made in addressing changes to the Critical Areas Ordinance and introducing a Tree Canopy regulation. However, in their current form, these regulations do not adequately represent the importance of the tree canopy or adequately address protecting nature. The lack of completion of the PROS plan in 2024 with attention to protecting nature is also of concern. We suggest that the 2024 Comp Plan Update specifically state that in 2025, these documents are expected to be further reviewed to give greater attention to protecting nature.</p> <p>We must preserve and protect our most valuable assets—our forests, critical areas, and water supply—to develop climate resilience and a sustainable future for our residents. Rural Kitsap and open spaces are not just “vacant undeveloped lands.” They have definable qualitative and quantitative value to the residents of Kitsap County, and once gone, cannot be replaced. They are the habitat of many species, provide essential ecological functions that support the whole county and its residents, and contribute to the quality of life and defining character of Kitsap County.</p> <p>2) Require use of Best Available Science: For the past 15 months, KEC has warned the county leaders about DCD's disregard for Best Available Science. The WA Department of Fish and Wildlife (WDFW) has also presented their concerns and clearly states that DCD is disregarding Best Available Science and WDFW's recommendations. (ref: messages 520-526 on the Matrix of Comments on the FEIS)</p> <p>3) Prioritize the needs of existing residents and their future generations while attending to the protection of nature: The 2024 Comp Plan</p>	

						<p>Update and Preferred Alternative call for addressing both the expected population increase and the need for more diverse housing. More diverse housing is in contrast to the momentum of the past that has created a pipeline of single-family housing that is not affordable to the majority of current Kitsap residents. Priority should be given to the people who already live here by providing housing that is both attractive and affordable within urban areas before vesting more single-family high-end developments. Developers should not be granted extensions under old codes, allowed variances, or given a nearly automatic Determination of Non-Significance (DNS) that undermine our natural environment.</p> <p>4) Meet Level of Service Standards and resident needs: WSDOT has identified shortcomings in KC's transportation Level of Service (LOS) standards. If left unmitigated, these shortcomings will create serious traffic problems within the County. It is imperative to resolve these issues. Prioritize the development of dependable public transit and infrastructure for non-motorized transportation, including shared-use paths in urban areas and bike lanes, over projects designed to encourage tourism.</p> <p>5) Align resource allocation with Preferred Alternative, including protection of nature: Allocate county resources to prioritize the protection of nature and the Preferred Alternative 2. End previously approved projects of the past if they don't reflect those new priorities and current financial realities. Free up resources to deal with new priorities.</p> <p>We look forward to the County's implementation of its new vision, which calls for an engaged, connected, safe, healthy, livable, resilient, vibrant, and well-governed community.</p>	
46	Mark Goldberg	10/23/2024	mark@mbgco.biz	Land Use Reclassification	Mccormick UGA Expansion	<p>Attached are 3 aerial photos all looking north. The first photo has the traffic circle on Old Clifton Road and McCormick Village at the bottom of the photo and a small red triangle near the top of the photo which is the subject site, 10.55 acres. The next photo is about half way to the site from Old Clifton Road and it has the storm water retention pond kitty corner across the street. The third photo is a close up of the cleared site with the community park across the street and the transition of the road from 2 lanes to 4 lanes east of the north corner of the subject property.</p> <p>Please let me know if there's anything else I can provide you to support my case that this property should be included in the UGA for 2024 with a zoning of UMR(10-30DU/Ac).</p>	LINK TO ATTACHMENT
47	Betsy Cooper	10/23/2024	betsycooper1@gmail.com	Comp Plan	Land Use Element, Transportation Element	<p>Thank you for the opportunity to comment on the Final Draft of the 2024 Final Draft of the Kitsap Comprehensive Plan. Attached please find my comment for your consideration.</p> <p>The document is a testament to the great amount of thought, effort and time that has been put into its creation. All this work is greatly appreciated!</p>	LINK TO ATTACHMENT

48	Kath Wilham	10/23/2024	editor@aqueductpress.com	General	Rural character, environment, transportation level of service	<p>As a resident of Suquamish since 1998, I am very concerned that we have not done enough to protect the environment in our previous county planning. I urge you to adopt and enforce a Comprehensive Plan that will protect the environment; preserve a healthy balance of natural, rural, and urban areas; and improve Kitsap County through thoughtful progress that benefits all residents.</p> <p>As a member of the Kitsap Environmental Coalition, I am in full agreement with these points KEC has brought forward as needing to be considered in the plan:</p> <p>Add Natural Character to the 2025 Year of the Rural focus: We are pleased that the County did not rezone in rural areas this year and plans to address both rural rezoning and farmland issues in 2025. Please expand the 2025 focus to include attention to nature as a whole to make significant strides in protecting our environment in both rural and urban areas.</p> <p>Require use of Best Available Science: For the past 15 months, KEC has warned the county leaders about DCD's disregard for Best Available Science. The WA Department of Fish and Wildlife (WDFW) has also presented their concerns and clearly states that DCD is disregarding Best Available Science and WDFW's recommendations (ref: messages 520-526 on the Matrix of Comments on the FEIS).</p> <p>Prioritize the needs of existing residents and their future generations while attending to the protection of nature: The 2024 Comp Plan Update and Preferred Alternative call for addressing both the expected population increase and the need for more diverse housing. More diverse housing is in contrast to the momentum of the past that has created a pipeline of single-family housing that is not affordable to the majority of current Kitsap residents. Priority should be given to the people who already live here by providing housing that is both attractive and affordable within urban areas rather than allowing more single-family high-end developments. Developers should not be granted extensions under old codes, allowed variances, or given a nearly automatic Determination of Non-Significance (DNS).</p> <p>Meet Level of Service Standards and resident needs: WSDOT has identified shortcomings in KC's transportation Level of Service (LOS) standards. If left unmitigated, these shortcomings will create serious traffic problems within the County. It is imperative to resolve these issues. Prioritize the development of dependable public transit and infrastructure for non-motorized transportation, including shared-use paths in urban areas and bike lanes.</p> <p>Align resource allocation with Preferred Alternative, including protection of nature: Allocate county resources to prioritize the protection of nature and the Preferred Alternative 2. End previously approved projects of the past if they don't reflect those new priorities and current financial realities. Free up resources to deal with new priorities.</p> <p>I wish I could come to the meeting next week, but I will out at the coast (for the first time in 3 years).</p>	
49	Marilyn Caldwell	10/23/2024	caldwellam@msn.com	General	Silverdale Senior Center	<p>Praying that a permanent building is on that list for the immediate future. It has been over 20 years since the demolition of our building. All of our 91 members would greatly appreciate a permanent location to meet.</p> <p>Katie Walters has been in our corner for two years now. We sincerely hope that continues.</p>	
50	Amanda Dwyer	10/23/2024	amanda@westwardhound.com	General	Environment	<p>I am writing to voice my support of a comprehensive plan that prioritizes keeping green and wild spaces undeveloped. I absolutely support housing density, and welcome dense development, townhomes and apartments close to the ferries, transit centers and business districts. Seeing tracts of mature trees being razed to become space-wasting developments while acres of open space around the Olympic College and Shopping centers sits empty is demoralizing.</p> <p>As we address housing concerns and climate change, it's critical to allow as much green space to remain undeveloped to protect dwindling habitat and carbon sinks.</p> <p>Allowing a new gas station to be built on Bond Road???? That seems wildly misguided and tone deaf.</p> <p>I hope that your office will rise to the challenge to incentivize Rayioneer to keep the forest land as such. I understand that our region needs a healthy timber industry, it doesn't bother me to see logging, but allowing the forest to regenerate for future habitat and timber is one thing, selling it off for development is a travesty.</p>	

51	David C. Jones III	10/23/2024	dcjones@windermere.com	Transportation	Traffic - Anderson Hill	<p>Pages 30 and 31 address Anderson Hill Road (Bucklin Hill Road to Provost Road):</p> <p>Why are we stopping at Provost Road?</p> <p>The county has granted developers and builders permits to develop additional projects on Apex Road and along Dickey Road. These projects will only "dump" more traffic onto the Anderson Hill Road Corridor west of Provost Road. The implementation strategy doesn't consider this.</p> <p>Before any additional development permits are issued, a comprehensive Traffic Corridor Safety Survey (which was initially promised as far back as 2020 and again in 2022 but cancelled) should be completed (funded by developers/builders who want to develop new residential projects). Infrastructure identified by the survey must be added prior to the permits being issued. And...developers/builders must pay for the infrastructure improvements required. If development is completed without the infrastructure improvements in place, developers/builders will be gone and we (current residents) will have to deal with the aftermath.</p> <p>The Anderson Hill Road Corridor from the intersection of Bucklin Hill Road and the intersection of Olympic View Road is extremely dangerous. There is no traffic control and vehicle speed of 45-50 miles per hour is consistent. By the way, anyone who walks or rides a bike/skateboard along this roadway is risking their life. It's only a matter of time.</p> <p>Page 31 the Newberry Hill Road/Silverdale Way Roundabout:</p> <p>If this roundabout is being placed at the intersection of Newberry Hill Road and Dickey Road/Eldorado, this could be a problem. Vehicles turning right from Eldorado have a limited view of traffic travelling east on Newberry Hill toward Highway 3. The speed limit is reduced from 45 mph to 35 mph at the church but many drivers don't reduce speed. The problem is compounded by the grade/rise of Newberry Hill Road approaching this intersection. Vehicles on Newberry Hill Road will be hard-pressed to avoid a collision with vehicles attempting to turn right from Eldorado Blvd onto Newberry Hill.</p>	
52	Joseph Piecuch	10/24/2024	joepiecuch@gmail.com	General	Environment	Please adopt a comprehensive plan that prioritises environmental and wildlife protection and preserves what is left of native landscape, such as it is. Keep Kitsap green.	
53	Liz Felton	10/24/2024	mahalo2650@gmail.com	Transportation	Traffic - Anderson Hill	<p>I firmly believe that more building of homes will occur and are needed. However, the traffic impact must be addressed and dealt with before this occurs , not after.</p> <p>The amount of traffic specifically on Anderson Hill Road has grown into a disaster already. The speeding, unsafe walking conditions for our students going to school, and waiting for school buses is an accident waiting to happen.</p> <p>Even driving has become a high risk. Trying to turn onto Anderson Hill Road from Sirocco Circle is very dangerous during peak times. I feel like a mouse trying to cross a herd of cattle most mornings just getting to work.</p> <p>Please, consider the safety of the families that deal with these real life situations daily.</p> <p>Don't let our reality make it necessary to seek moving out of this area because of a serious safety problem.</p> <p>We deserve the support of smart planning in our future that makes safety a priority.</p>	
54	Kevin Shearer	10/24/2024	shearerexcavation@hotmail.com	Land Use Reclassification	Shearer Industrial Reclassification	<p>Dear Kitsap County Commission,</p> <p>Please see Attached packet for our request to Rezone our property to industrial use in South Kitsap County under the updated Comprehensive Plan.</p>	LINK TO ATTACHMENT
55	Renee Ziemann	10/24/2024	renee.ziemann@gmail.com	General	Agriculture, housing	Thanks for your hard work on the County Comprehensive Plan. I just wanted to encourage you to focus on preserving green space (as a farmer in Kitsap, I value agricultural spaces, obviously, but find that preserving forested lands benefits my farm by offering spaces for wild creatures to live without coming frequently onto farmlands and benefits me by offering me a space to take a recreate with my young kids). I also value affordable housing for all who are struggling to find housing in Kitsap, including my employees, and transit options for my husband and others who commute and are often stuck in traffic or biking without a safe bike lane.	
56	Mary Gleysteen	10/24/2024	marygleysteen@gmail.com	General	Environment	As you act to adopt the new comprehensive plan please keep the environment foremost in your thoughts. We need to preserve natural and rural areas while improving urban spaces. Once destroyed and built over, these green areas are gone to us forever.	

57	Beverly Parsons (on behalf of KEC)	10/25/2024	bevandpar@aol.com	General	Rural character, environment, transportation level of service	Attached are comments on the Comp Plan Update and related regulations from the Kitsap Environmental Coalition (KEC) Board. Thank you for consideration of our requests. Beverly Parsons on behalf of the KEC Board.	LINK TO ATTACHMENT
58	WSDOT (Ashley Carle)	10/25/2024	ashley.carle@wsdot.wa.gov	Transportation	Transportation Level of Service	Please find the attached WSDOT comment letter on the Kitsap County Final Draft Comprehensive Plan and associated Final Environmental Impact Statement.	LINK TO ATTACHMENT
59	Alecia Nye (Olympic College)	10/25/2024	anye@olympic.edu	Comp Plan	Land Use Element, Econ Dev Element	<p>Olympic College is dedicated to enhancing local and regional medical care by educating future healthcare professionals, while eliminating barriers at the same time. This includes supporting efforts to improve the Health Professional Shortage Area (HPSA) designation, expand healthcare education and offer low-cost healthcare services. OC believes that the additional and reworded text provided below will help OC with their mission. Thank you in advance for your consideration, and as always, I am available for further information.</p> <p>Public Comments on behalf of Olympic College: PAGE 37 Olympic College (OC) would like to change the wording on Land Use Policy 6.6: Encourage land use that removes barriers to expansion of medical and health care opportunities, student housing, access to services for seniors, students, and underserved communities.</p> <p>OC would like to add a new Land Use Strategy 6.c: Support grant funding to help subsidize student housing for health care education.</p> <p>PAGE 88 It is our understanding that Kitsap County has been designated as a Health Professional Shortage Area (HPSA). We believe including this in the Comp Plan will help OC and the County seek Federal and State HPSA funding. OC would like the Comp Plan to acknowledge this designation in the Economic Development Goal 9 Health care section: Acknowledge that Kitsap County has been designated as a Health Professional Shortage Area (HPSA); accommodate growth in health care access, services, employment, and higher education opportunities.</p> <p>Economic Development Policy 9.3. 1.OC would like to change the wording to read: Expand options for health care access to support a local pipeline of healthcare professionals and provide more local educational opportunities for future Kitsap County professionals to build an employment base for existing and future populations.</p> <p>2.OC would like to add 2 new strategies:</p> <p>1.Economic Development Strategy 9.c. Invest in and support student housing and childcare infrastructure to grow the Olympic College Allied Health Campus. 2.Economic Development Strategy 9.d. Work with Olympic College to help research state and federal grant opportunities to fund a new Olympic College Allied Health building on its campus which would include a low-cost primary care clinic, low-cost dental clinic, and mental health services.</p>	
60	Beverly Parsons (on behalf of KEC)	10/27/2024	bevandpar@aol.com	Comp Plan	Parks Element, Environment Element	<p>I'm Beverly Parsons from Hansville. I would like you to consider the following as you refine the Comprehensive Plan Update in preparation for approval in December 2024.</p> <p>1. I support the comments submitted by the Kitsap Environmental Coalition (KEC) Board on October 24, 2024. They make requests related to five topics:</p> <ul style="list-style-type: none"> a. Add Natural Character to the 2025 Year of the Rural focus. b. Require use of Best Available Science. c. Prioritize the needs of existing residents and their future generations while attending to the protection of nature. d. Meet transportation Level of Service standards and resident needs. e. Align resource allocations with Preferred Alternative, including protection of nature. <p>The comments submitted by the KEC Board provide details on each of these topics. Please give them careful consideration.</p> <p>2. I support the detailed comments submitted by Beth Berglund about the Comp Plan on October 21, 2024. Again, please give these comments careful consideration.</p> <p>3. I am concerned about Parks Strategy 1.e. in Chapter 6 (Parks, Recreation, and Open Space Element). It reads: Enhance the Port Gamble Forest Heritage Park Framework with additional environmental and wildlife habitat assessments before planning new major projects within the Park. While I applaud the strategy to conduct environmental and wildlife habitat assessments, I find the wording of this strategy to be problematic because the PGFHP framework has never been approved. There has been considerable public comment in opposition to the</p>	LINK TO ATTACHMENT

						<p>framework as it now exists. A new process for developing this framework is needed. A second concern about Strategy 1.e. is the lack of clarity about what is meant by “new major projects”. The Parks Department has several major projects underway that do not appear to have had adequate programmatic review before moving to project review. Those projects seem to be proceeding under old approvals that have not been reviewed under the new Comp Plan Update. It is not clear that the Commissioners have adequately reviewed those projects under the new Preferred Alternative and current budget constraints. The wording of this strategy does not adequately define what is meant by “new”.</p> <p>All in all, I suggest this strategy be reworded. A suggestion is: Conduct environmental and wildlife habitat assessments to determine appropriate land classifications to be used to design a new Port Gamble Forest Heritage Park Framework. Redesign the current draft Port Gamble Forest Heritage Park framework (which has not been approved) with broad involvement of interested parties.</p> <p>4. While I appreciate the community engagement processes that the Commissioners and county staff have used, we are all aware that the processes have not resolved the challenges we face as we address complex housing needs along with increasing environmental changes, many of which are associated with climate change.</p> <p>I want to call your attention to a community engagement process that may be useful to consider. It is provided by the nonprofit organization, Community Heart and Soul. As the organization states: It is a resident-driven process that engages the entire population of a town in identifying what they love most about their community, what future they want for it, and how to achieve it. This process has been developed and field-tested over a decade in partnership with over 120 small cities and towns across America.</p> <p>Attached is a copy of their overview and introductory book. I am familiar with, and have used, several methods of community engagement over the years. I think this one may be especially appropriate as you move from approval of the Comp Plan in December to its implementation. That implementation would include the work plan you are developing for 2025 about the Year of the Rural and other decisions.</p> <p>Kitsap County is defined by abundant nature and a mix of rural areas, small towns, and urban areas. We must take action to preserve that balance, or we can slide toward becoming just another suburb of the Seattle metropolitan area. The Comprehensive Plan Update is our opportunity to preserve what makes Kitsap County special at this tipping point moment in time. What we lose now can never be brought back.</p> <p>Thank you for the important work being done on the Comp Plan Update.</p>	
61	Kelly Roberts	10/27/2024	kdroberts17@gmail.com	Code	Lighting Code	<p>After looking at your very FULL agenda for tomorrow evening’s meeting, and not knowing when I will actually get home from the meeting, I will not be able to attend in person as I planned. With parent/teacher conferences this week, I am not a glutton for punishment, so I will simply share my input here. Please let me know if I need to send my message to anybody else for the record, as well.</p> <p>Thank you so much!</p> <p>My input as follows: Upon review of the currently-drafted revisions (as of 10/27) of the lighting standards for existing AND new developments, my input is as follows:</p> <p>Re: 17.105.110 - current language in drafted revisions 17.105.110 Obnoxious things. In all zones, except as provided for elsewhere in this title, no use shall produce noise, smoke, dirt, dust, odor, vibration, heat, glare, toxic gas or radiation which is materially deleterious to surrounding people, properties or uses. Lighting is to be directed downward and away from adjoining properties in accordance with KCC 17.420.030.C. Not more than one foot candle of illumination may leave the property boundaries.</p> <p>a. Comments: More than “downward and away,” lighting should also be SHIELDED, as stray light finds its way outward and upward, no matter the downward placement of the luminaire...</p> <p>In the sense of materially deleterious, it is harmful to people’s optical systems due to its electro-magnetic radiation and disrupts their circadian rhythms.</p> <p>☒</p> <p>It is environmentally unfriendly since it is artificial and interferes with the natural cycles of wildlife animals, particularly nocturnal animals, also.</p> <p>☒</p> <p>A disturbance of peace, whereas according to RCW 7.48.010, “...or whatever is injurious to health or indecent or offensive to the senses, or</p>	

						an obstruction to the tree use or property, so as to essentially interrere with the comfرتortable enjoyment of the lire and property,...”	
62	Mari Cleven	10/27/2024	maricleven@gmail.com	General	Environmental Protection	<p>The Comprehensive Plan will shape our county’s future for the next twenty years. As a resident of Kitsap County, I ask you to adopt and enforce a Comprehensive Plan that will protect the environment; preserve a healthy balance of natural, rural, and urban areas, and advance Kitsap County through thoughtful progress that benefits all who live here.</p> <p>Maintaining a balance of natural, rural, and urban areas protects our quality of life, gives us choices in how and where we want to live, supports smart economic growth, and provides Kitsap County residents with jobs and commerce, as well as educational, recreational, and cultural activities. Advance Kitsap County through thoughtful progress that benefits all who live here – including wildlife. I do not oppose development, but I believe it should be measured by its total impact on the community and environment, and that true progress benefits everyone.</p> <p>Thank you for your consideration and please help keep Kitsap green.</p>	
63	Jackie Kelly	10/27/2024	jkelly@wavecable.com	General	Concern with growth	<p>Thank you for all your diligence in completing the many tasks you have set to conclude this year 2024 including the Comprehensive Plan that will set in motion the direction of growth in Kitsap County for the next 20 years. It is an awesome responsibility and though you have help in guiding your determination the ultimate responsibility falls on your shoulders. Reviewing Kitsap County’s mission statement along with the stated Visions and Values I find a broad view of wonderful goals for our County. I support these aspirations. There is no problem with what you envision but there is a problem in how it is carried out.</p> <p>Our County, like much of the developed world, has gone along for centuries without any thought to how we humans shape our environment. Recently through science we realize, much to our lack of foresight, that what we do with our environment has a major impact on our planet/County. We are in climate trouble of our own making. Here in Kitsap, I doubt we are all that different from other counties encouraging growth with little thought to consequences. Our Department of Community Development has had a fairly free reign to align with developers following existing codes which are often vaguely written, without a science base, using loopholes around codes almost at their whim. This kind of careless and thoughtless unscientific carte blanche approach to appease developers is not the way to pursue a balanced environment that leaves our planet/county in a healthy equilibrium with nature. Through my short time working on the permit process, I found it an admirable idea to streamline the process. But one of the ways they seem to be planning to streamline is to leave out the public or render the public desires negligible. I just can’t feel good about that. After all, the government is here to serve the People and the public is all the people who live here.</p> <p>I am asking as you finalize the Comprehensive Plan and rewrite County codes to bring them into the clear focus that upholds our Mission Statement, Vision, and Values to please raise your standards high based on Best Science as we know it, thinking in the Big Picture of how actions can improve our world and not lead it to disintegration.</p>	
64	Susan McDonough-Wachtman	10/27/2024	suewriteusa@gmail.com	`	Environmental Protection	<p>The Comprehensive Plan will shape our county’s future for the next twenty years. As a resident of Kitsap County, I ask you to adopt and enforce a Comprehensive Plan that will protect the environment; preserve a healthy balance of natural, rural, and urban areas, and advance Kitsap County through thoughtful progress that benefits all who live here.</p> <p>The world is in a perilous place, but maybe we can at least keep Kitsap healthy for awhile.</p>	
65	Brian Stevens	10/27/2024	bds2@comcast.net	Code	Living in RVs, RV Code	<p>The comprehensive plan must address violations of the code that disallows permanent residence in RV's. Many lots in residential Kitsap have RV's that are being lived in while violating county code and lacking proper sewage treatment, sanitation, and utilities. Though the county offers transitory housing permits, this process is ignored by many of the landowners and residents, and even if complaints are received by DCD, the letters of non-compliance that they send are also ignored with none of the stated consequences being enforced. Many of these RV residences are in fact not 'transitory' as they are being lived in for years.</p> <p>Permanent RV residence has become a 'lifestyle choice' and the DCD is ineffective in their attempts to enforce code preventing permanent RV occupancy on residential lots. The county should establish several concentrated areas separate from our residential neighborhoods where RV's can be parked and legally lived in with proper sewage and utility connections thereby allowing this housing alternative to be monitored and regulated, while preserving our residential neighborhoods by moving the currently occupied RV's to the designated areas.</p>	

66	April Ryan	10/27/2024	aprilryan@mac.com	General	Enviornment, Transportation Level of Service	See Attached	LINK TO ATTACHMENT
67	Laura Rotegard	10/28/2024	lmrotegard@gmail.com	General	Support for compact growth	<p>Please endorse the 'compact building' growth direction so that valuable FORESTS and productive agricultural uses are preserved. Encourage small business farming and leave forests intact. No county forest harvest on the new EGLON holding. And Arborwood is a travesty in the process of righting itself.</p> <p>Intact, forests clean the air and waters for our salmon streams, so critical to the recovery of the endangered Southern Resident Orcas.</p> <p>Intact forests make Kitsap County a healthy place to live. Small business farming makes us economically fit, and healthy as well. We need zones in the comp plan that identify these attributes and leave them alone. Not envisioned for development.</p> <p>As a community planner and Landscape Architect, I have given presentations on the fastest way to a county's bankruptcy.....fell the trees and develop the farmlands. The best way to remain solvent, thriving? Protect the natural resources and systems(stream clarity-salmon vigor-orca health-human health) that we all benefit from... and resist large lot residential development-spread. This is the essence of SMART GROWTH which has been adopted and practiced in healthy counties across this nation for over 30 years.</p> <p>PLEASE support an ordinance to identify and protect large trees. Recently a neighbor cut down a healthy, 156 year old Western Red Cedar. Many of us counted the rings of the logs. He had every right, but still it was morally appalling. There must be incentives to encourage that neighbor to keep such a magnificent tree. It starts with an identification program, and a rewards system for protecting the county's best. Tax deduction? As we pondered that tree, we discussed the history it had witnessed while grieving its loss. More importantly, science is plentiful and unified in the carbon fixing and oxygenating exponential goodwill of these century old giants. They help us breathe!!!</p> <p>Please follow the values of sound planning and hold our natural resources for future generations. We can always find better ways to create county income and lessen expenses without sacrificing what makes us whole.</p>	
68	Meeshka Bernabe Brand	10/28/2024	earthfriendly@northwestcl.com	General	Environmental Protection	<p>The Comprehensive Plan will shape our county's future for the next twenty years.</p> <p>As a resident of Kitsap County, I ask you to adopt and enforce a Comprehensive Plan that will protect our environment, including our wildlife; preserve our natural areas, trees, and shorelines; and make holistic decisions for Kitsap County's future that de-prioritize economic growth above all else.</p> <p>Keep Kitsap Green!!</p>	
69	Colby Brand	10/28/2024	colby.brand@gmail.com	General	Environmental Protection	<p>The Comprehensive Plan will shape our county's future for the next twenty years. As a resident of Kitsap County, I ask you to adopt and enforce a Comprehensive Plan that will protect the environment; preserve a healthy balance of natural, rural, and urban areas, and advance Kitsap County through thoughtful progress that benefits all who live here.</p> <p>Keep Kitsap Green!</p>	
70	Josh O'Brien	10/28/2024	obrien.josh@gmail.com	General	Environmental Protection / Radiant Rezone	<p>The Comprehensive Plan will shape our county's future for the next twenty years. As a resident of Kitsap County, I ask you to adopt and enforce a Comprehensive Plan that will protect the environment; preserve a healthy balance of natural, rural, and urban areas, and advance Kitsap County through thoughtful progress that benefits all who live here.</p> <p>I ask that you vote against the Bond/Raydient Rezone.</p>	
71	City of Bremerton (Garrett Jackson)	10/28/2024	Garrett.Jackson@ci.bremerton.wa.us	Land Use Reclassification	Bremerton UGA Expansion	See Attached	LINK TO ATTACHMENT
72	Futurewise	10/28/2024	Tim@futurewise.org	General	Environment, Housing, etc	See Attached	LINK TO ATTACHMENT

73	Karen Nordstrom	10/28/2024	karenfnordstrom@comcast.net	Code	Living in RVs, RV Code	A number of Kitsap County residents are living permanently, full-time in Recreational Vehicles/travel trailers on private property in neighborhoods zoned as residential, on lots without a septic or sanitation connection. Although Kitsap has a transitory housing permit program, there are many cases where property owners don't bother with permits, and there seem to be few consequences to them for ignoring warning letters or orders to vacate. This enables these code violations to continue for years and spread as others learn there is little or no enforcement. There are consequences to some Kitsap residents who purchased a home in a residential neighborhood but end up living next to unauthorized campgrounds/RV parks with very little or no county oversight, decreasing the value of their own property and quality of life. Perhaps the county could set up centralized RV parks in unused, non-residential areas for those who are unable to transition into stable permanent housing, where they could live in their RV's (or donated RV's) and have access to sanitation facilities and social services if needed. The parks could have community P-patches where residents could grow vegetables if desired, and maybe permanent housing solutions could be worked towards with help from the HEART team or other resources. In the meantime, please ensure the county upholds our residential zoning regulations and code. I will be enthusiastic about a comprehensive plan when our current code is efficiently supported and enforced by our county government.	
74	Eric Hall	10/28/2024	halleric@cityu.edu	Transportation	Transportation (McWililams Rd)	See Attached	LINK TO ATTACHMENT
75	Marion Allen	10/28/2024	maidmarion957@gmail.com	Code	Tree Code	<p>These are the trees, 25,30 to 40 years and older that are storing carbon for us to safely live on the planet Earth. The older they are the more carbon they store, and it is also stored in the ground under the forest.</p> <p>Mature trees do even more than store carbon:</p> <p>They are coolers.</p> <p>They clean the water we pollute.</p> <p>They are homes for the wildlife we love.</p> <p>Why are we letting the developers and the timber company, Rayonier tell us how to take care of our county? The cost of clearcutting timber will be obvious to the future generations. They will know we put their safety over our pocketbooks.</p>	
76	Cindy Allpress	10/28/2024	cindyallpress@gmail.com	General	Royal Valley Develo	<p>It is a bit past 5:30 but I had a bit of an emergency today so I hope this will be accepted.</p> <p>I understand the need for housing in Kitsap. However, I am concerned that DCD has approved far too many new housing developments especially in the CK area. Living next to the Royal Valley project we have observed how DCD has chosen to basically ignore their own codes for allowing for a sight obscuring screen between our RURAL properties. This central valley community has spent hours trying to appeal the clear cutting of the old growth on that property, to no avail as this was given the green light years ago with no concern for the adjoining farms.</p> <p>WSDOT also seems to be completely out of touch with how this development will effect Waaga Way (303) and the Central Valley Road. The TIA that was done for the Royal Valley development was done almost 4 years ago. How is that data even relevant to today? WSDOT claims this (outdated) analysis to be " appropriate and reasonable". I disagree.. We are currently trying to get a community meeting with WSDOT to address this because their solution to the increase in traffic is to 'RESTRIPE' waaga way. This is ludicrous and will be dangerous as that westbound traffic is doing upwards of 60/mph. At a minimum, there needs to be a light there due to the fact there is a large church and a new housing development directly across the road.</p> <p>With all these new housing developments popping up, it appears that infrastructure to handle all the population increase, is only an after-thought at best. The traffic as you know, is already a mess to the point of being unsafe, especially at the 303/Old Military intersection. The Sheriffs office is already lacking in deputies and apparently will not be funded to hire more personnel. St. Michael's (ER) is totally inefficient now and cannot handle the existing population.</p> <p>Do these things not concern you ?</p> <p>[comment #2] Thank you for extending the comment period.</p> <p>Ive already submitted a comment, but one thing that I failed to mention...</p> <p>I really hope that DCD would start to respect private property owners. I have heard so many horror stories of people just trying to improve their property, and DCD takes it upon themselves to scrutinize every little thing they want to do. And then CHARGE A FEE TO APPROVE IT !!</p>	

77	Carol Price	10/28/2028	carol9price@comcast.net	General	Environment, Transportation	<p>I am a member of Kitsap Environmental Coalition and am in full support of the points below.</p> <p>When I reflect on the human predicament on planet Earth, it appears that the only conclusion left for us is to search our souls and change. I continue to be concerned about Kitsap Parks, the lack of affordable housing, and keeping Kitsap County green.</p> <p>Thank you all for your diligence and attention,</p> <p>Best regards,</p> <p>Carol Price</p> <p>Kitsap Environmental Coalitions bullet points, shortened:</p> <p>1) Add Natural Character to the 2025 Year of the Rural focus: We are pleased that the County did not rezone in rural areas this year and plans to address both rural rezoning and farmland issues in 2025. Please expand the 2025 focus to include attention to nature as a whole to make significant strides in protecting our environment in both rural and urban areas.</p> <p>We must preserve and protect our most valuable assets—our forests, critical areas, and water supply—to develop climate resilience and a sustainable future for our residents. Rural Kitsap and open spaces are not just “vacant undeveloped lands.” They have definable qualitative and quantitative value to the residents of Kitsap County, and once gone, cannot be replaced.</p> <p>2) Require use of Best Available Science: For the past 15 months, KEC has warned the county leaders about DCD’s disregard for Best Available Science. The WA Department of Fish and Wildlife (WDFW) has also presented their concerns and clearly states that DCD is disregarding Best Available Science and WDFW’s recommendations. (ref: messages 520-526 on the Matrix of Comments on the FEIS)</p> <p>3) Prioritize the needs of existing residents and their future generations while attending to the protection of nature: The 2024 Comp Plan Update and Preferred Alternative call for addressing both the expected population increase and the need for more diverse housing. More diverse housing is in contrast to the momentum of the past that has created a pipeline of single-family housing that is not affordable to the majority of current Kitsap residents. Priority should be given to the people who already live here by providing housing that is both attractive and affordable within urban areas before vesting more single-family high-end developments. Developers should not be granted extensions under old codes, allowed variances, or given a nearly automatic Determination of Non-Significance (DNS) that undermine our natural environment.</p> <p>4) Meet Level of Service Standards and resident needs: WSDOT has identified shortcomings in KC’s transportation Level of Service (LOS) standards. If left unmitigated, these shortcomings will create serious traffic problems within the County. It is imperative to resolve these issues. Prioritize the development of dependable public transit and infrastructure for non-motorized transportation, including shared-use paths in urban areas and bike lanes, over projects designed to encourage tourism.</p> <p>5) Align resource allocation with Preferred Alternative, including protection of nature: Allocate county resources to prioritize the protection of nature and the Preferred Alternative 2. End previously approved projects of the past if they don’t reflect those new priorities and current financial realities. Free up resources to deal with new priorities.</p> <p>We look forward to the County’s implementation of its new vision, which calls for an engaged, connected, safe, healthy, livable, resilient, vibrant, and well-governed community.</p>	
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78	Beth Nichols	10/29/2024	dbnichols@centurytel.net	General	Housing, Compact Growth	<p>I would like to speak to housing issues in the Comprehensive Plan.</p> <p>Kitsap County has a mandate to build more diverse housing units to meet the needs of the people who live here and those who will come in the next 20 years. A missing piece in the Comprehensive Plan is how to actually make this happen- to strongly and effectively incentivize missing middle housing, as well as measure permitted housing to make sure we meet that mandate. In the past Kitsap has allowed a pipeline of single-family homes that are above the means of the median income. We are needing to correct that imbalance now. But we need concrete processes to move from aspiration to reality.</p> <p>At the level of permitting, the County and DCD needs to be accountable to ensuring they are building the right kind of housing. A “five year look back” is too late -- too many opportunities will be lost - land will be poorly used, we will have more suburban sprawl, and more residents will be priced out of housing. DCD needs to have specific and measurable ways to ensure that permitting is focused on strongly encouraging affordable units- not the usual developments of high-end single-family homes and developments that encourage suburban sprawl into the rural areas. Unfortunately, many developers will still push to build higher end homes because they are the most profit generating, although they don’t meet the greatest need in the community. We already have a surplus of large high-end single-family homes that are unaffordable to people with median incomes.</p> <p>Another measurable step to take is to create a rental registry that collects data on available rentals in the County, and who owns those units. Large corporations – many out of state- are seeing housing as an opportunity for lucrative investment, which has the effect of harming our communities and creating a crisis of affordable rentals and home prices. Housing is a basic need and not a commodity. This is one piece of the housing crisis that needs immediate attention, and a registry of ownership of housing is a first step, so we know who owns our housing stock.</p> <p>We also need to ensure that building is focused in the urban growth areas and not in rural areas that we need to protect, a goal stated in the Comprehensive Plan. But we need to make this goal real. The need for housing needs to be thoughtfully balanced with protection of our natural resources.</p> <p>The County needs to follow through with the protection of rural areas and keep development in urban areas to make this Comprehensive Plan effective and meaningful. In 2025 when rural rezones are to be considered, the County should recommit to ensure that rezone decisions are made in keeping with centering growth in urban areas and following the Comprehensive plan.</p> <p>Kitsap County will grow, and I acknowledge the need to accommodate growth thoughtfully. But I am asking you to ensure that growth is managed in a way that protects nature, preserves our balance of natural, rural, and urban areas- and puts the needs of our current residents first.</p> <p>Thank you for all of your efforts, your dedication, and thoughtful consideration of the future of Kitsap County.</p>	
79	Christie Schultz	10/29/2024	christiesue5150@yahoo.com	Land Use Reclassification	Enetai	<p>Dear Madams: I apologize, I spoke spontaneously at your meeting last night on the GMA and may not have been completely clear. In regards to the Enetai Fisher-Cheney plat and erroneous zoning. The Fisher Plat sit atop what could be characterized as a fracture zone associated with the Seattle Faultline, which is frightenly sizable when you look at it on USGS maps. We have in the past month had several tremors on this fault-line, so it is indeed active. IMHO as a science teacher (certified by the State of Washington) an area on top of a fault zone has no business being zoned "9 units to an acre".... it's asking for trouble in the future WHEN the larger quakes happen.</p> <p>Even if the present owner never gets around to developing the acreage, future owners COULD, and the zoning should reflect the geological features of the area; the UGA is incomplete without considering geological zones (including aquifer recharge zones) as well as wild life corridors. A good start has been made with tree canopies, and buffer zones for wetlands and salmon streams. Let's think a little deeper and include geologically hazardous regions. Start by rezoning the Fisher Plat to something lower and more rural.</p>	



Skokomish Indian Tribe

Tribal Center (360) 426-4232

N. 80 Tribal Center Road

FAX (360) 877-5943

Skokomish Nation, WA 98584

August 5, 2024

Kitsap County Commissioners

614 Division St. MS-4

Port Orchard, WA 98366

Emailed request to: kitsapcommissioners@kitsap.gov; compplan@kitsap.gov

Re: Kitsap County Comprehensive Plan Update –Revised Request for Property Reclassification & Urban Growth Area Designation for Skokomish Indian Tribe Properties

Dear Kitsap County Commissioners,

The Skokomish Tribe is submitting a revised rezone request for parcels **152301-4-014-1009** and **152301-4-013-1000**, from their current designation as “Rural Reserve” to “Industrial.” This request is consistent with surrounding and adjacent parcels, as well as the Kitsap County staff recommendation to reclassify Rural Reserve properties to the north of the Skokomish parcels. The Skokomish parcels front onto SR 3, adjacent to planned growth within the Puget Sound Industrial Center, the City of Bremerton Urban Growth Area (UGA), and the Port of Bremerton. As part of the rezone, and consistent with staff recommendations for the parcels immediately north of the Skokomish parcels, the Tribe is requesting inclusion within the City of Bremerton UGA.



1. Land use compatibility

- Subject parcels are located at the node where the existing SR 3 mainline will divert to become the SR 3 Freight Corridor, with a WDSOT-approved roundabout intersection serving both to provide access to the parcels but also as a key element of future regional travel.
- Adjacent parcels, also north of SR 3 and currently zoned Rural Reserve, are proposed for Industrial zoning with the Comprehensive Plan Update, as recommended by staff and Planning Commission. Although this adjacent area is zoned Rural Reserve, it is actively being used for industrial type purposes (see inset photo). Rezoning of the subject properties and inclusion with the Urban Growth Area would be compatible with the future adjacent industrial zone and would create a more cohesive boundary for the amended UGA.
- The subject parcels are contiguous to the UGA and the PSIC in the current Comp Plan.

2. Planned infrastructure investment and expansion

- This request is consistent with the Kitsap County capital facilities planning being done in conjunction with the Comprehensive Plan update.
- The City of Bremerton, Mason County, and WSDOT are all actively planning for development in this area, with intent to build additional infrastructure to support increased demand resulting from the development of PSIC.
- Immediately in front of the subject parcels, there will be access to all urban services, including roads, water, and sewer. Forcing the properties to stay in Rural Reserve is out of alignment with the planned and funded improvements already coming to this area.

3. Compatibility with Kitsap County Comprehensive Plan Environmental Review

- The Tribe has protected these lands within their usual and accustomed areas since time immemorial and takes the role of stewardship very seriously.
- All high value wetlands on property will be protected beyond what is required by federal law, resulting in preservation of nearly 1/3 the total acreage, meaning the "Rural Protection" intent of the parcel stays intact while developable areas are pushed toward the existing highway and existing infrastructure availability.
- The reclassification of the property to Industrial would not result in any new unique or substantially more severe environmental effects beyond those currently addressed by the Draft Environmental Impact Statement (DEIS) for the Comprehensive Plan Update. Alternative 3 of the DEIS assumes the reclassification of the site to Commercial Use. The proposed change from "Commercial" to "Industrial" would result in a similar potential for environmental effects, and certain impacts associated with traffic generation may be less under the Industrial designation.

4. Jurisdictional Support/Awareness

Through meetings and opportunities for consultation, the Tribe has actively worked with the following agencies:

- WSDOT – approved access break and intersection PFA
- City of Bremerton – Presentations to staff and elected officials
- Port of Bremerton – Presentations to staff and elected officials
- Mason County

We appreciate the County's careful consideration of the Skokomish Tribe's request for redesignation of the subject properties as "Industrial," and inclusion within the Urban Growth Area. Please do not hesitate to contact us should you require additional information. I may be called at 360.490.8959 during regular business hours to discuss the Tribe's request. I may also be contacted by email at elees@skokomish.org.

Very Truly Yours,



Charles Miller, Chairman

Skokomish Indian Tribe and S.I.T.E., Inc.

August 22, 2024

Kitsap County Administrator
Attn: Eric Baker
614 Division Street MS-4
Port Orchard, WA 98366

RE: Kitsap County Comprehensive Plan 2024 Periodic Update – Tax Parcel
052301-1-030-2005

Mr. Baker,

We recently met with Mark Goldberg of MBG Co. about Tax Parcel 052301-1-030-2005 which abuts Port Orchard to the South and Bremerton to the east. This property was previously identified as UGA Amendment #79 as part of the 2024 Kitsap County Comprehensive Plan Periodic Update. While the City of Port Orchard previously offered its support of this proposed amendment on the basis of the proposed UL designation, we now understand that Mr. Goldberg is seeking a UM residential designation so that he could construct middle housing types in this location. The City of Port Orchard believes that either a UL or UM designation would be appropriate at this location and that this inclusion of this property in the UGA would create a logical and regular boundary with regard to the topography and critical areas in that location. A UM designation would provide opportunities for more affordable housing types in an area that generally lacks these housing types. Port Orchard remains willing to have this parcel associated with its UGA to allow for future annexation.

Thank you for the opportunity to comment.

Sincerely,

Nicholas Bond

Nicholas Bond, AICP
City Development Director

February 23, 2024

Kitsap County Administrator
Attn: Eric Baker
614 Division Street MS-4
Port Orchard, WA 98366

RE: Kitsap County Comprehensive Plan 2024 Periodic Update

Mr. Baker,

Thank you for the opportunity to provide comments on the proposed alternatives for the Kitsap County 2024 Periodic Update. I am writing on behalf of the City Council and the Mayor to express Port Orchard's support for proposed Alternative 2. While Alternative 3 is also palatable, we believe that Alternative 2 is most consistent with the legal requirements to plan for affordable housing across all income levels. In addition to expressing support for Alternative 2, we would like to offer comments on some other policy proposals in the proposed plan.

1. UGA Amendment #60. The City is neutral on the expansion of the UGA in this area. Port Orchard has concerns about the critical areas impacting these properties but is supportive of the expansion if the County believes that the critical areas that are present do not preclude urban development. Port Orchard is concerned about the proposed industrial designation and would prefer to see a commercial or residential designation in this location.
2. UGA Amendment #79. Port Orchard supports amendment #79 as proposed. This property is bordered on two sides by urban development and the third side is a stream. The proposed urban boundary is both logical and regular. Port Orchard is willing to have this parcel added to its UGA.
3. Phillips Road UGA Contraction: The City understands that the County must size their UGA appropriately and supports the proposed reduction of the UGA east of Phillips Road and North of Sedgwick.
4. Commercial Redesignations: The County has proposed several Commercial redesignations within the Port Orchard UGA. Port Orchard does not object to these redesignations.
5. Increasing SEPA Thresholds: Port Orchard has serious concerns about the County's proposed changes to SEPA thresholds. These concerns could be addressed if the County were to enter an ILA with Port Orchard to ensure that impacts on Port Orchard (especially transportation impacts) from development in

the Port Orchard UGA, are mitigated. We want to ensure that development in the Port Orchard UGA pays its fair and proportionate share toward city transportation projects including but not limited to Bethel Ave, Lund Ave, Tremont Street, and Sedgwick. Perhaps a policy could be added to the County's comprehensive plan that states that the County will enter interlocal agreements with cities adjacent to affiliated UGAs to ensure that transportation impacts caused by development in UGAs are mitigated through the payment of mitigation fees based on trip generation and that the County will not approve development that causes a level of service failure on a city facility. Ultimately, Port Orchard would like to see payment of transportation mitigation fees via an ILA to help fund Port Orchard transportation projects that benefit new development in the Port Orchard UGA. We have successfully conditioned projects outside of the City through SEPA review to ensure that impacts to Port Orchard are mitigated. This opportunity to seek mitigation will be lost if the County increases SEPA thresholds without a framework to mitigate transportation impacts.

6. Transportation Level of Service: Kitsap County should include transportation levels of service for County roads that include segments, intersections, and non-motorized facilities. The current LOS standard in the Comprehensive Plan only adopted a road segment LOS.
7. South Kitsap Fire and Rescue. SKFR has acquired a property just outside of the Port Orchard UGA for a new fire station. This property, parcel 052301-3-014-2001 should be added to the UGA with a public facility designation to allow for the construction of a fire station connection to public sewer.
8. UGA Amendment #66: The City objects to the proposed addition of rural commercial lands at the intersection of SR-16 and Mullenix Road. The site of this proposed change in land use designation is encumbered by a type F stream, wetlands, and has indications for geologic hazards. The proposal is inconsistent with the countywide planning policies and Vision 2050 concerning rural development and the protection of critical areas. The proposal is also inconsistent with the goals of the growth management act concerning reducing sprawl, protecting the environment, and for rural development. The proposed redesignation is not supported by rural employment growth targets as found in the countywide planning policies and should be denied. Additional employment growth in rural areas should be prioritized in rural centers, not on lands encumbered by critical area resources. There is ample commercial land capacity proposed in the Port Orchard UGA along Bethel Avenue South, near this location. An expansion of rural commercial land in this location is not warranted.

Thank you for the opportunity to comment.

Sincerely,

Nicholas Bond

Nicholas Bond, AICP
City Development Director

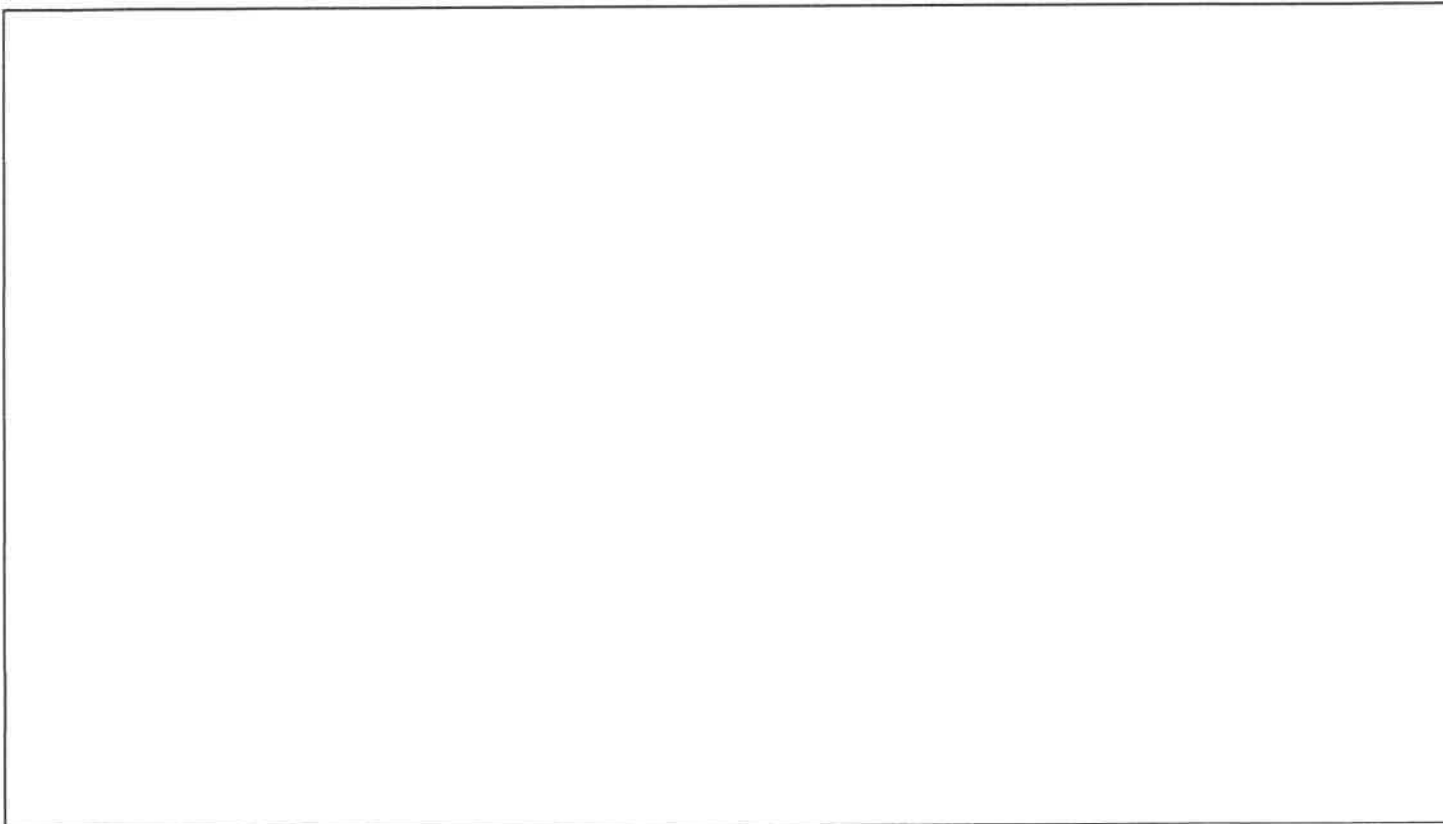
Modern Age Dinosaurs

By: Micah Stephenson

How bulldozers are like dinosaurs and are causing another seismic event and eventually another grand canyon.

See sources cited at bottom of the page.

Geology



DURATION: 4 minutes, 10 seconds

Have you ever wondered how the Grand Canyon was formed and why it is found here in Northern Arizona? To understand the formation of the canyon, there is a simple way to remember how it was shaped over time. All you have to remember are the letters D U D E or dude. The letters stand for: Deposition, Uplift, Down cutting and Erosion.

A distinct and ordered combination of geologic events.

The story begins almost two billion years ago with the formation of the igneous and metamorphic rocks of the inner gorge. Above these old rocks lie layer upon layer of sedimentary rock, each telling a unique part of the environmental history of the Grand Canyon region.

Then, between 70 and 30 million years ago, through the action of plate tectonics, the whole region was uplifted, resulting in the high and relatively flat Colorado Plateau.

Finally, beginning just 5-6 million years ago, the Colorado River began to carve its way downward. Further erosion by tributary streams led to the canyon's widening.

Still today these forces of nature are at work slowly deepening and widening the Grand Canyon.



Horizontal striations can be found in the walls of the majority of the canyon.

Rock deposition

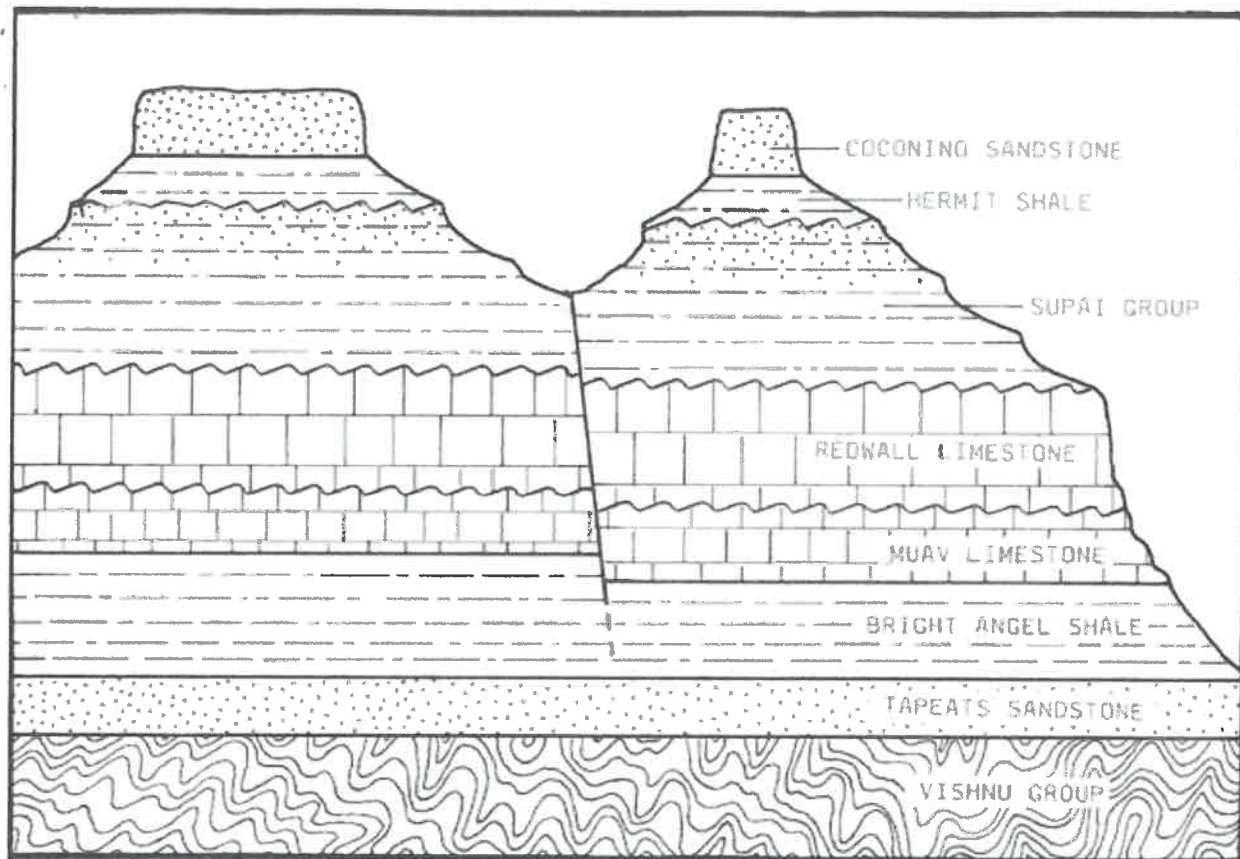
The story of how Grand Canyon came to be begins with the formation of the layers and layers of rock that the canyon winds through. The story begins about 2 billion years ago when igneous and metamorphic rocks were formed. Then, layer upon layer of sedimentary rocks were laid on top of these basement rocks.

To look at rock layers, geologists use a diagram called a stratigraphic column. It shows the rock layers with the oldest on the bottom, and the youngest on the top. That means that the bottom layer was formed first, and every

subsequent layer was formed later, with the youngest rocks on the top.

In geology, this is referred to as the principle of superposition, meaning rocks on the top are generally younger than rocks below them.

Another important principle is the principle of original horizontality. This means that all the rock layers were laid horizontally. If rock layers appear tilted, that is due to some geologic event that occurred after the rocks were originally deposited.



Grand Canyon striations.

Colorado Plateau uplift

The Kaibab Limestone, the uppermost layer of rock at Grand Canyon, was formed at the bottom of the ocean. Yet today, at the top of the Colorado Plateau, the Kaibab Limestone is found at elevations up to 9,000 feet. How did these sea floor rocks attain such high elevations?

Uplift of the Colorado Plateau was a key step in the eventual formation of Grand Canyon. The action of plate tectonics lifted the rocks high and flat, creating a plateau through which the Colorado River could cut down.

The way in which the uplift of the Colorado Plateau occurred is puzzling. With uplift, geologists generally expect to see deformation of rocks. The rocks that comprise the Rocky Mountains, for example, were dramatically crunched and deformed during their uplift. On the Colorado Plateau, the rocks weren't altered significantly; they were instead lifted high and flat.

Just how and why uplift occurred this way is under investigation. While scientists don't know exactly how the uplift of



The start of the South Kaibab trail shows an abundant display of Kaibab stone.

the Colorado Plateau occurred, a few hypotheses have been proposed. The two currently favored hypotheses call for something called shallow-angle subduction or continued uplift through isostasy.

Subduction

Continued Uplift

What is a Valley? What is a Canyon?

A valley is a landform characterized by a low-lying area of land surrounded by high areas, such as mountains or hills. Valleys can be a wide variety of shapes and sizes. They are either erosional features, carved by water or glacial ice, or structural features, caused by rifting.

A canyon is a type of erosional valley with extremely steep sides, frequently forming vertical or nearly vertical cliff faces. The term "gorge" is often used interchangeably with "canyon" and generally implies a smaller, particularly narrow feature.

Water-carved Canyons

Glacial Valleys

Rift Valleys

How did the Colorado River carve such a big canyon?

The Colorado River has been carving away rock for the past five to six million years. Remember, the oldest rocks in Grand Canyon are 1.8 billion years old.

The canyon is much younger than the rocks through which it winds. Even the youngest rock layer, the Kaibab Formation, is 270 million years old, many years older than the canyon itself.



Geologists call the process of canyon formation downcutting. Downcutting occurs as a river carves out a canyon or valley, cutting down into the earth and eroding away rock.

Downcutting happens during flooding. When large amounts of water are moved through a river channel, large rocks and boulders are carried too. These rocks act like chisels, chipping off pieces of the riverbed as they bounce along.

Several factors increase the amount of downcutting that happens in Grand Canyon: the Colorado River has a steep slope, a large volume, and flows through an arid climate.

The Colorado River has a Steep Slope

The Colorado River has a Large Volume

The Colorado River flows through an Arid Climate



A dynamic place

Weathering and erosion are ongoing processes. If we were to visit Grand Canyon in another couple million years, how might it look?

For one, it would be wider; we may not even be able to see across it anymore. Much of Grand Canyon's width has been gained through the erosive action of water flowing down into the Colorado River via tributaries. As long as water from snow melt and rain continues to flow

in these side drainages, erosion will continue.

In a few million years, Grand Canyon also may be a bit deeper, though the canyon isn't getting deeper nearly as fast as it is getting wider. The rocks through which the river is currently downcutting are hard, crystalline igneous and metamorphic rocks, which are much stronger than the sedimentary rocks resting above them. More importantly, the river's gradient has decreased, such that it has less power to battle with the hard rocks.

Finally, the river's elevation near Phantom Ranch, a popular hiking destination in the canyon, is just 2,400 feet above sea level. Because sea level (0 ft.) is the ultimate base level for all rivers and streams, upon reaching sea level, the Colorado River will be done downcutting.

How has the Glen Canyon Dam changed the Colorado River's flow?

Volcanism

Faulting

How old is Grand Canyon and the Colorado River?

Landscapes are more difficult to date than rock formations. Still, by looking at relationships between rock formations, scientists are able to determine ages of landscapes with some precision. Scientists have used this type of relative dating technique to narrow the age of the Colorado River and Grand Canyon.

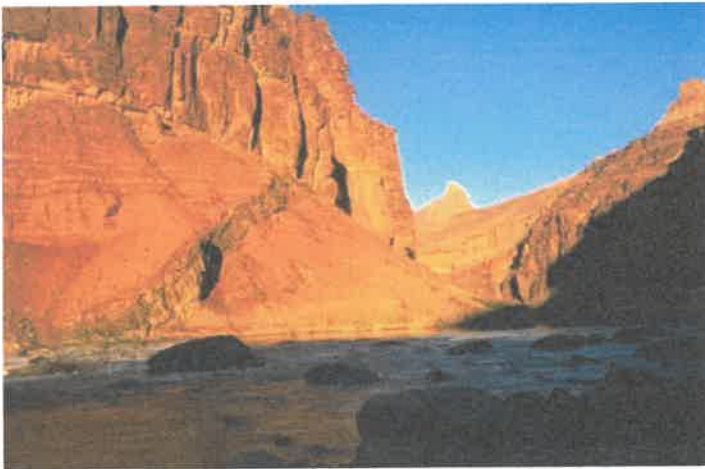


Scientists know that the Colorado River carved Grand Canyon. The river is thus slightly older than the canyon, though the two are certainly close in age.

Scientists have studied rock deposits along course of the present day Colorado River. By looking at the type of sediments the deposits contain, scientists determine whether or not the rocks were deposited by the river.

Rocks deposited by the river are younger than the river, as the river needed to be around to deposit them. Rocks not deposited by the river are older than the river because the river was not yet there to drop them.

When possible the scientists then date these rock deposits. The age of the river falls between the rocks determined to be older than the river and those determined to be younger. Through this method, scientists have estimated an age for the river, and thus the canyon through which it flows, of 5-6 million years.

Hualapai Limestone (6 - 11 million years ago)**Sandy Point Basalt (4.4 million years ago)****Bouse Formation (~ 5 million years ago)****Imperial Formation (4.3 - 5 million years ago)****Opening of the Gulf of California (~ 5.5 million years ago)****How did the Colorado River and the canyon come to be?**

It is fairly easy to explain the formation of Grand Canyon through downcutting, weathering, and erosion. It is more difficult to explain just how the Colorado River came to be in its current location.

We can think of the development of the Colorado River as a history book with many chapters. The most recent chapter is familiar, because it is the chapter that is visible

today. But, there are a number of chapters missing. The plotlines of some of those missing chapters are heavily debated.

There are a few chapters in the story that the majority of geologists agree upon. For one, evidence collected thus far suggests that the upper and lower reaches of the Colorado River are different ages.

The lower section in California, Nevada, and Arizona is younger than the upper portion in Utah and Colorado. The age of the younger portion of the river is estimated to be between 5 and 6 million years based on the various constraints listed in the Ages section.

The older portion, or “ancestral Colorado River,” is at least 7 million years old and may even be 10 million years old, based on the presence of river gravels found near Grand Junction, Colorado. When the upper and lower portions combined, an event called drainage integration, the Colorado River became what it is today.

In other words, the river that we know today as the Colorado River, was actually once either two different rivers that



FULL TEXT LINKS



J Theor Biol. 2018 Dec 14;459:154-161. doi: 10.1016/j.jtbi.2018.10.010. Epub 2018 Oct 5.

The seismic wave motion camouflage of large carnivorous dinosaurs

R Ernesto Blanco ¹, Washington W Jones ², Nicolás Benech ³

Affiliations

PMID: 30296449 DOI: 10.1016/j.jtbi.2018.10.010

Abstract

Living elephants produce seismic waves during vocalizations and locomotion that are potentially detectable at large distances. In the Mesozoic world, seismic waves were probably a very relevant source of information about the behavior of large dinosaurs. In this work, we study the relationship between foot shape and the directivity pattern of seismic waves generated during locomotion. For enlarged foot morphologies (based on a morphological index) of theropod dinosaurs, there is a marked effect of seismic wave directivity at 20 m. This effect is not important in the foot morphologies of other dinosaurs, including the foot shapes of herbivores and theropods such as therizinosaurs. This directivity produces a lower intensity in the forward direction that would slightly reduce the probability of detection of an ambush predator. Even more relevant is the fact that during the approach of a predator, the intensity of seismic waves detected by potential prey remains constant in the mentioned distance range. This effect hides the predator's approach, and we call this "seismic wave camouflage". We also discuss the potential relationship of this effect with enlarged fossil footprints assigned to metatarsal support.

Keywords: Dinosaurs; Fossil footprints; Prey flight distance; Redator-prey interactions; Seismic waves.

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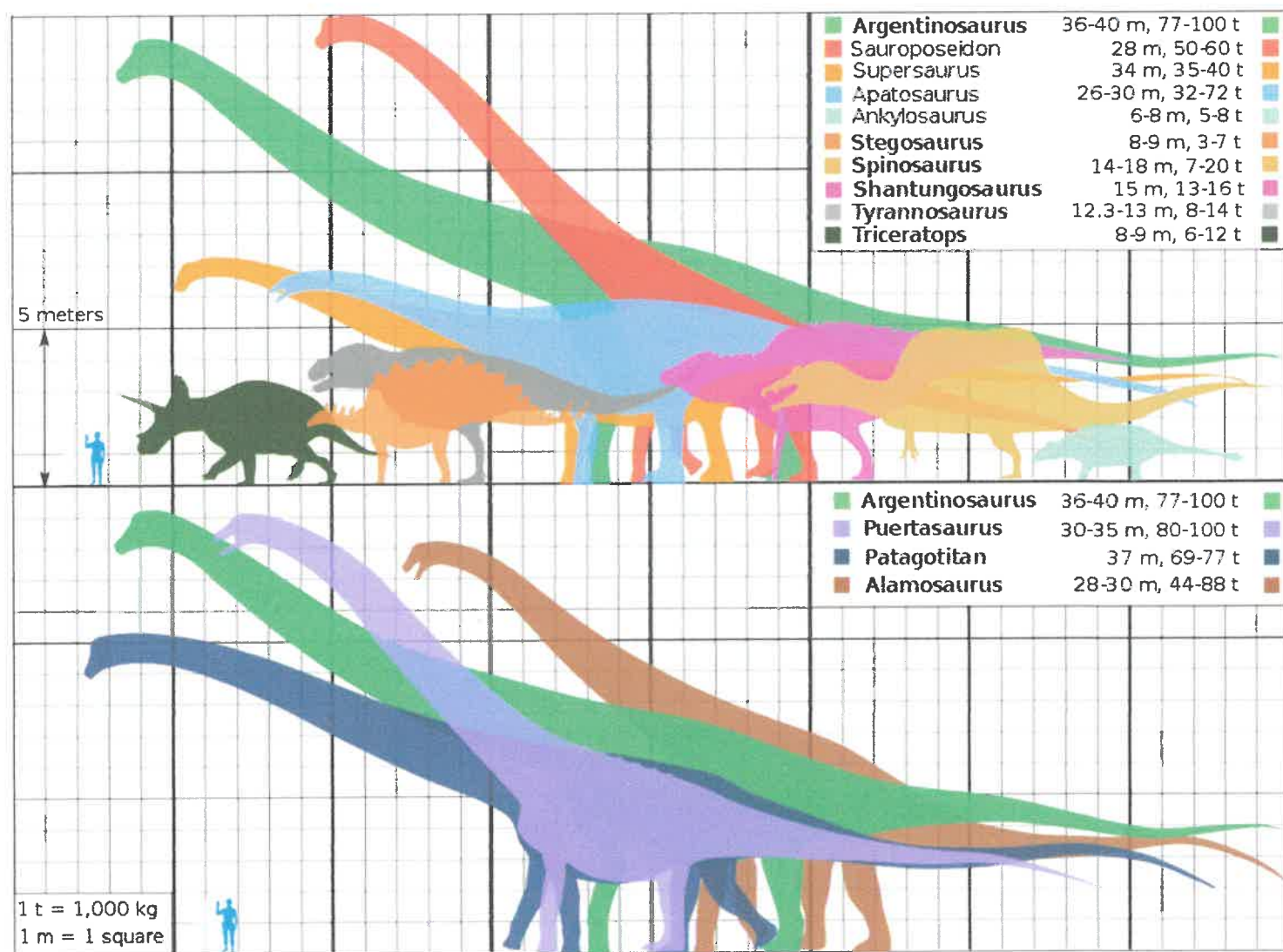
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When you think about construction equipment, a bulldozer is likely one of the first machines that comes to mind. But have you ever wondered **how much a bulldozer weighs**? Understanding the weight of a bulldozer can help you appreciate the power and capabilities of these impressive machines.

The weight of a bulldozer depends on its size and features. It can be influenced by factors such as attachments and additional equipment, which can add to the overall mass. Knowing the weight of the bulldozer you're working with is crucial in terms of safety, transport options, and the types of projects it can tackle effectively.

Read: [How Much Do Saddles Weigh? \(Quick Guide for Horse Riders\)](#)

Smaller bulldozers can weigh around 7 to 8 tons, while larger ones can weigh up to 150 tons or more. The weight of crawler bulldozers can

range from 8 tons for smaller models to over 120 tons for the largest ones.

Wheel bulldozer weights can vary from around 15 tons for smaller models to 40 tons for larger ones.

Mini bulldozer weights usually range between 7 and 10 tons.

Measuringly.com

Table of contents

Understanding Bulldozers

cascadia fault line

All Images Video Filter



Cascadia Megathrust



Cascadia Tsunami Map



Cascadia Fault Map



Cascadia Fault Zone



Cascadia Megaquake



Cascadia Region Map





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Seattle Underground

The **Seattle Underground** is a network of underground passageways and basements in the Pioneer Square neighborhood of Seattle, Washington, United States. They were located at ground level when the city was built in the mid-19th century but fell into disuse after the streets were elevated. In recent decades, they have become a tourist attraction, with guided tours taking place around the area.

History

At approximately 2:20 p.m. on June 6, 1889, an accidentally overturned glue pot in a carpentry shop started the most destructive fire in the history of Seattle. After this Great Seattle Fire,^{[1][2]} new construction was required to be of masonry, and the town's streets were regraded one to two stories higher. Pioneer Square had originally been built mostly on filled-in tidelands and often flooded. The new street level also kept sewers draining into Elliott Bay from backing up at high tide.

For the regrade, the streets were lined with concrete walls that formed narrow alleyways between the walls and the buildings on both sides of the street, with a wide "alley" where the street was. The naturally steep hillsides were used and, through a series of sluices, material was washed into the wide "alleys", by raising the streets to the desired new level, generally 12 feet (3.7 m) higher than before, in some places nearly 30 feet (9.1 m).

At first, pedestrians climbed ladders to go between street level and the sidewalks in front of the building entrances. Brick archways were constructed next to the road surface, above the submerged sidewalks. Vault lights (a form of walk-on skylight with small panes of clear glass which later became amethyst-colored) were installed over the gap from the raised street and the building, creating the area now called the Seattle Underground.

When they reconstructed their buildings, merchants and landlords knew that the ground floor would eventually be underground and the next floor up would be the new ground floor, so there is very little decoration on the doors and windows of the original ground floor, but extensive decoration on the new ground floor.



The Seattle Underground. The facade seen here was at street level in the mid-1800s.



Start of the Great Seattle Fire, looking south on 1st Avenue near Madison Street

Once the new sidewalks were complete, building owners moved their businesses to the new ground floor, although merchants carried on business in the lowest floors of buildings that survived the fire, and pedestrians continued to use the underground sidewalks lit by the vault lights (still seen on some streets) embedded in the grade-level vaulted sidewalk above.

In 1907, the city condemned the Underground for fear of bubonic plague, two years before the 1909 World Fair in Seattle (Alaska-Yukon-Pacific Exposition). The basements were left to deteriorate or were used as storage. Some became illegal flophouses for the homeless, gambling halls, speakeasies, and opium dens.

Tours

Only a small portion of the Seattle Underground has been restored and made safe and accessible to the public on guided tours. In 1965, local citizen Bill Speidel formally created "Bill Speidel's Underground Tour", which continues to operate from the Pioneer Building and adjacent buildings.^[3] The tour route passes disused storefronts, artifacts, and multiple tunnel entrances.^[4]

A second tour, Beneath the Streets, was created in 2013 and uses other sections of the Underground network.^[5]

See also

- Catacombs of Paris
- Catacombs of Rome
- Edinburgh Vaults
- Mary King's Close
- Manchester Cathedral Steps
- Raising of Chicago
- Shanghai tunnels (less commonly known as the Portland Underground, in Portland, Oregon)
- Underground Atlanta
- Underground City, Montreal, modern construction of interconnected office buildings, hotels, shopping centers and other venues in Montreal's CBD
- Underground City (underground features in cities around the world)

References

1. "Seattle in Ashes" (<http://chroniclingamerica.loc.gov/lccn/sn85042460/1889-06-07/ed-1/seq-5/>). *Los Angeles Daily Herald*. June 7, 1889. p. 5.
2. "The P-I error that changed Seattle history" (<http://www.seattlepi.com/local/article/The-P-I-error-that-changed-Seattle-history-1531131.php#page-2>). *Seattle Post-Intelligencer*. July 22, 2011.



A view looking upwards at the vault lights (glass skywalks). The roof of a building at previous street level; now the top of the glass is walked upon and forms the current sidewalk.




The concrete floor of the former meat market was originally at the level of the wooden platform on the left but sank over time because of decomposing sawdust fill.

3. Coppard, Patricia (July 1, 2019). "Fascinating tales below: Touring the tunnels under Seattle's Pioneer Square" (<https://www.timescolonist.com/life/travel/fascinating-theses-below-touring-the-tunnels-under-seattles-pioneer-square-4674021>). *Times Colonist*. Retrieved February 14, 2022.
4. Lyke, M.L. (January 7, 2001). "The Inside Story: Going Underground in Seattle" (<https://www.washingtonpost.com/archive/lifestyle/travel/2001/01/07/the-inside-story-going-underground-in-seattle/bc9e2f78-1f73-46e0-b313-cab1fc691d70/>). *The Washington Post*. p. 3. Retrieved January 26, 2022.
5. McKenzie, Madeline (June 3, 2015). "Remembering the Great Fire that forged Seattle's resilience" (<https://www.seattletimes.com/entertainment/remembering-the-great-fire-that-forged-seattles-resilience/>). *The Seattle Times*. Retrieved February 14, 2022.

Further reading

- Speidel, Bill (1978). *Doc Maynard, The Man Who Invented Seattle* (<https://archive.org/details/docmaynardmanwho00spei>). Nettle Creek. ISBN 0-914890-02-6.
- Speidel, Bill (1990). *Sons of the Profits* (<https://archive.org/details/sonsofprofits00will>). Nettle Creek. ISBN 0-914890-06-9.

External links

-  Media related to Seattle Underground at Wikimedia Commons
 - Mashable: 1905-1930 The Seattle Regrade (<http://mashable.com/2015/08/18/building-seattle/#wIzJtxL0Okqt>)
-

Retrieved from "https://en.wikipedia.org/w/index.php?title=Seattle_Underground&oldid=1227616211"

Comments at KCAC meeting 9-11-24

I'm Beverly Parsons from Hansville.

Thank you, commissioners and staff for the incredible amount of work you have done on the Comprehensive Plan draft.

I would like to call attention to what I consider the most significant change from the December version—the change in the vision. The vision is no longer a set of individual elements such as land use, transportation, housing, and so on.

You have changed that. You now say that vision is for the county to be a *community*. The document still has those elements but now you have provided a vision of what the interconnected **result** is to be. It's a community of a particular type— an engaged, connected, safe, healthy and livable, resilient, vibrant, and well-governed community.

Over the last couple years that I've been reviewing and commenting on the Comp Plan drafts, I have observed that the focus has not been on a desired type of community but rather on continually attempting to balance the interests of one group with another, balance one element with another. The result is multiple well-meaning people making attempts at balancing interests around specific issues rather than attending to what our County as a whole is gradually becoming.

Now you have stated a vision of what the county is to become—a particular type of overall community. A community is a dynamic living *system* not a collection of separate elements. It is very different to use a systems thinking approach to planning than one focused on separate elements.

For example, here are a few habits of a systems thinker:

1. you do not seek to maximize any one part but rather optimize the whole.
2. you identify the circular nature of complex cause and effect relationships.
3. Widely representative groups in the community come together to seek to understand and strategize for the big picture. It's not a few groups here and there pushing their own agenda.

Thank you for setting this new course. I hope there will be opportunities to play out what this means in practice.

From: [Berni Kenworthy](#)
To: [Amanda Walston](#); [Comp Plan](#)
Cc: [Eric Baker](#); [Colin Poff](#)
Subject: Comprehensive Plan Update - Comments to Draft Development Code Regulations
Date: Tuesday, September 24, 2024 1:18:54 PM
Attachments: [image001.png](#)

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Dear Kitsap County Planning Commission,

Please find the following general comments to the development code updates being proposed as part of the county's comprehensive plan update.

KCC 16.040.050(G) – SENT UNDER SEPARATE COVER

KCC 16.040.050(J)

Consider adding language that allows the division of land for public purposes to create non-conforming lots. For example, what if one acre is needed out of five acres in a rural residential zone for a sewer pump station or five acres is needed in an rural protection zone for a park? Does this section preclude this since non-conforming lots would be created as part of the subdivision?

KCC 16.10.XX Boundary line adjustment.

This definition is inconsistent with proposed language in KCC 16.040.050(G.2.b).

KCC 16.24.040(I.3.c)

What is the problem that's trying to be addressed by adding "centrally." Many considerations including topography, parcel shape etc. can impact the placement of the recreational space. The language "in a manner that affords good visibility" helps mitigate the potential of recreational area from being placed out of sight. If the "central" part of the project is a steep area, will the applicant be required to grade/place walls etc. to create an area adequate for a rec space?

KCC 16.40.040(B.2.e)

comment regarding existing code language

I just had a situation where the applicant for a plat needed an offsite easement from a neighboring property for a storm outfall. That property owner was willing to give an easement, but preferred to do a BLA to give ownership of the area to the applicant. Even though it was preferable for the applicant to own that land, a BLA would have triggered a major amendment (i.e., plat boundary would have expanded). I understand this language if the perimeter boundary change is done to increase density, but this is an example of an unintended consequence that should be considered.

KCC 16.40.040(B.2.i)

comment regarding existing code language

What if the access change, whether it be moving the location of access or adding a new location, results in safer vehicular and/or pedestrian safety? Would that trigger a major amendment? What if the access change is the result of a hearing examiner condition of approval?

KCC 17.490.030(A.2)

comment regarding existing code language

It is not common for applicants to request an increase to the required parking standard. However, speaking from a recent experience, this increase provision is tough when popularity of a business warrants more parking yet a variance can't be supported because variance criteria does not include the success of a business as a factor. Consider allowing a 25% increase to avoid unnecessary process.

KCC 17.495.030(E)

The first sentence is not a complete sentence.

KCC TABLE 17.495.030-2

Why are deciduous replacement trees provided half of the credits of a conifer?

KCC 17.495.050

Street trees planted along newly designed ROW internal to a new plat should count as replacement trees.

KCC 17.495.060

“Critical root zone” is not defined in the proposed code.

KCC 18.04.090(B)

Curious why the following exempt levels were removed from the draft for Title 18:

B. The county establishes the following exempt levels for minor new construction under WAC 197-11-800(1) (d):

- 1. Up to fifteen (15) units for single family attached residential projects or subdivisions where the total square footage of individual units does not exceed 1,500 square feet in regional or countywide centers.*
- 2. Up to twenty (20) units for single family attached residential projects or subdivisions where the total square footage of individual units does not exceed 1,500 square feet in all UGA areas outside of regional or countywide centers*
- 3. Up to thirty (30) units for multifamily projects or subdivisions in regional or countywide centers.*
- 4. Up to twenty (20) units for multifamily projects or subdivisions in all UGA area outside of regional or countywide centers.*

Thank you for your consideration,
Berni



Berni Kenworthy, MSE, PE
Owner at Axis Land Consulting

PO Box 596
Poulsbo, WA 98370

Mobile: 360-509-3716

Email: berni.kenworthy@axislandconsulting.com

From: [Berni Kenworthy](#)
To: [Amanda Walston](#); [Eric Baker](#); [Colin Poff](#); [Comp Plan](#)
Subject: RE: Comprehensive Plan Update - Comments to Proposed Development Regulation Amendments
Date: Tuesday, September 24, 2024 12:16:36 PM
Attachments: [image001.png](#)

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Correction to the citation below: 16.04.050(G)

From: Berni Kenworthy
Sent: Tuesday, September 24, 2024 12:00 PM
To: awalston@kitsap.gov; Eric Baker <Ebaker@kitsap.gov>; Colin Poff <CPoff@kitsap.gov>; compplan@kitsap.gov
Subject: Comprehensive Plan Update - Comments to Proposed Development Regulation Amendments

Eric and Colin,

Thank you for meeting on September 4th regarding the final draft comprehensive plan documents. I have the following comments on KCC 16.05.050(G) for consideration by staff, the Planning Commission, and Board of County Commissioners:

TITLE 16 – LAND DIVISION

16.05.050(G)

New language related to boundary line adjustments (BLA) has been included in the most recent update. It is unclear what problem these changes are trying to address, and I am certain that more problems will be created than solved by this proposed change. Since this language has not appeared in previous development regulation draft updates, please consider holding off on changes to this portion of the code in order to engage local licensed surveyors and other members of the public who may not be closely following the comprehensive plan update.

For perspective, in the past decade an average of 9.5 BLAs are recorded each month which amounts to a very small fraction of monthly or even weekly recordings (also a very small fraction of development permits submitted annually). I reviewed all (79) BLAs recorded in 2023 and the purpose of the BLAs fell into one of the following categories:

- 61% BLA adjusted lot lines to resolve actual lines of occupation/use between neighbors (i.e., adjust the lot line to follow a building, yard, or use)
- 10% BLA adjusted lots to provide improved access
- 9% BLA adjusted a lot line by a nominal amount (5' or less)
- 8% Purpose of the BLA was unclear to me from recorded documentation
- 6% BLA was used to aggregate lots
- 4% BLA adjusted lot lines to avoid critical areas
- 3% BLA was re-recorded to correct an error

The proposed code language is italicized and my comments are below each section:

The provisions of Chapters 16.40, Subdivisions; 16.48, Short Subdivisions; and 16.52, Large Lot Subdivisions, shall apply to all divisions and redivisions of land for the purposes of sale, lease or other transfer of ownership except:

A boundary line adjustment, provided that it complies with the following:

1. *The BLA is applied only to lots that were legally created and not to unbuildable tracts, such as common area or open space tracts, vacated rights of way, utility easements, or tax title strips.*

Many situations exist where a BLA is a viable mechanism to address lines of occupation adjacent to an open space or common area tract (for example, see AFN 201811300232).

2. *The BLA does not result in:*

- a. *Any new lots; the same number of lots must exist both before and after unless the BLA proposes to combine lots.*

No issues. By definition, BLAs cannot create additional lots.

- b. *Any lots that do not meet the lot width or depth of the zone or result in a lot with greater density than allowed by code.*

This language would prohibit two neighboring lots from resolving lines of occupation. What if the original lots were non-conforming and didn't meet the lot width or depth of the current zone? This would also prohibit public utilities from performing BLAs to create a needed land configuration for things like substations, reservoirs, wells, pump stations, and fiber optic nodes. Public utilities do not always require parcel sizes required by zoning or they may need a configuration that is different than required dimensional standards.

- c. *Any lots that do not have sufficient area for adequate utilities, including stormwater, sewage disposal and water, or adequate vehicle access, including emergency access.*

This language does not consider that these items could be addressed by offsite easements on a neighboring parcel. Will you require a stormwater, septic, utility and access design be performed in order to prove out proposed lot configurations? If you consider that the majority of BLAs are to resolve lines of occupation, this language creates unnecessary work and costs that will be borne by a property owner as well as unnecessary additional review by county auditor staff.

- d. *Any conforming lot becoming nonconforming.*

Note that of the 79 BLAs recorded in 2023, **NONE** resulted in a new non-conforming lot. What if a BLA is needed between a conforming and non-conforming lot to resolve lines of occupation and the conforming lot becomes non-conforming and the non-conforming becomes conforming? Strict application of this language would preclude a BLA in this instance. The creation of non-conforming lots is not a rampant issue (at least not in 2023), but this language precludes many legitimate BLAs that are commonly proposed.

- e. *Any lot having more than one zoning, land use, or overlay designation.*

Again, this precludes situations where a BLA is needed to address lines of occupation, access, or critical areas. In 2023, five BLAs resulted in split-zone parcels. ***It is important to note that one of the split zones was recorded by Kitsap County Public Works for the Norwegian Point Restoration Project. Public Works BLA would not be allowed pursuant to this language.***

- f. *Any lot with a configuration that is consistent with applicable plat conditions.*

This is extremely ambiguous language that is subject to a myriad of interpretations. I honestly don't know what it means or what is trying to be addressed.

3. The BLA does not create or contribute to the need for a variance or other reduction or exemption from Kitsap County development code standards.

It is unreasonable to expect the auditor's office to make this determination at the time of recording. This is not their job nor area of expertise.

4. The BLA must occur with contiguous lots.

This language precludes a BLA across a right-of-way when it is common that lots technically extend to center of ROW or across a ROW. It is unclear what this language is attempting to address.

5. The BLA must not circumvent platting procedures.

This is also extremely ambiguous language that is subject to a myriad of interpretations. If the BLA is not creating any new lots (i.e., a subdivision), it is unclear how a BLA could possibly circumvent platting procedures. If this is trying to prevent instances where lots are reconfigured to make them more easily buildable and the new lot configuration has the appearance of a plat, then there should be further discussion to address the county's actual concerns. As written, this language is far too ambiguous to implement.

It is VERY disappointing that this language was inserted this late in the code update process without engaging local surveyors and other stakeholders. The unintended consequences of the language as written will absolutely lead to the prohibition of many viable, legitimate BLAs. I have only highlighted a few examples, but many more exist. Please consider pulling this revised language from the proposed code update and creating a separate process that engages experts in boundary law, real estate transactions, and engineering. It is clear that this language is attempting to solve a perceived problem by the county. The questions that should be asked and vetted with stakeholders are:

1. What precisely is/are the problem(s) trying to be solved by changing this section of code?
2. What is the frequency of said problem?
3. Is it necessary from a time, cost, and resources perspective to implement code changes to address said problem?

Please do not rush the public process by adopting this language as written. There are far too many unintended consequences to members of the public.

Thank you for your consideration,
Berni



Berni Kenworthy, MSE, PE
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From: [Gary Letzring](#)
To: [Amanda Walston](#); [Eric Baker](#); [Colin Poff](#); [Comp Plan](#)
Cc: [Gunnar Fridriksson](#); [Kenneth Swindaman](#); wodale@gps-surveyor.com; [Horton, Kristina \(BRPELS\)](#); [Icenhower, David \(DNR\) \(David.Icenhower@dnr.wa.gov\)](#); [Beehler, Pat \(DNR\)](#)
Subject: Boundary Line Adjustment - Comments
Date: Tuesday, September 24, 2024 12:54:52 PM
Attachments: [BLA Model Ordinance v1.4.pdf](#)

[CAUTION: This message originated outside of the Kitsap County mail system. **DO NOT CLICK on links or open attachments** unless you were expecting this email. If the email looks suspicious, contact the Helpdesk immediately at 360-337-5555, or email at Helpdesk@kitsap.gov]

Hi Kitsap County:

In review of the proposed changes to Title 16 – regarding a Boundary Line Adjustment, I would encourage you to review the attached Boundary Line Adjustment Model Ordinance. This document was created by the Washington State DNR Survey Advisory Board, and they have been recommending this Model Ordinance for several years now to municipalities and communities that do not have an ordinance already (or need to modify an existing). This BLA Model Ordinance has been reviewed by numerous Planning departments, Auditor's, Attorneys and Professional Land Surveyors and provides what the SAB feels as the minimum basic items needed for a Boundary Line Adjustment and compliance with state law.

I would encourage your review of the attached BLA Model Ordinance prior to making any decision, as the document was created specifically for this purpose. Literally, hundreds and hundreds of hours have gone into the making of the document.

Having recorded a few Boundary Line Adjustments in Kitsap County myself, a change is definitely needed. But the current proposed language seems haphazard and I don't think this will do what is actually needed or desired for County Planning and the Public.

If you have any questions, please do not hesitate to reach out to the DNR Public Land Survey Office, your county surveyor Ken Swindaman, the Washington State Survey Advisory Board or myself.

Thank you.

Gary Letzring, P.L.S.
Urban Member of the Survey Advisory Board,

Explanatory Paper for Boundary Line Adjustment Model Ordinance and Affidavit Version 1.0

Purpose: Identify issues with current practices. Reveal Chain of Title issues. Create better protection for the public. Current statutes are problematic with no clear guidance. Provide a model ordinance for all jurisdictions in Washington to adopt.

Current requirement in statute is:

WAC 458-61A-109 (4) **Documentation.** In all cases, an affidavit is required to record the new property line.

Applicable Statutes and Opinions (See Appendix A)

RCW 58.17.04 Chapter inapplicable when (6)

RCW 58.04.007 Affected landowners may resolve dispute over location of a point or line—Procedures.

RCW 65.04.045 Recorded instruments—Requirements—Content restrictions—Form.

RCW 84.56.345 Alteration of property lines—Payment of taxes and assessments.

WAC 332-130-050 Survey map requirements.

WAC 458-61A-109 Trading/exchanging property and boundary line adjustments.

AGO 1986 No. 6 - Mar 21 1986 -- REDIVISION -- SHORT SUBDIVISION --
ADJUSTING BOUNDARY LINES

AGO 2005 No. 2 Authority of county to impose procedural requirements on recording of property boundary disputes resolved by agreement.

Issues that exist:

1. No consistency throughout the state for boundary line adjustment process.
 - a. Each jurisdiction has its own procedures.
2. No public record as a result of the process in numerous jurisdictions.
 - a. Jurisdictions may or may not file anything of importance.
3. No ability for Title Companies to pick up written/ recorded boundary changes.
 - a. Boundary line adjustments with descriptions are not typically in public record.
4. Protection of the public is not in place.
 - a. Land ownership is a paramount part of our freedoms.
 - b. Paper title should not have color of title due to poor land use actions.
 - c. Correct legal descriptions are not in title record.
 - d. The Assessor is not the place for public record of legal descriptions.

5. Lenders are generally not involved.
 - a. Boundaries are changed without Deeds of Trust being modified.
 - b. Foreclosures become a title and ownership nightmare.
6. Surveys and or surveyors are not part of the standard process for BLA procedures.
 - a. Sketches may only be rough, performed by the public or planning department and kept in house.
 - b. Records of Surveys are not typically required.
 - c. No recorded maps for title identification or understanding of legal descriptions.

Solution:

1. Create a minimum consistency requirement for the boundary line adjustment process through a model ordinance for all of the jurisdictions in Washington State.
2. Require Professional Land Surveyors as part of the process in creating new land descriptions and maps at a minimum.
3. Assure vested parties of parcels are included in the process for approvals or releases of interest.
4. Create a minimum set of approved and completed Boundary Line Adjustment documents, recorded with the County Auditor as the public record to establish a more clear chain of title. This could be all part of the Affidavit currently required by WAC 458-61A-109.

Examples of Adjustments:

Same ownerships or entities with same owner (Grantor/Grantee issues):

- ***Joe Smith owns Lot 4 and Smith Living Estate owns Lot 5 with Joe as the Executive***
 - *Will there be at least a deed? Not in my experience.*
- ***123 LLC owns Lot 4 and ABC LLC owns Lot 5, both are owned by Mr. Johns.***
 - *There may never be a deed!*
- ***Jean Block owns Lot 4 and Lot 5***
 - *There will not be a deed*

Different ownerships: Obvious for owners or is it?

Examples:

- ***Joe Smith owns Lot 4 and Jean Block owns Lot 5***
 - *Should have a deed recorded.*
- ***456 LLC owns Lot 4 and XYZ LLC owns Lot 5, 456 LLC ownership is 3- 33% owners and XYZ LLC ownership is 3-33% owners with one owner different than 456 LLC***
 - *Confusion will persist without legal descriptions being recorded. Good luck with the Assessor and tax assessment.*
- ***Joe Smith owns Lot 4 individually and Joe Smith and wife Mary Smith owns Lot 5***
 - *Will a deed or anything get recorded for this BLA?*

There is no mention of lenders in these examples which could complicate future deeds.

Solution:

Create a Model Boundary Line Adjustment Ordinance to provide consistency throughout the state for jurisdictions to adopt and provide an example affidavit sufficient to correct the issues that exist as required to be filed in WAC 458-61A-109 (4) .

Appendix A

RCW 58.04.007 Affected landowners may resolve dispute over location of a point or line—Procedures.

Whenever a point or line determining the boundary between two or more parcels of real property cannot be identified from the existing public record, monuments, and landmarks, or is in dispute, the landowners affected by the determination of the point or line may resolve any dispute and fix the boundary point or line by one of the following procedures:

(1) If all of the affected landowners agree to a description and marking of a point or line determining a boundary, they shall document the agreement in a written instrument, using appropriate legal descriptions and including a survey map, filed in accordance with chapter [58.09](#) RCW. The written instrument shall be signed and acknowledged by each party in the manner required for a conveyance of real property. The agreement is binding upon the parties, their successors, assigns, heirs and devisees and runs with the land. The agreement shall be recorded with the real estate records in the county or counties in which the affected parcels of real estate or any portion of them is located;

RCW 58.17.04 Chapter inapplicable when

(6) A division made for the purpose of alteration by adjusting boundary lines, between platted or unplatted lots or both, which does not create any additional lot, tract, parcel, site, or division nor create any lot, tract, parcel, site, or division which contains insufficient area and dimension to meet minimum requirements for width and area for a building site;

RCW 65.04.045 Recorded instruments—Requirements—Content restrictions—Form.

(1) When any instrument is presented to a county auditor or recording officer for recording, the first page of the instrument shall contain:

(a) A top margin of at least three inches and a one-inch margin on the bottom and sides, except that an instrument may be recorded if a minor portion of a notary seal, incidental writing, or minor portion of a signature extends beyond the margins;

(b) The top left-hand side of the page shall contain the name and address to whom the instrument will be returned;

(c) The title or titles, or type or types, of the instrument to be recorded indicating the kind or kinds of documents or transactions contained therein immediately below the three-inch margin at the top of the page. The auditor or recording officer shall be required to index only the title or titles captioned on the document;

(d) Reference numbers of documents assigned or released with reference to the document page number where additional references can be found, if applicable;

(e) The names of the grantor(s) and grantee(s), as defined under RCW [65.04.015](#), with reference to the document page number where additional names are located, if applicable;

(f) An abbreviated legal description of the property, and for purposes of this subsection, "abbreviated legal description of the property" means lot, block, plat, or

section, township, range, and quarter/quarter section, and reference to the document page number where the full legal description is included, if applicable;

(g) The assessor's property tax parcel or account number set forth separately from the legal description or other text.

(2) All pages of the document shall be on sheets of paper of a weight and color capable of producing a legible image that are not larger than fourteen inches long and eight and one-half inches wide with text printed or written in eight point type or larger. All text within the document must be of sufficient color and clarity to ensure that when the text is imaged all text is readable. Further, all pages presented for recording must have at minimum a one-inch margin on the top, bottom, and sides for all pages except page one, except that an instrument may be recorded if a minor portion of a notary seal, incidental writing, or minor portion of a signature extends beyond the margins, be prepared in ink color capable of being imaged, and have all seals legible and capable of being imaged. No attachments, except firmly attached bar code or address labels, may be affixed to the pages.

(3) When any instrument, except those generated by governmental agencies, is presented to a county auditor or recording officer for recording, the document may not contain the following information: (a) A social security number; (b) a date of birth identified with a particular person; or (c) the maiden name of a person's parent so as to be identified with a particular person.

The information provided on the instrument must be in substantially the following form:

This Space Provided for Recorder's Use

When Recorded Return to:

....

Document Title(s)

Grantor(s)

Grantee(s)

Legal Description

Assessor's Property Tax Parcel or Account Number

Reference Numbers of Documents Assigned or Released

RCW 84.56.345 Alteration of property lines—Payment of taxes and assessments.

Every person who offers a document to the auditor of the proper county for recording that results in any division, alteration, or adjustment of real property boundary lines, except as provided for in RCW 58.04.007(1) and 84.40.042(1)(c), must present a certificate of payment from the proper officer who is in charge of the collection of taxes and assessments for the affected property or properties. All taxes and assessments, both current and delinquent must be paid. For purposes of chapter 502, Laws of 2005, liability begins on January 1st.

WAC 332-130-050 Survey map requirements.

The following requirements apply to land boundary survey maps and plans, records of surveys, plats, short plats, boundary line adjustments, and binding site plans required by law to be filed or recorded with the county.

(1) All such documents filed or recorded shall conform to the following:

WAC 458-61A-109 Trading/exchanging property and boundary line adjustments.

(1) **Trading/exchanging property.** The real estate excise tax applies when real property is conveyed in exchange for other real property or any other valuable property. The real estate excise tax is due on the true and fair value for each individual property.

(2) **Boundary line adjustments.**

(a) **Introduction.** A boundary line adjustment is a legal method to make minor changes to existing property lines between two or more contiguous parcels. Real estate excise tax may apply depending upon the specific circumstances of the transaction. Boundary line adjustments include, but are not limited to, the following:

- (i) Moving a property line to follow an existing fence line;
- (ii) Moving a property line around a structure to meet required setbacks;
- (iii) Moving a property line to remedy a boundary line dispute;
- (iv) Moving a property line to adjust property size and/or shape for owner convenience; and
- (v) Selling a small section of property to an adjacent property owner.

(b) **Boundary line adjustments in settlement of dispute.** Boundary line adjustments made solely to settle a boundary line dispute are not subject to real estate excise tax if no other consideration is present.

(c) **Taxable boundary line adjustments.** In all cases, real estate excise tax applies to boundary line adjustments if there is consideration (other than resolution of the dispute), such as in the case of a sale or trade of property.

(3) **Examples.** The following examples identify a number of facts and then state a conclusion. These examples are provided as a general guide. The status of each situation must be determined after a review of all of the facts and circumstances.

(a) Mr. Jehnsen and Mr. Smith own adjoining parcels of land separated by a fence. During a survey to confirm the property boundary of Mr. Smith's parcel, the parties discover that the true property line actually extends five feet over on Mr. Jehnsen's side of the fence. Mr. Jehnsen does not want to move the fence. He has paved, landscaped and maintained this section of land and if he gave it up he would lose his parking area. After numerous discussions regarding the property line, Mr. Smith agrees to quitclaim the five-foot section of land to Mr. Jehnsen. Real estate excise tax does not apply since there is no consideration other than resolution of the dispute.

(b) Mr. Smith will only agree to transfer the five-foot section of land to Mr. Jehnsen if he is paid \$1,000. Mr. Smith owes real estate excise tax on \$1,000.

(c) Mr. Smith will cede the five-foot parcel only if Mr. Jehnsen gives him a narrow strip of land in exchange. Mr. Jehnsen agrees to exchange a ten-foot section of his parcel for the five-foot section of Mr. Smith's parcel solely to resolve the boundary line dispute. Real estate excise tax does not apply. It is irrelevant that the property involved in the transfer is not equal since the sole purpose of the transfer is to settle a boundary line dispute.

(d) Mr. Smith and Mr. Jehnsen are unable to resolve their dispute over the five-foot parcel. Mr. Jehnsen agrees to trade his lake front cabin for Mr. Smith's entire parcel.

Mr. Jehnsen will owe real estate excise tax on the fair market value of the lake front cabin. Mr. Smith owes real estate excise tax on the fair market value of his parcel.

(e) Mr. Smith wants something in exchange for giving the five-foot parcel to Mr. Jehnsen. Mr. Jehnsen agrees to give Mr. Smith his tractor in exchange for the five-foot section of land. Mr. Smith will owe real estate excise tax on the fair market value of the five-foot section of his parcel and use tax on the value of the tractor (see WAC [458-20-178](#)).

(f) Mr. Robbins owns 18 acres of land adjacent to Ms. Pemberton's 22-acre parcel. Mr. Robbins would like to develop his 18 acres, but he needs two more acres to develop the land. Ms. Pemberton agrees to give Mr. Robbins two acres of land. In exchange Mr. Robbins agrees to pave Ms. Pemberton's driveway as part of the land development. The real estate excise tax is due on the true and fair value of the two acres conveyed to Mr. Robbins. In addition, sales or use tax may be due on the value of the paving.

(4) **Documentation.** In all cases, an affidavit is required to record the new property line.

AGO 1986 No. 6 - Mar 21 1986

Attorney General Ken Eikenberry

COUNTIES -- REDIVISION -- SHORT SUBDIVISION -- ADJUSTING BOUNDARY LINES

The dividing of a lot in a previously approved subdivision into two halves with the intent that one-half be sold and attached to an adjoining parcel outside the subdivision does not create a boundary line adjustment.

March 21, 1986

Honorable David F. Thiele
Island County Prosecuting Attorney
P.O. Box 430
Coupeville, Washington 98239

Cite as: AGO 1986 No. 6

Dear Sir:

By letter previously acknowledged, you have requested the opinion of this office on two questions which we have paraphrased as follows:

(1) If a lot in a previously approved subdivision is divided in half, with the intent that one-half be sold and attached to another adjoining parcel outside the subdivision (which will then become part of the existing subdivision) (lot 1A) and with the other one-half remaining (lot 1B) containing sufficient area to meet minimum requirements for width and area for a building site, is this a boundary line adjustment under RCW 58.17.040 and therefore not subject to the provisions of chapter 58.17 RCW?

(2) If the same lot were divided in half with the intent that one-half be removed from the subdivision, sold, and attached to another adjoining parcel outside the subdivision with the other one-half remaining in the subdivision containing sufficient area to meet minimum requirements for width and area for a building site, is this a boundary line adjustment under RCW 58.17.040 and therefore not subject to the provisions of chapter 58.17 RCW?

We answer both your questions in the negative for the reasons set forth in our analysis.

ANALYSIS

Turning to your first question, initially, it is important to note the purpose of chapter 58.17 RCW. RCW 58.17.010 provides as follows:

"The legislature finds that the process by which land is divided is a matter of state concern and should be administered in a uniform manner by cities, towns, and counties, throughout the state. The purpose of this chapter is to regulate the subdivision of land and to promote the public health, safety and general welfare in accordance with standards established by the state to prevent the overcrowding of land; to lessen congestion in the streets and highways; to promote effective use of land; to promote safe and convenient travel by the public on streets and highways; to provide for adequate light and air; to facilitate adequate provision for water, sewerage, parks and recreation areas, sites for schools and schoolgrounds and other public requirements; to provide for proper ingress and egress; to provide for the expeditious review and approval of proposed subdivisions which conform to zoning standards and local plans and policies; to adequately provide for the housing and commercial needs of the citizens of the state; and to require uniform monumenting of land subdivisions and conveyancing by accurate legal description." (Emphasis supplied)

Additionally, RCW 58.17.020 defines a short subdivision as ". . . the division or redivision of land into four or fewer lots, tracts, parcels, sites or divisions for the purpose of sale, lease, or transfer of ownership. . . ."1/

Redivision is an additional separation into parts. As the facts you posed indicate, a lot, in a previously approved subdivision, is divided in half. It is our opinion that this action constitutes a redivision. Inasmuch as four or fewer lots are created, this would be a short subdivision rather than a subdivision (RCW 58.17.020--five or more lots). If this is a short subdivision it is subject to the provisions of chapter 58.17 RCW. RCW 58.17.060 requires cities, towns and counties to adopt regulations and procedures for the approval of short subdivisions. Therefore, the action you described would be subject to approval under your local regulations unless it falls under the exception enumerated in RCW 58.17.040(6).2/

RCW 58.17.040 lists a number of exceptions to the application of chapter 58.17 RCW. Your question specifically relates to RCW 58.17.040(6) which states as follows:

"A division made for the purpose of adjusting boundary lines which does not create any additional lot, tract, parcel, site, or division nor create any lot, tract, parcel, site, or division which contains insufficient area and dimension to meet minimum requirements for width and area for a building site; . . ."

The facts presented in your question indicate that a lot within an existing subdivision will be divided in half with both halves remaining within the existing subdivision. Clearly, in this situation, an additional lot is created. (Where the subdivision originally had a lot 1, it will now have a lot 1A and a lot 1B.) This creation of an additional lot removes this action from the exemption provided in RCW 58.17.040(6). Accordingly, it is our conclusion that the action described in question (1) is a redivision

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subject to the provisions of chapter RCW 58.17 [chapter 58.17 RCW] and we therefore answer your first question in the negative.

Regarding your second question, the facts are similar except that the lot in question is to be removed from the existing subdivision and attached to an adjoining parcel outside the subdivision. Unlike your first question, in this situation no additional lot is created. We therefore turn to a further analysis of RCW 58.17.040(6).

The essence of your question is whether the division of a lot with each parcel containing sufficient area and dimension to meet minimum requirements for width and area for a building site constitutes a boundary line adjustment making it exempt from coverage under chapter 58.17 RCW. Unfortunately, when the legislature enacted chapter 293 in 1981³/ it did not provide a definition of "adjusting boundary lines." The statute does not itself further describe what a boundary line adjustment is nor is there any legislative history available which clarifies the meaning of "adjusting boundary lines." Further, this issue has never been addressed by any appellate court in this state. Thus, it is necessary for us to glean the legislature's intent from what it did say.

Black's Law Dictionary defines "adjustment" as an arrangement or settlement (citing Henry D. Davis Lumber Co. v. Pacific Lumber Agency, 127 Wash. 198, 220 Pac. 804, 805 (1923)). "Adjust" is defined as "[t]o settle or arrange; to free from differences or discrepancies; . . ." (Black's Law Dictionary). Webster's Third New International Dictionary defines "adjust" as ". . . settle, resolve . . . rectify . . ." and, "adjustment" as "the bringing into proper, exact, or conforming position or condition . . . harmonizing or settling (the adjustment of variant views) . . ."

Words in statutes must be given their ordinary meaning where no statutory definition is provided. State v. Roadhs, 71 Wn.2d 705, 708, 430 P.2d 586 (1967). Pringle v. State, 77 Wn.2d 569, 571, 464 P.2d 425 (1970). Thus, "adjusting" means settling or arranging; freeing from differences or discrepancies; rectifying. Adjusting may be necessary where some controversy exists regarding the boundary line or where arranging or rectifying is required.

The legislature recognized that boundary line disputes do occur when it enacted RCW 58.04.020 which reads as follows:

"Whenever the boundaries of lands between to [two] or more adjoining proprietors shall have been lost, or by time, accident or any other cause, shall have become obscure, or uncertain,and the adjoining proprietors cannot agree to establish the same, one or more of said adjoining proprietors may bring his civil action in equity, in the superior court, for the county in which such lands, or [[Orig. Op. Page 5]] part of them are situated, and such superior court, as a court of equity, may upon such complaint, order such lost or uncertain boundaries to be erected and established and properly marked." (Emphasis supplied)

If the parties can agree on the location of the boundary line, pursuant to RCW 58.17.040(6), then they would not be required to resort to civil action under RCW 58.04.020 to obtain a determination of the proper location of the boundary line.

An adjustment may be necessary where, for example, a boundary in an approved plat may need to be changed by a developer for proper installation of utilities to two lots. Assuming no additional lot was created and no lot was left containing insufficient area to constitute a building site, such a change in boundary line would be a rectifying or arranging pursuant to the usual and ordinary meaning of the term "adjusting." Therefore, this division would be an adjusting of boundary lines under RCW 58.17.040(6).

"In placing a judicial construction upon a legislative enactment, the entire sequence of all statutes relating to the same subject matter should be considered. . . ." Brewster Public Schools v. PUD No. 1, 82 Wn.2d 839, 843, 514 P.2d 913 (1973) citing Amburn v. Daly, 81 Wn.2d 241, 245-46, 501 P.2d 178 (1972). Legislative intent, will, or purpose, is to be ascertained from the statutory test as a whole, interpreted in terms of the general object and purpose of the act. Brewster, 82 Wn.2d at 843. As previously cited, the purpose of chapter 58.17 RCW is to assure uniformity in the process by which land is divided and to regulate the subdivision of land.

In the facts presented, the parties intend to establish a boundary line (cutting a lot in half) where none existed before. Although there is no additional lot, tract, parcel, site or division, a new plat boundary line is created. We do not believe this is in keeping with the purpose of the statute nor with our interpretation of "adjusting boundary lines."4/

It should also be noted that the definition of "short subdivision" speaks of redivision of land for the purpose of sale. Here, the lot in question is being divided so that one-half may be purchased by an adjoining landowner. For the reasons discussed herein it is our opinion that the anticipated property alteration is the creation of a short subdivision under RCW 58.17.020(6) and not an adjusting of boundary lines under RCW 58.17.040(6). Accordingly, we answer your second question in the negative.5/ We trust that the foregoing will be of some assistance to you.

Very truly yours,
KENNETH O. EIKENBERRY
Attorney General

MEREDITH WRIGHT MORTON
Assistant Attorney General

*** FOOTNOTES ***

1/AGO 1980 No. 5 dealt with the provisions of chapter 58.17 RCW. In 1980 a "short subdivision" was defined as ". . . the division of land into four or less lots, tracts, parcels, sites or subdivisions for the

purpose of sale or lease." AGO 1980 No. 5 discussed an earlier recommendation to the State Legislature that the word "resubdivision" be expressly defined. In 1981 the legislature amended chapter 58.17 RCW adding the word "redivision" to the definition of "short subdivision." "Resubdivision" was stricken from the definition of "subdivision" and substituted for "redivision."

2/There are also six other exceptions enumerated under RCW 58.17.040, however, clearly, none of them are applicable to your fact situation. So we will not provide an analysis of them.

3/Codified in part as RCW 58.17.040(6).

4/There may be counties which have adopted ordinances which would exempt this factual situation from county approval. Inasmuch as you have asked for our opinion regarding this situation, we assume no such ordinance exists in Island County.

5/In so concluding we recognize that, as we did in AGO 1980 No. 5, there is a lack of uniformity among the various local jurisdictions in actual practice throughout the state. The state legislature remains free to clarify its own intent, if we have not sufficiently done so, by expressly defining the phrase "adjusting boundary lines."

AGO 2005 No. 2 - Mar 7 2005

Attorney General Rob McKenna

PROPERTY – REAL ESTATE – COUNTIES – Authority of county to impose procedural requirements on recording of property boundary disputes resolved by agreement.

1. RCW 58.04.007 permits property owners to resolve uncertain or disputed property boundaries when the boundary line cannot be ascertained through a reference to public records or physical landmarks, or where there is an actual dispute between landowners about the location of the boundary line.

2. A charter county has authority to implement and facilitate the operation of RCW 58.04.007 by prescribing procedures to be followed in recording written agreements concerning the resolution of unknown or disputed boundary lines, including requirements for county review of documents presented for recording where the county provisions are not in conflict with statutory law.

March 7, 2005

The Honorable Bill Finkbeiner
State Senator, 45th District
P. O. Box 40445
Olympia, WA 98504-0445

Cite As:

AGO 2005 No. 2

Dear Senator Finkbeiner:

By letter previously acknowledged, you have asked for an opinion on the following questions, which we have slightly paraphrased for clarity:

- 1. May RCW 58.04.007 be used to resolve any type of boundary dispute, or is the statute only meant to resolve a certain type of boundary dispute?**
- 2. RCW 58.04.007 permits property owners to resolve a dispute about property boundary lines by a written document showing their agreement about the location of the boundary line, recorded as a real estate record. Does a charter county have authority to require county review before the written instrument can be recorded?**

BRIEF ANSWERS

RCW 58.04.007 is available to resolve disputes about property boundary lines where (1) the boundary line cannot be ascertained through a review of public records, monuments, or landmarks, or (2) there is an actual dispute between the property owners as to the location of the boundary line. A charter county has authority to facilitate the administration of RCW 58.04.007 (*original page 2*) and related statutes by imposing reasonable procedural requirements relating to the recording of written instruments establishing property boundaries.

ANALYSIS

Your questions relate to interpretation of RCW 58.04.007, a statute setting forth optional procedures for resolving questions about the boundary lines separating adjoining parcels of land. This section provides:

Whenever a point or line determining the boundary between two or more parcels of real property cannot be identified from the existing public record, monuments, and landmarks, or is in dispute, the landowners affected by the determination of the point or line may resolve any dispute and fix the boundary point or line by one of the following procedures[.]

The statute then describes two procedures for resolving boundary disputes: (1) a written agreement signed by the affected property owners documenting the location of the point or line separating the parcels, signed and acknowledged in the manner required for a conveyance of real property and recorded with the real estate records of the county where the property is located; or (2) a court action to determine the boundary, filed under RCW 58.04.020. RCW 58.04.007 (1), (2). Your questions concern the circumstances under which the first of the two alternatives may be used.

1. May RCW 58.04.007 be used to resolve any type of boundary dispute, or is the statute only meant to resolve a certain type of boundary dispute?

It does not appear that the appellate courts have construed RCW 58.04.007, and our examination of the legislative history of its enactment (Laws of 1996, ch. 160, § 3) did not provide insight beyond what can be gleaned from examining the text of the statute.

Where statutory language is unambiguous, the courts derive legislative intent from the text of the statute alone, construing it as a whole and giving effect to every provision. *Schromv. Bd for Volunteer Fire Fighters*, 153 Wn.2d 19, 100 P.3d 814 (2004) (construing statutes defining eligibility of fire district employees for pension benefits). The text of RCW 58.04.007 provides a clear indication of the circumstances where this statute was intended to apply. First, the statute may be used when a “point or line” determining the boundary between two or more parcels of property cannot be identified based on existing records, monuments, and landmarks. Thus, the statute would not apply (for instance), where the boundaries of a parcel are established but the ownership of the parcel is in doubt.

Second, the statute applies when a point or line determining the boundary between two parcels is in dispute. The statute presupposes, then, an actual controversy between adjoining property owners as to the boundary line between their parcels. This point is underscored by the fact that before the enactment of RCW 58.04.007, litigation was the only way to resolve property line disputes.

(original page 3) In asking whether RCW 58.04.007 may be used to resolve any type of boundary dispute or is meant to resolve only certain kinds of disputes, your letter does not posit particular types of disputes that you may have in mind, and we can think of none other than those addressed by the statute, as discussed above. It seems apparent from the statutory language, however, that RCW 58.04.007 is limited to circumstances where a boundary line or point between parcels is objectively uncertain or where there is an actual dispute over the point or line that determines the boundary. The statute does not speak more broadly to address other circumstances that may give rise to changes in boundaries, such as subdivision of parcels, or other matters dealt with by different laws.

To illustrate these general principles, the following hypothetical cases might be considered:

Case 1: A and B are the owners of adjoining tracts of land. The deeds establishing the line between their property (recorded in territorial days) refer to certain monuments (an old cedar tree, a certain rock) that either no longer exist or cannot be identified.

Case 2: C and D own adjoining lots in a subdivision. C contends that a survey monument placed many years ago accurately marks the boundary between the lots. D contends that the monument has been moved and that a fence built by a previous owner is on the true boundary.

Case 3: E and F, sisters, have jointly inherited a parcel of land from their parents. Rather than continuing in joint ownership of the whole parcel, they hire a surveyor to divide the parcel into two equal portions.

Case 4: G is the owner of a 10-acre parcel of land. G proposes to divide the parcel into 10 one-acre lots and to convey six of these lots to H for a residential development. G and H, by walking the land and using a map of the property, reach agreement concerning the boundaries separating the lots.

It would appear that RCW 58.04.007 was designed for the situations illustrated in Case 1 and Case 2 above. In Case 1, the recorded property description cannot be understood without reference to the landmarks, and the landmarks can no longer be identified. A and B cannot determine where the line separating their property is located. Perhaps, with the help of a surveyor or with research concerning old records, they will be able to establish a line they can agree on without going to court. Similarly, C and D might find that a new survey will establish whether the survey monument or the fence is on the line between their lots, and they could record the results of the survey instead of resorting to litigation.

By contrast, RCW 58.04.007 does not cover Case 3 or Case 4 above. In Case 3, there is no uncertain boundary between adjoining parcels, nor is a boundary line in “dispute” between two landowners. Rather, the question is where to draw a new boundary line dividing a single (*original page 4*) existing parcel. Likewise, in Case 4, there is no “dispute” between existing landowners but rather an agreement concerning the subdivision of an existing parcel. Furthermore, in Case 4 at least, a subdivision into several lots implicates the platting and subdivision laws.

The hypothetical cases cited above are not intended to address any actual situations. They merely illustrate our view of the scope of RCW 58.04.007.

2. RCW 58.04.007 permits property owners to resolve a dispute about property boundary lines by written document showing their agreement about the location of the boundary line, recorded as a real estate record. Does a charter county have authority to require county review before the written instrument can be recorded?

Your opinion request states that King County requires review of boundary line agreements before they are recorded under RCW 58.04.007, and your second question asks whether a county may enact such a requirement.

The function of an Attorney General Opinion is to provide legal analysis of questions relating to statutory interpretation but is not to provide legal comment on specific existing disputes. Accordingly, we will address the general matter of the authority of charter counties to adopt local laws on this subject, but we do not intend our analysis as a comment on any particular dispute.^[1]

A charter county has broad legislative authority, except that its action may not contravene any constitutional provision or legislative enactment. Const. art.XI, § 4. *King Cy. Coun. v. Disclosure Comm'n*, 93 Wn.2d 559, 611 P.2d 1227 (1980). We could discover no constitutional provision limiting the authority of counties to legislate concerning recording boundary line agreements, so the question becomes: Is such an ordinance precluded by state statute? Since the state statute here is RCW 58.04.007 itself, the question becomes: Does this statute preempt county legislation on the subject?

County legislation is preempted if it directly contravenes some provision of RCW 58.04.007 or some other statute. As one of the cases explains it, a local regulation conflicts with a statute when it permits what is forbidden by state law or prohibits what state law permits. *Parkland Light & Water Co. v. Tacoma-Pierce Cy. Bd. Of Health*, 151 Wn.2d 420, 70 P.3d 37, (2004). Thus, for instance, a county ordinance requiring that all boundary line disputes be resolved by the courts (and prohibiting the county real estate recording office from recording written agreements under any circumstances) would contravene the language of RCW 58.04.007 and would therefore be void. Courts are reluctant to interpret a state statute to preclude local legislation unless that is clearly the legislative intent. *Wed. v. San Juan Cy.*, 135 Wn.2d 678, 958 P.2d 273 (1998).^[2]

(original page 5) In our view, RCW 58.04.007 leaves room for local legislation, particularly legislation designed to implement the statute and facilitate its administration. Since RCW 58.04.007 specifies only that the agreement be in written form, for instance, a charter county could enact

requirements concerning the form of the written agreement (size of the document, what information it should contain, and where on the document each item should be located, etc.). Insofar as an ordinance providing for pre-recording county review may be concerned, we simply note that counties would appear to have considerable leeway in this area so long as the local legislation does not contravene the statute itself. For instance, an ordinance providing for review to determine whether a document presented for recording meets the requirements set forth in the statute (see discussion above) (or whether accepting a document for recording would be in conflict with some other state statute or state or local regulatory requirement^[3]) would not necessarily be inconsistent with the statute. At least where a county can show that its ordinance serves a legitimate purpose and does not frustrate or negate the application of RCW 58.04.007 or other statutes, we believe the ordinance would be upheld.

We trust the foregoing will be of assistance to you.

Sincerely,

JAMES K. PHARRIS

Senior Assistant Attorney General

:pmd

^[1] Because King County is a charter county, we will analyze the law relating to charter counties and do not reach the question whether a noncharter county would have authority to adopt an ordinance of this type.

^[2] We also conclude that the State, by enacting RCW 58.04.007, did not intend to “occupy the field” of legislation on boundary disputes, thus precluding local legislation on the subject. Compare this case with *Cherry v. Mun. of Metro. Seattle*, 116 Wn.2d 794, 808 P.2d 746 (1991), where the court noted that the state had expressly preempted the field of regulation of firearms possession (RCW 9.41.290) but still found that an employer could prohibit employees from carrying firearms on the job. See also *City of Tacoma v. Naubert*, 5 Wash. App. 856, 491 P.2d 652 (1971), holding that a state statute regulating sale of erotic material to minors preempted local regulations on the same subject. Local procedural regulations on boundary disputes are neither expressly preempted, as is the case with firearms, nor inherently inconsistent with the state statutes on the subject.

[3] For instance, suppose G and H, the property owners in hypothetical Case 4 above, presented for filing a written agreement resolving their “dispute” concerning boundaries of the lots created to further their development plans. Such a document (1) would be beyond the scope of RCW 58.04.007 itself, (2) would also violate the platting and subdivision laws, and (3) might be inconsistent with local zoning or state growth management laws. Allowing such a document to be recorded could lead to confusion, at the very least, as to the status of the property in question. Thus, a county might require review to head off such potential problems.

From: [Beverly Parsons](#)
To: [Amanda Walston](#)
Subject: Comment for Planning Commission Hearing on Comp Plan Draft
Date: Tuesday, September 24, 2024 1:55:08 PM
Attachments: [9-24PCHearing.CompPlanComment.bparsons.9-24-24.docx](#)

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Hi Amanda,

I'm submitting the attached comment for the Planning Commission's public hearing this evening. I'll make a verbal comment as well but since the attached is longer than the time limit, I'm submitting it in writing.

Thanks and see you tonight!

B

Beverly A. Parsons
PO Box 269
Hansville, WA 98340
661-343-5052 (cell)
bevandpar@aol.com
bevandpar@gmail.com

Comments for Planning Commission on Comp Plan Update Public Hearing 9-24-24

I'm Beverly Parsons from Hansville.

Thank you for this opportunity to provide input about the Final Draft of the Comp Plan Update and related documents. I submitted a comment to you on September 17th during your deliberations of the draft plan that spoke of the need to focus on the County's new vision as given in the draft plan.

I would like to take my earlier comment a step further and request that you add two brief sections to the Introduction that are related to the future use of the Comp Plan. Plans such as this one too easily end up on a shelf and not used in important decision-making. One suggested new section is *Use of Revised Mission and Vision*. It would likely follow the section, *Preferred Alternative* (p.16). The second suggested new section is *Continued Public Participation*. It would follow the section, *The Planning Process and Public Participation* (p. 17)

1. New Section: *Use of Revised Mission and Vision*

Based on past experience working with planning processes, I want to call attention to the fact that the change in mission and vision is a profound change. The significance of the change may not be recognized by those who are to use this Comp Plan in the future. Here is a suggested wording of this proposed new section.

Use of Revised Mission and Vision

It is the responsibility of all Kitsap County government officials, staff, and advisors to make decisions based on the Comprehensive Plan's revised Kitsap County Mission and Vision. The revised mission now includes responsiveness as a key responsibility of Kitsap County Government. The vision is of the county becoming a community—an engaged, connected, safe, healthy and livable, resilient, vibrant, and well-governed community—as a result of enacting the Comprehensive Plan. Thus, when County government officials, staff, and advisors make decisions, the focus is not on simply balancing the interests of one group or element with another. Rather, it is on focusing all parties on the County becoming a true community that is an engaged, connected, safe, healthy and livable, resilient, vibrant, and well-governed community. Subareas within the County would mirror this same type of community. The approach involves systems thinking—seeing the whole—rather than a focus on separate elements.

2. New Section: *Continued Public Participation*

Again, based on past planning experience, I have found that often active public participation is forgotten when it comes to implementation. It is essential to continue public participation throughout implementation. That participation needs to focus on the type of community that the County wants to become—an engaged, connected, safe, healthy and livable, resilient, vibrant, and well-governed community. Such participation processes need to bring the full range of voices together representing the diversity of the County to jointly determine how to build the desired community. It is not limited to sequential meetings with different interest

groups. It involves sitting down together to create the desired community recognizing and respecting the full diversity of perspectives that create the desired type of community. Different engagement processes are needed from those used in the development of the plan. A suggested paragraph to add to the Introduction is:

Continued Public Participation

To help the County become an engaged, connected, safe, healthy and livable, resilient, vibrant, and well-governed community as stated in the County Vision, continued vision-focused public participation is needed during implementation of the Comprehensive Plan. County government officials, staff, and advisors are expected to gain and use the skills and knowledge necessary to implement the Comprehensive Plan in a way that holistically supports the vision. They bring widely representative groups in the community together to seek to understand and strategize for the big picture. It's not a few groups here and there pushing their own agenda. An example would be a focus on affordable, livable communities in an area of the county rather than focusing narrowly on affordable housing and environmental protection. It would involve respectful facilitation of diverse residents who work together to create the desired type of community.

Thank you for considering these suggestions.

From: [Martha Burke](#)
To: [Amanda Walston](#)
Subject: Comment on Hearing on Comprehensive Plan Preliminary Alternative
Date: Tuesday, September 24, 2024 12:08:11 PM

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Dear Commissioners:

My name is Martha Burke and I live in Suquamish. I have the following comment regarding the Hearing this evening on the Comprehensive Plan Preliminary Alternatives.

I want to complement the County on their direction towards building communities where people can live and work within their neighborhood, with access to schools, stores, cultural centers and nature without the need to drive everywhere. This doesn't currently exist most places and it will take active work on the part of County staff and programs to create it. This is especially true if we want to create diverse communities that include affordable housing. The Silverdale Regional Center Subarea Plan is laudable in that it is fairly specific and lays out some incentives and requirements to be included. However, I think the County is going to need to take the lead in making the kind of development happen, not just rely on what is essentially a passive approach of waiting for "opportunities". Some of our larger sister cities have had more experience with this. In Seattle, the Seattle Housing Authority has worked to redevelop areas such as High Point to provide a thriving community for nearly 1,600 families. Its community amenities, services and parks are a magnet for both locals and visitors from the greater neighborhood, and it is renowned for its environmentally responsible design and healthy living initiatives. This kind of project will require the involvement of responsible developers interested in good design, the support of nonprofits as well as state and federal funds, but also the active direction of the County. Without that participation the County might yes, be able to meet its goal for more dense, lower cost housing, but it will have sacrificed that goal of developing a community, not just a place to live.

From: [Gary Chapman](#)
To: [Amanda Walston](#); [Eric Baker](#); [Colin Poff](#); [Comp Plan](#)
Subject: Comments Regarding the 2024 Comprehensive Plan Update
Date: Tuesday, September 24, 2024 11:49:06 AM
Importance: High

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To the Planning Commission of Kitsap County,

As a licensed professional Land Surveyor we are imploring you to strike the draft change to the definition of a boundary line adjustment from the comprehensive plan. This draft was thrown into the latest rendition without the opportunity for peer review or public comment. The draft is extremely poorly written and fraught with misuse and misinterpretation of terminology and principles of property boundaries which will only cause complete shutdown of any person's ability to change a property line for a large number of legitimate reasons. This language was clearly written by someone who has no knowledge of how to determine property boundaries, property ownership and no knowledge of the difference between fee title and easements or right of ways. The State of Washington only recognizes our court systems and land surveyors licensed by the state to make boundary determinations. The language in this definition fails to understand the basic 101 principles of property boundaries and clearly has not been written by either. I am imploring you to strike this from the changes to the compressive plan until this can be fully vetted by professionals who are licensed to make boundary determinations.

Clearly the author of this definition is trying to prevent small strips of land, typically tax title, from creating larger building lots. Decades ago this was a common practice, however this was stopped long ago and was codified in Title 16.62, Legal Lot Determination. In fact most of the items listed in this change have already been codified under title 16.62 and there is no need to amend the current definition.

The author further thinks it's possible to do the same with right of ways, vacated right of ways and easements. This is where the author shows they have zero understanding of the basic principles of land boundaries, ownershfee title and permissive use. The author fails to understand these items are not property boundaries, they are permissive use over another person's land. The land within these is still owned by the adjoining property owners. Changing an easement does not change a boundary. Changing a boundary does not change an easement. There is no possible way to take any of these items to create new lots. Yet, there are hundreds of real life scenarios where people want to BLA legally created land involving these. Here are some examples.

Two neighbors agree to vacate an old county right of way between them but one land owner needs

all of the right of way area. Kitsap County vacates the right of way and they both get the clear title of the land to the centerline. Afterwards they need to do a BLA to move the property line so one neighbor gets all of the right of way. This definition would prevent this.

Similar to a tax title strip, two adjoining property owners, both legal lots, go together to buy a tax title strip. Afterwards they want to add the land to their lots, this prevents this from happening.

The same goes on and on for land such as open space. We prepared a boundary line adjustment to private open space and the adjoining lot owners because they had cleared and encroached into the open space. They set aside other land which was undisturbed to compensate for the change. This definition would prevent this. These definitions flat out tells people no to any BLA with no solution to amending these for the public good.

Adding this language at the very last minute is completely shady and is an attempt at DCD to subvert the opportunity for public comment and review by those who are authorized by the state to make these decisions. This is clearly an money grab situation for DCD to require a permit review process to further fund their budget. It's completely outrageous for DCD to even think they are qualified to make these determinations when they do not have a licenses surveyor on staff. If they did a surveyor that person would have corrected falsehoods which the code is clearly based.

DCD does not have licensed professional to review these and most of the staff are fairly junior in their careers and do not have the knowledge or experience to make determinations of property boundaries. A BLA permit is breaking state law by granting authority of unlicensed persons to make boundary determinations.

The permit process is going to add many months and likely years for the approval process. It currently takes several years to go through the simplest subdivisions. A BLA permit will require the same review and add to the burdens of an already overwhelmed staff. Most boundary line adjustments are made during real estate transactions which time is critical. This will destroy any ability to close real estate transactions in any reasonable timeline.

The permit process will severely increase the cost of any BLA between DCD permit fees and adding other professional consultants to provide data. We are in the middle of an affordable housing crises and this will only add to the problem.

Gary Chapman, PLS

AES Consultants, Inc.

Professional Land Surveyors

P.O. Box 930

3472 NW Lowell St

Silverdale, WA 98383

360-692-6400

Squaxin Island Tribe Attachment to Public Comment Dated 9/25/24.

Relating to Land Use Policy 4.2 on Page 35:

Landowners always think critical areas restrictions are arbitrary and capricious.

Relating to Land Use Strategy 4.b. on Page 36:

Suggested edit: ...community rights, tribal treaty rights, that are affected as well as private property rights.

Relating to Land Use Goal 6 on Page 36:

Proposed Policy. Understand the impacts of land use decisions on different communities, including tribal communities, in Kitsap County.

Relating to Land Use Goal 8 on Page 37:

Proposed Policy. Promote land use and environmental policies that sustain local fish and shellfish production, which is a benefit to tribal people and all people in the county

Relating to Land Use Policy 18.5 on Page 70:

Similar comment as one below. If the county is going to acknowledge water as an agricultural necessity, the county should balance this statement with an understanding that irrigation requires water rights and that surface water diversion is not compatible with supporting treaty-reserved fish populations in streams and lakes and wetlands.

Relating to Land Use Strategy 18.a on Page 71:

Use of water resources requires water rights as administered by the state. There is not room for traditional agricultural water projects that impound water, block fish, warm water, and deplete water from fish streams. Access to water for agriculture must be done in ways that sustain surface water bodies for fish. Instream flows and treaty rights protect the flow and fish in those streams.

Relating to Land Use Strategy 19.c on Page 74:

Great!

Relating to Economic Development Goal 5 on Page 85:

Ability to access healthy and abundant shellfish and finfish are determinants of health and economic vitality of tribal people who live in Kitsap County.

Relating to Intro of Environment Element on Page 91:

Suggested Edit: The well-being of tribes is intrinsically linked to a healthy natural environment.

Relating to Intro of Environment Element on Page 94:

Excellent

Relating to Intro of Environment Element on Page 94:

Suggested edit: Include acknowledgment of Streamflow Restoration Act.

Relating to Intro of Environment Element on Page 94:

Include bullet on watershed restoration planning.

Relating to Environment Goals/Policies/Strategies on Page 97:

Somewhere in this section, explicitly refer to the soon to be adopted draft WRIA 15 Watershed Restoration and Enhancement Plan, the number of permit-wells expected in the county, and the county's commitment to finding and implementing streamflow restoration projects. There are many places where it could fit.

Relating to Environment Strategy 1.f on Page 98:

Great

Relating to Environment Strategy 2.d on Page 100:

Perhaps remove reference to water availability, as that is a little confusing.

Relating to Environment Policy 3.1. on Page 100:

Suggested edit: tribal health,

EXPANDED HOUSING CHECKLIST

Periodic Update Checklist for Fully-Planning Cities and Counties¹ with additional checklist items for housing element review.²

This checklist provides the framework Commerce regional planners will use to review periodic update submissions. **This checklist is NOT required to be completed by each jurisdiction;** it is an additional tool to help local planners meet the intent of the statute.

- Jurisdictions may submit draft housing elements to [Laura Hodgson](#) for initial review prior to 60-day review. Jurisdictions in the PSRC region are encouraged to submit draft housing elements to Commerce when it is submitted to PSRC and/or King County, as the requirements from the state are slightly different from the local or regional requirements.
- **Housing element submissions should include a land capacity analysis (LCA) reflecting updated policies.** This LCA may be included as a supporting document such as a Housing Needs Assessment (HNA) or simply a separate land capacity analysis document. If the LCA is missing from the submission, it will be requested by Commerce staff.
- Regional planners will review draft comprehensive plans and development regulations for the items **IN BOLD CAPITALIZED TEXT BELOW EACH ITEM**. If these materials are not included in the housing submission, Commerce staff will request them. More information on these requirements are included in parenthesis if additional information is needed. (Land use element review items are included for reference to ensure consistency between elements.)
- Commerce will also be tracking that zoning changes are consistent with comprehensive plan changes and the LCA ([RCW 36.70A.115](#)). These zoning changes implement the policies in the comprehensive plan to plan for and accommodate housing affordable to all income brackets.
- **Questions?** Contact Laura Hodgson at Laura.Hodgson@commerce.wa.gov or 360-764-3143.

¹ The checklist items in this document are applicable to cities and counties, unless otherwise noted, but the headings in the checklist may be slightly different from the county checklist.

² The May 2024 checklist includes the following updates: (1) Under Section I: Comprehensive Plan Elements, Housing Element, item (e) – clarified that a land capacity analysis is needed for emergency housing. (2) Under Section II: Development Regulations, item (b) – corrected state statute reference which was incorrect.

Section I: Comprehensive Plan Elements

Land Use Element

Consistent with countywide planning policies (CWPPs) and RCW 36.70A.070(1)

	Consistent? Yes/No	Changes needed?
<p>b. A future land use map showing land uses, city limits and UGA boundaries. RCW 36.70A.070(1) and RCW 36.70A.110(6), WAC 365-196-400(2)(d), WAC 365-196-405(2)(i)(ii)</p> <p>THE LAND USES MUST REFLECT PROJECTED GROWTH INCLUDING FUTURE HOUSING NEEDS.</p>	Yes	
<p>d. A consistent population projection throughout the plan which should be consistent with the jurisdiction's allocation of projected countywide population and housing needs. RCW 36.70A.115, RCW 43.62.035 and WAC 365-196-405(f)</p> <p>TABLE OR OTHER DOCUMENTATION OF LOCAL ALLOCATION OF POPULATION AND HOUSING NEEDS BY INCOME BRACKET FROM THE COUNTYWIDE PROCESS.</p>	Yes	
<p>e. Estimates of population densities and building intensities based on future land uses and housing needs. RCW 36.70A.070(1), WAC 365-196-405(2)(i)</p> <p>ESTIMATES SHOULD INCLUDE ASSUMED DENSITIES TO ACCOMMODATE HOUSING NEEDS. (See WAC 365-196-210(6), and Housing Element Book 2: Step C and footnote 30 on page 24.)</p>	Yes	

Housing Element

In the 2021 legislative session, HB 1220 substantially amended the housing-related provisions of the Growth Management Act (GMA), RCW 36.70A.070(2). Local governments should review local comprehensive plan policies and countywide planning policies to be consistent with the updated requirements. Please refer to Commerce's housing webpages for further information about the new requirements:

Updating GMA Housing Elements and Planning for Housing.

	Consistent? Yes/No	Changes needed?
<p>a. Goals, policies and objectives for:</p> <ul style="list-style-type: none"> the preservation, improvement and development of housing, RCW 36.70A.070(2)(b), and moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes, within an urban growth area boundary. RCW 36.70A.070(2)(b) amended in 2021, and WAC 365-196-410(2)(a) <p>ENSURE THERE ARE POLICY(IES) ON A VARIETY OF MODERATE DENSITY HOUSING TYPES, SUCH AS DUPLEXES, TRIPLEXES, AND TOWNHOMES IN URBAN GROWTH AREAS.</p>	Yes	
<p>b. Consideration of housing locations in relation to employment locations. RCW 36.70A.070(2)(d) amended in 2021</p> <p>LAND USE MAP SHOULD SHOW HIGHER DENSITY HOUSING LOCATED NEAR EMPLOYMENT (COMMERCIAL) AND/OR ADJACENT TO HIGH QUALITY TRANSIT IF APPLICABLE. (Housing Element Book 2: see pages 67-68.)</p>	Yes	
<p>c. Consideration of the role of accessory dwelling units (ADUs) in meeting housing needs. RCW 36.70A.070(2)(d) amended in 2021</p> <p>TO SHOW CONSIDERATION OF ADUS, DO ONE OR BOTH OF THE FOLLOWING:</p> <p>(1) THE HOUSING NEEDS ASSESSMENT OR HOUSING ELEMENT MUST INCLUDE TEXT AND/OR POLICIES THAT ADDRESSES THE POTENTIAL FOR ADUS TO MEET HOUSING NEEDS, OR</p> <p>(2) INCLUDE ADU CAPACITY IN LAND CAPACITY ANALYSIS. 20-year ADU capacity should not exceed 10% of eligible lots.</p> <p>(See Housing Element Book 2 - ADU narrative guidance: pages 68-69; ADU capacity: see Step 1.6 on pages 27-28.)</p>	Yes	

Housing Element

In the 2021 legislative session, HB 1220 substantially amended the housing-related provisions of the Growth Management Act (GMA), RCW 36.70A.070(2). Local governments should review local comprehensive plan policies and countywide planning policies to be consistent with the updated requirements. Please refer to Commerce's housing webpages for further information about the new requirements:

Updating GMA Housing Elements and Planning for Housing.

	Consistent? Yes/No	Changes needed?
<p>d. An inventory and analysis of existing and projected housing needs over the planning period, by income band, consistent with the jurisdiction's share of countywide housing need, as provided by Commerce. RCW 36.70A.070(2)(a) amended in 2021, WAC 365-196-410(2)(b) and (c)</p> <p>TABLE OR OTHER DOCUMENTATION OF LOCAL ALLOCATION OF HOUSING NEEDS BY INCOME BRACKET. (Housing Element Book 1: see #6 of "Minimum standards for identifying and allocating projected housing needs" on page 60.)</p>	Yes	
<p>e. Identification of capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing. RCW 36.70A.070(2)(c) amended in 2021, WAC 365-196-410(e) and (f)</p> <p>STATEMENT SHOWING THERE IS SUFFICIENT CAPACITY OF LAND FOR ALL INCOME HOUSING NEEDS, INCLUDING EMERGENCY HOUSING. INCLUDE A TABLE SHOWING THE BREAKDOWN OF CAPACITY IN ZONES WHICH ADDS UP TO HOUSING NEEDS FOR ALL INCOME LEVELS, INCLUDING EMERGENCY HOUSING. (Supporting documentation of land capacity analysis is encouraged.) (Housing Element Book 2: see bottom table of Exhibit 17 on page 40 and Exhibit 20 on page 48.)</p> <p>ANY LIMITATIONS ON SUPPORTIVE HOUSING TYPES (EMERGENCY HOUSING (EH), EMERGENCY SHELTER (ES), PERMANENT SUPPORTIVE HOUSING (PSH), AND TRANSITIONAL HOUSING (TH)) MUST ALLOW THE SITING OF A SUFFICIENT NUMBER OF UNITS AND BEDS NECESSARY TO MEET PROJECTED NEEDS. (Housing Element Book 2: see pages 41-48.)</p> <p>THE ZONING MAP MUST BE CONSISTENT WITH AND IMPLEMENT THE LAND USE MAP AND LAND CAPACITY FINDINGS. (See RCW 36.70A.115(1), WAC 365-196-800)</p>	No	<p>The county has identified that neither baseline conditions nor any of the identified alternative scenarios would provide sufficient land capacity to accommodate projected housing needs for all income segments (see tables 11-15 of the Housing Element Technical Analysis appendix).</p> <p>Before adoption of the final comprehensive plan, the county must identify and evaluate development regulations that will allow sufficient land capacity to accommodate total housing needs and projected housing needs for households at 120% of AMI and below. These should be adopted by the end of the periodic update period, with the exception of any zoning changes that are also needed to be consistent with state middle housing or ADU requirements, which may be adopted by 7/1/25.</p>

	Consistent? Yes/No	Changes needed?
<p>f. Adequate provisions for existing and projected housing needs for all economic segments of the community. RCW 36.70A.070(2)(d) amended in 2021, WAC 365-196-010(g)(ii), WAC 365-196-300(f), WAC 365-196-410 and see Commerce’s Housing Action Plan (HAP) guidance: Guidance for Developing a Housing Action Plan</p> <p>INCLUDE A LIST OF BARRIERS TO AFFORDABLE HOUSING NEEDS, INCLUDING BARRIERS TO EMERGENCY HOUSING AND PERMANENT SUPPORTIVE HOUSING. (Housing Element Book 2: see page 50 and Appendix B.)</p> <p>INCLUDE A LIST OF ACTIONS NEEDED TO REMOVE BARRIERS TO AFFORDABLE HOUSING. (Housing Element Book 2: see page 61 and Appendix B.)</p> <p>Note: Identification of barriers to affordable housing and actions to remove barriers do not need to be in table format, but both items need to be present in the housing element.</p>	Yes	<p>Please reference the Adequate Provisions Documentation –which is included in <i>Appendix A, Housing Element Technical Analysis</i>– in the Housing Element.</p> <p>It would be beneficial to include a few sentences in the Housing Element about this work and refer to the appendix for more details.</p>
<p>g. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:</p> <ul style="list-style-type: none"> • Zoning that may have a discriminatory effect; • Disinvestment; and • Infrastructure availability <p>RCW 36.70A.070(e) new in 2021</p> <p>INCLUDE A STATEMENT OF WHETHER DATA SHOWS IF THERE ARE DISPARATE IMPACTS. NOTE: COMMERCE HAS DATA AVAILABLE FOR ALL JURISDICTIONS ON OUR EZVIEW SITE. (Housing Element Book 3: see pages 19-20.)</p> <p>REVIEW OF HOUSING ELEMENT POLICIES AND REGULATIONS THAT HAVE LED TO THESE IMPACTS. This may be in the housing element, housing needs assessment or the staff report. (Housing Element Book 3: see pages 33-36; this specific evaluation framework is not required.)</p>	Yes	<p>Please reference the following in the Housing Element:</p> <ul style="list-style-type: none"> • <i>Comprehensive Plan Land Use and Housing Elements Policy Review</i>, included in <i>Appendix C, Racially Disparate Impacts</i> • <i>Analysis of Racially Disparate Impacts</i>, included in <i>Appendix B, Housing Availability and Affordability Analysis</i> <p>It would be beneficial to include a few sentences in the Housing Element about this work and refer to the appendices for more details.</p>

	Consistent? Yes/No	Changes needed?
<p>h. Establish policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions. RCW 36.70A.070(2)(f) new in 2021</p> <p>INCLUDE POLICIES TO ADDRESS THESE IMPACTS, OR THAT ADDRESS DEVELOPMENT OF MORE AFFORDABLE HOUSING, PRESERVATION OF EXISTING AFFORDABLE HOUSING, AND PROTECTION OF EXISTING HOUSEHOLDS. (Policies: Housing Element Book 3, see pages 36-39 and Appendix C of Housing Element Book 2; Regulations: Housing Element Book 3, pages 43-44.)</p>	Yes	
<p>i. Identification of areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments. RCW 36.70A.070(2)(g) new in 2021</p> <p>DISCUSSION AND/OR MAP OF AREAS THAT MAY BE AT RISK OF DISPLACEMENT. (COMMERCE AND PSRC HAVE MAPS AVAILABLE, AND INCLUSION OF ONE WOULD MEET THIS REQUIREMENT.) (Housing Element Book 3; see pages 27-31.)</p> <p>Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing. RCW 36.70A.070(2)(h) new in 2021</p> <p>SEE H ABOVE.</p>	Yes	

Consistency is required by the GMA

	Consistent? Yes/No	Changes needed?
<p>b. All plan elements must be consistent with each other. RCW 36.70A.070 (preamble) and WAC 365-196-500</p> <p>ENSURE CAPITAL FACILITIES, TRANSPORTATION AND UTILITIES ELEMENTS INCLUDE IMPROVEMENTS TO SUPPORT ADDED HOUSING DENSITY AND CONSIDER UNDERSERVED AREAS. LIKELY CONSIDERATIONS WILL INCLUDE SYSTEM IMPROVEMENTS AND PRIORITIZING AND FUNDING THIS WORK. (Housing Element Book 2: see LCA Step 1.3 “Identify gaps in utility infrastructure and services” on page 22, and “Identify related infrastructure and service needs” on page 77.)</p>	TBD.	Please ensure the county is planning for capital facilities, utilities, and transportation to support the zoning changes needed to provide sufficient land capacity for housing needs at all income levels.

Public Participation

<p>a. Plan ensures public participation in the comprehensive planning process. RCW 36.70A.020(11), .035, and .140, WAC 365-196-600(3) provide possible public participation choices.</p> <p>THE PUBLIC PARTICIPATION PLAN SHOULD SHOW EFFORTS TO ENGAGE VULNERABLE POPULATIONS, OVERBURDEDED COMMUNITIES, AND THOSE WHO MAY HAVE BEEN DISPARATELY IMPACTED BY HOUSING POLICIES. (Housing Element Book 3: see pages 15-19.)</p>	Yes	
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Section II: Development Regulations

Must be consistent with and implement the comprehensive plan. [RCW 36.70A.040](#), [WAC 365-196-800](#) and [810](#)

Zoning Code

	Consistent? Yes/No	Changes needed?
<p>a. Zoning designations are consistent and implement land use designations that accommodate future housing needs by income bracket as allocated through the countywide planning process. (RCW 36.70A.070(2)(c) - Amended in 2021 with HB 1220)</p> <p>If subject to middle housing requirements in RCW 36.70A.635, see material on Commerce's Middle Housing webpage.</p> <p>ZONING MAP AND TEXT ALLOW FOR THE HOUSING TYPES AND DENSITIES IN THE LAND CAPACITY ANALYSIS.</p> <p>THESE ZONING CHANGES MUST BE COMPLETE BY THE END OF THE PERIODIC UPDATE PERIOD.</p>	TBD	See comment on item e. above (land capacity).
<p>b. [FOR CITIES] Permanent supportive housing or transitional housing must be allowed where residences and hotels are allowed. RCW 35A.21.430 amended in 2021, RCW 35.21.683, amended in 2021, (HB 1220 sections 3-5)</p> <p>“permanent supportive housing” and “transitional housing” is defined in RCW 36.70A.030; “transitional housing” is defined in RCW 84.36.043(3)(c)</p> <p>[FOR CITIES AND COUNTIES] ANY LIMITATIONS ON PERMANENT SUPPORTIVE HOUSING AND TRANSITIONAL HOUSING MUST BE CONNECTED TO PUBLIC HEALTH AND SAFETY AND ALLOW THE SITING OF A SUFFICIENT NUMBER OF UNITS AND BEDS NECESSARY TO MEET PROJECTED NEEDS. (Housing Element Book 2: see pages 41-48.)</p>	No	The code currently groups all STEP housing types under use type “transitory accommodations”. As identified in <i>Table 20: PSH and emergency housing barrier review checklist</i> in the Housing Element Technical Analysis appendix, all STEP housing types should be defined in code, and allowed in sufficient zones to accommodate projected needs (RCW 36.70A.070(2)(c)) .
<p>c. [FOR CITIES] Indoor emergency shelters and indoor emergency housing shall be allowed in any zones in which hotels are allowed, except in cities that have adopted an ordinance authorizing indoor emergency shelters and indoor emergency housing in a majority of zones within one-mile of transit. Indoor emergency housing must be allowed in areas with hotels. RCW 35A.21.430 amended in 2021, RCW 35.21.683, amended in 2021, (HB 1220 sections 3-5)</p> <p>“emergency housing” is defined in RCW 36.70A.030(14)</p> <p>[FOR CITIES AND COUNTIES] ANY LIMITATIONS ON EMERGENCY HOUSING AND EMERGENCY SHELTER MUST BE CONNECTED TO PUBLIC HEALTH AND SAFETY AND ALLOW THE SITING OF A SUFFICIENT NUMBER OF UNITS AND BEDS NECESSARY TO MEET PROJECTED NEEDS. (Housing Element Book 2: see pages 41-48.)</p>	No	See above

Residential parking

KCMC Chapter 17.490: A number of code sections were not consistent with RCW 36.70A.622, but were not updated in this submission. Suggested comment: “Please be aware that the county should update its code to implement all requirements in RCW 36.70A.622 as soon as possible.”

Parking standards for specified housing types		
These standards apply only to particular housing types and locations		
Code requirement	Consistent? Yes/No	Changes needed?
<p>The following standards apply to accessory dwelling units:</p> <ul style="list-style-type: none"> No off street parking is required within one-half mile of a major transit stop. RCW 36.70A.681(2)(a)(i) No more than one off-street parking space per accessory dwelling unit is required on lots under 6,000 square feet (before any zero lot line subdivisions or splits). RCW 36.70A.681(2)(a)(ii) No more than two off-street parking spaces per unit are required on lots greater than 6,000 square feet (before any zero lot line subdivisions or splits). RCW 36.70A.681(2)(a)(iii) <p>Exceptions:</p> <ul style="list-style-type: none"> If an empirical parking study is submitted to Commerce showing that meeting these requirements would pose a hazard to pedestrians or drivers. RCW 36.70A.681(2)(b)(i) If the city has adopted or substantively amended ADU regulations within the four years previous to June 11, 2020. RCW 36.70A.698 (3) Areas within a one mile radius of SeaTac airport. RCW 36.70A.681(2)(b)(ii) 	Yes	We suggest updating KCMC 17.490.030 to be consistent with parking requirements for ADUs in 17.415.010(H)(1) and (K).
<p>The following standards apply to middle housing types for cities subject to middle housing requirements under RCW 36.70A.635:</p> <ul style="list-style-type: none"> No off-street parking is required within one-half mile walking distance of a major transit stop. RCW 36.70A.635(6)(d) No more than one off-street parking space per unit is required on lots 6,000 square feet or less before any zero lot line subdivisions or splits. RCW 36.70A.635(6)(e) No more than two off-street parking spaces per unit are required on lots greater than 6,000 square feet (before any zero lot line subdivisions or splits). RCW 36.70A.635(6)(f) 	No	KCMC 17.490.030 should be updated to reflect that no off-street parking is required for middle housing types (e.g., townhouses and cottage housing) within one-half mile walking distance of a major transit stop, and that no more than one off-street parking space per unit is

<p>Exceptions:</p> <ul style="list-style-type: none"> • If an empirical parking study is submitted to Commerce showing that meeting these requirements would pose a hazard to pedestrians or drivers. RCW 36.70A.635(7)(a) • Areas within a one mile radius of SeaTac airport. RCW 36.70A.635(7)(b) 		<p>required on lots 6,000 sq. ft. or less for these housing types.</p>
<p>The following standards apply to co-living housing:</p> <ul style="list-style-type: none"> • No off-street parking is required within one-half mile walking distance of a major transit stop. RCW 36.70A.535(3)(a)(i) • No more than 0.25 off-street parking spaces are required per sleeping unit. RCW 36.70A.635(6)(e) <p>Exceptions:</p> <ul style="list-style-type: none"> • If an empirical parking study is submitted to Commerce showing that meeting these requirements would pose a hazard to pedestrians or drivers. RCW 36.70A.635(7)(a) • Areas within a one mile radius of SeaTac airport. RCW 36.70A.635(7)(b) 	<p>No</p>	<p>KCMC 17.490.030 should be updated to reflect that no more than 1 space is required per bedroom for housing units affordable to very- or extremely- low income households within one-quarter mile of a high capacity transit stop.</p>
<p>For housing units that are affordable to very low-income or extremely low-income individuals <u>AND</u> are located within one-quarter mile of a transit stop that receives transit service at least two times per hour for twelve or more hours per day, minimum parking requirements are no more than one parking space per bedroom, or 0.75 space per unit¹. RCW 36.70A.620(1)</p> <p>Exception: If the jurisdiction determines that on-street parking is infeasible for the housing unit due to lack of street parking capacity, space constraints, or other reasons supported by evidence.</p>	<p>No</p>	<p>KCMC 17.490.030 should be updated to reflect that no more than 1 space is required per bedroom for housing units affordable to very- or extremely- low income households within one-quarter mile of a high capacity transit stop.</p> <p>Additionally, please specify that parking requirements for studio apartments do not exceed 0.75 spaces per unit in these areas.</p>
<p>For housing units that are specifically for seniors or people with disabilities <u>AND</u> are located within one-quarter mile of a transit stop that receives transit service at least four times per hour for twelve or more hours per day, there are no minimum parking requirements for residents. Parking requirements for staff or visitors may be required. RCW 36.70A.620(2)</p> <p>Exception: If the jurisdiction determines that on-street parking is infeasible for the housing unit due to lack of street parking capacity, space constraints, or other reasons supported by evidence.</p>	<p>No</p>	<p>KCMC 17.490.030 should be updated to reflect that no off-street parking is required for residents of housing for seniors or people with disabilities within one-quarter mile of a high capacity transit stop.</p>

¹ Parking requirements for studio apartments should not exceed 0.75 parking spaces per unit.

<p>For market rate multifamily housing units that are located within one-quarter mile of a transit stop that receives transit service at least four times per hour for twelve or more hours per day, minimum parking requirements are no more than one parking space per bedroom, or 0.75 space per unit. RCW 36.70A.620(3)</p> <p>Exception: If the jurisdiction determines that on-street parking is infeasible for the housing unit due to lack of street parking capacity, space constraints, or other reasons supported by evidence.</p> <p><i>Note: Minimum parking standards should not exceed 0.75 parking spaces per unit for studio apartments.</i></p>	No	<p>KCMC 17.490.030 should be updated to reflect that no more than 1 space is required per bedroom for market-rate multifamily units within one-quarter mile of a high capacity transit stop.</p> <p>Additionally, please specify that parking requirements for studio apartments do not exceed 0.75 spaces per unit in these areas.</p>
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ADUs

Accessory dwelling units (ADU)s		
<p><i>[CITIES, TOWNS AND UNINCORPORATED UGAS IN COUNTIES] Allow two ADUs per lot within urban growth areas (UGAs) by six months after the next periodic update due date. If a city or county does not amend its rules to be consistent with the law, the statute will "supersede, preempt and invalidate any conflicting local development regulations. HB 1337, passed in 2023.</i></p> <p>See Commerce's Guidance for Accessory Dwelling Units in Washington State.</p>	Consistent? Yes/No	Changes needed?
<p>a. ADUs defined as consistent with a dwelling unit located on the same lot as a single-family housing unit, duplex, triplex, townhome or other housing unit. RCW 36.70A.696(6)</p> <p>Dwelling unit is defined as a residential living unit that provides complete independent living facilities for one or more persons and that includes permanent provisions for living, sleeping, eating, cooking and sanitation. RCW 36.70A.696(1)</p>	No	<p>NOT AMENDED WITH SUBMISSION:</p> <p>Any updates needed to be consistent with RCW 36.70A.696(6) and RCW 36.70A.696(1) should be completed by 7/1/25.</p>
<p>b. Within urban growth areas, cities and counties must allow AT LEAST two ADUs on all lots that meet the minimum lot size in zoning districts that allow for single-family homes. RCW 36.70A.681(1)(c) The ADUs may be:</p> <p>Two attached ADUs such as unit in a basement, attic, or garage; One attached ADU and one detached ADU; or Two detached ADUs, which may be comprised of either one or two detached structures, and Conversion of an existing structure, such as a detached garage. RCW 36.70A.681(1)(j)</p> <p>Cities and counties are not authorized to allow construction of ADUs in locations where development is restricted under other laws, rules, or ordinances due to physical proximity to</p>	Yes	

c. Must allow a gross floor areas of at least 1,000 square feet within UGAs. RCW 36.70A.681(1)(f)	Yes	
d. The city or county may not establish roof height limits on an ADU of less than 24 feet, unless the height limitation on the principal unit is less than 24 feet, in which case, a city or county may not impose roof height limitation ADUs is less than the height limit that applies to the principal unit. RCW 36.70A.681(1)(g)	Yes	
e. No setback requirements, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review for ADUs that are more restrictive than those for principal units. RCW 36.70A.681(1)(h) . Must allow detached ADUs to be sited at a lot line if the lot line abuts a public alley, unless the city or county routinely plows snow on the public alley. RCW 36.70A.681(1)(i)	Yes	
f. Within UGAs, cities and counties may not require owner occupancy, unless used for short term rentals. RCW 36.70A.680(5)(a) RCW 36.70A.696(9) defines owner as any person who has at least 50% ownership in a property on which an ADU is located. Must allow sale by condominium RCW 36.70A.681(1)(k)	Yes	
g. Parking limits for ADUs are subject to the following: <ul style="list-style-type: none"> • No off street parking may be required within one-half mile of a major transit stop. RCW 36.70A.681(2)(a)(i) • On lots equal to or smaller than 6,000 square feet, no more than one off-street parking space may be required per ADU before any zero lot line subdivisions or lot splits. RCW 36.70A.681(2)(a)(ii) • On lots greater than 6,000 square feet, no more than two off-street parking spaces per ADU may be required before any zero lot line subdivisions or lot splits. RCW 36.70A.681(2)(a)(iii) • If an empirical parking study is submitted to Commerce for certification that a certain area would be unsafe is less parking was required RCW 36.70A.681(2)(b)(i). • Areas within a one mile radius of SeaTac airport. 	Yes	You may wish to update or remove KCMC 17.415.010(H)(1)(c) as it conflicts with 17.415.010(K), and is inconsistent with statutory requirements.
h. Impact fees on the construction of accessory dwelling units are no greater than 50 percent of the impact fees that would be imposed on the principal unit. RCW 36.70A.681(1)(a) Also RCW 82.02.060 requires that jurisdictions adopt a schedule of proportional impact fees area required by	N/A	
i. The code does not require public street improvements as a condition of permitting ADUs. RCW 36.70A.681(1)(l)	Yes	

Comments for Kitsap County Climate and Resilience Element

Kitsap County is not obligated to meet the climate-related changes to GMA until 2029. However, we appreciate that you already integrated many climate goals and policies throughout your comprehensive plan.

Commerce is updating the Washington Administrative Code (WAC) to set minimum standards for compliance with HB 1181 (Laws, 2023). Rulemaking will be complete by the end of 2025, and we will regularly [ask for feedback](#). Your 2029 implementation progress report will need to include climate change and resiliency policies that meet those standards, so I invite you to engage with our team over the next year.

We recognize that your plan includes a high level of consistency with regional and county climate planning as follows:

- Kitsap County is part of the [Puget Sound Regional Council's Vision 2050](#), utilizing an emission inventory as a basis for its greenhouse gas (GHG) emission reduction goals, objectives, and policies to meet the state's targets, which has been incorporated with Climate Change Policy 12.1.
- There are a number of goals and policies that address the climate impacts of extreme heat, drought, sea level rise, and flooding, which are consistent with climate resilience planning guidance.
- An emissions inventory has been completed and there are numerous goals and policies designed to reduce GHG emissions within the largest emission sectors of transportation, zoning and development, and buildings and energy.

Things to consider as you move forward:

- Climate change and resiliency [guidance](#): Commerce regularly updates the periodic checklists and guidance documents regarding climate change and resiliency. Be sure to review these updates with future submittals.
- New voluntary approval process: Per RCW 36.70A.096, a county or city that develops a GHG emissions reduction sub-element may submit it to Commerce for approval. If your city is interested, then they must notify Commerce in writing 120 days prior to applying for approval of the sub-element.



Village Green Community Center

26159 Dulay Road NE, Kingston, WA 98346

www.myvillagegreen.org

To: Kitsap County Commissioners
Eric Baker

October 15, 2024

From: Board of Village Green Metropolitan Park District Commissioners

Re: Draft Kitsap County Comprehensive Plan Update, Kingston Sub-Area Plan

Commissioners:

Please remove from the draft Plan update those items and phrases highlighted below. This verbiage refers directly or indirectly to our jurisdiction, and was inserted without discussion with us. While we might be in favor of the stated actions, we are not able to weigh in on these items now.

- Kingston Goal 18. Ensure public participation in development of plans for maintenance and operation of parks, open space, fields, and facilities in the Kingston area including volunteer efforts.
- Kingston Policy 18.1. Coordinate discussions of new, renovated, or existing parks and open space plans and facilities with community groups (e.g., Kingston Community Advisory Council, Rotary, Village Green Metropolitan Park District, Chamber, Port of Kingston) and residents.
-]Kingston Goal 19. Support the Village Green Community Center as a central aspect of the Kingston UGA.
- Kingston Policy 19.1. Consider the Village Green property and facilities when locating new community activities and assets in Kingston.
- Kingston Policy 19.2. Leverage the Village Green Community Center to provide increased access to County services by north county residents and businesses. Ideas include office hours by the County Commissioner and key department teams (DCD), pop-ups to offer services or explain new projects.
- Kingston Goal 12. Monitor housing types including emergency homeless housing and provide policy direction to facilitate adequate housing for all economic segments living in the Kingston UGA.

- Kingston Policy 12.2. Work with Kingston Community Advisory Council to support ongoing efforts to provide severe weather shelter services and/or warming stations in public buildings.
- Kingston Policy 17.3. Develop dog parks within or near the Kingston UGA and establish a program for their maintenance and support.
- Kingston Strategy 17.d. Establish a plan, budget, and volunteer group for the upkeep of the dog park facility in coordination with the local parks district.

Thank you. If you have questions, please direct them to Commissioner Bobbie Moore: bobbie@myvillagegreen.org, or via the Village Green Community Center at 360-297-1263.

From: [Beth Berglund](#)
To: [Comp Plan](#)
Cc: [Christine Rolfes](#); [Eric Baker](#)
Subject: Comments on the final draft Comp Plan
Date: Monday, October 21, 2024 11:39:50 AM

[**CAUTION:** This message originated outside of the Kitsap County mail system. **DO NOT CLICK on links or open attachments** unless you were expecting this email. If the email looks suspicious, contact the Helpdesk immediately at 360-337-5555, or email at Helpdesk@kitsap.gov]

The following are my questions and/or comments on the main part (outside the Kingston Subarea Plan) of the final draft of the Comp Plan doc.

Pages 13, 14, and 19: I'd like to see the GMA Goals explicitly referenced and listed in some way in the Comp Plan so it's clear that we embrace these as guiding principles for decisions at the County level as well.

1. Urban growth. Encourage development in urban areas.
2. Reduce Sprawl. Reduce the inappropriate conversion of undeveloped land.
3. Transportation. Encourage efficient multimodal transportation systems.
4. Housing. Plan for and accommodate housing affordable to all economic segments.
5. Economic development. Encourage economic development throughout the state.
6. Property rights. Private property shall not be taken for public use without just compensation having been made.
7. Permits. Applications should be processed in a timely and fair manner.
8. Natural resource industries. Maintain and enhance natural resource-based industries.
9. Open space and recreation. Retain open space, enhance recreational opportunities.
10. Environment. Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.
11. Citizen participation and coordination. Encourage the involvement of citizens.
12. Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate.
13. Historic preservation. Identify and encourage preservation.
14. Climate change and resiliency. Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies adapt to and mitigate the effects of a changing climate.
15. Shoreline management ([RCW 36.70A.480](#))

Page 40: The map illustrates how close the boundaries of many of the UGAs are in the central part of the County. Some have suggested that the Kingston UGA should be extended to the west edge of the George's Corner LAMIRD or even beyond. I'd like to see a commitment by the County in this plan to address the WA GMA goal "reduce sprawl. Reduce the inappropriate conversion of undeveloped land". As Kingston and Poulsbo grow, holding the line on rural development and sprawl is going to be critically important.

Page 60, Land Use Policy 14.3. Is there a reason the County has chosen to use the word "limit" instead of the word "reduce" which is the word that's used in the GMA planning goals

/ RCW? I think there is power in adopting GMA-aligned terminology since there could be court decisions that rely on specific terminology.

Page 62: while the below may be true in part, shouldn't this explanation also reference that some development exists in rural settings because they pre-dated the GMA and are inconsistent with how we would protect rural character today? In the absence some may assume that what they see in rural settings are aligned with smart planning outcomes which isn't the case.

"Kitsap County's rural area consists of differing natural features, landscape types, and land uses. Rural land uses consist of both dispersed and clustered residential developments, farms, wooded lots, and small and moderate-scale commercial and industrial uses that serve rural residents as their primary client. Rural landscapes encompass a full range of natural features including forested expanses, rolling .."

Page 62: I'd like to see the reference to recreation be re-phrased / more specific and focused on low impact forms of recreation. i.e., "...abundance of trees, enjoyment of nature-based outdoor recreation, views of water..." For example, rural appropriate water recreation is access to shorelines for beach walks, wading/swimming and paddling and access to public boat ramps for fishing. Not swimming pools and spray parks.

This quality of life includes a sense of quiet, community, and a slower pace of life. Rural characteristics include the abundance of trees, access to recreation, views of water and mountains, and a quiet, unregimented atmosphere.

Page 64: Is it true that we cannot create/add new LAMIRDS and that each existing one shouldn't spread if possible? Wouldn't the NKU project proposal in effect create a new Type 2 (recreation / tourism) LAMIRD?

"(ii) The intensification of development on lots containing, or new development of, small-scale recreational or tourist uses, including commercial facilities to serve those recreational or tourist uses, that rely on a rural location and setting, but that do not include new residential development. A small-scale recreation or tourist use is not required to be principally designed to serve the existing and projected rural population. Public services and public facilities shall be limited to those necessary to serve the recreation or tourist use and shall be provided in a manner that does not permit low-density sprawl;"

Page 65: For the Port Gamble LAMIRD it would be beneficial to the reader to have more specifics about the scale / nature of re-development being planned. This will help the reader to understand the impacts on traffic from both new residents and anticipated tourism flowing through the Streibels Corner area. With the type of development planned, is it anticipated that Port Gamble will shift from a LAMIRD to a UGA?

Page 65: George's Corner seems like an odd fit with the other Type 1 LAMIRDS which are more rural villages.

Page 69, Land Use Policy 16.1 and 16.2, are examples strategies associated with these policies to lean toward dispersed and away from clustered housing?

Page 70, Land Use Policy 17.3, we have a limited opportunity to what is sometimes less popular to reinvest in existing rather than alter natural land for something new. The example that comes immediately to mind are the issues with fair and poor athletic fields on school properties versus building new sports fields.

Page 75, Land Use Goal 20, what are the criterion for what gets classified a mineral resource area? Will the sand pit on 104 meet that criteria?

Page 82, Economic Development, etc..since this is a long range planning document, we seem to be missing consideration of planning for the needs of future generations.

Page 85, are we missing an opportunity here to strive for ED of the type that will make our community more environmentally resilient / sustainable? e.g., child care, healthcare, nurturing businesses.

Page 85, Goal 4, In this context the use of the word “Sustainability” isn’t clear. “life-sustaining” or “Environmental Sustainability” may be more clear phrasing than sustainable since that can mean economic sustainability. Also “...healthy and life-sustaining...”

Page 95, do the elements of the KNRAMP framework stand alone outside of the Comp Plan? It's defined as a Key Term in the report but not mentioned anywhere else. How is this framework executed?

Page 152, 1e, Somewhere in here, there needs to be a goal to protect our heritage parks from being “loved to death”. Not just an assessment before implementation but ongoing assessments that will allow the county to respond and restrict as necessary.

Page 155, 4a, A reference to collaborating with the Port of Kingston and integration to their Strategic Plan would be relevant here.

Parks section holistically doesn’t appear to be sufficiently protective of the parks from significant deterioration. As a matter of fact, we should be looking to improve the ecological function of our Heritage parks as they recover from being degraded by their recent history in lumber production service.

Thanks so much to the staff who’ve worked so hard to complete this update to the Plan.

Beth Berglund
360-620-0389

I submit these comments on the Final Draft Kitsap County Comprehensive Plan for your consideration.

Thank you for the tireless work that has gone into this effort.

Betsy Cooper, Kingston WA - Betsycooper1@gmail.com

Vision/Mission – While the mission is straightforward and conveys the interest of the Commissioners and Staff in creating a vibrant place to live for its citizens and that the natural world enhances citizen’s experience as currently written, it does not include a recognition of the intrinsic values of the natural world and its importance. It is mentioned on page 13/14 “...commitment to maintaining and restoring ecosystem thru habitat conservation, restoration of waterways and reducing GH gasses”; and on page 15 “... encourage environmental protection through the dual lenses of intrinsic value and as an asset...”. Including some nod in the mission/vision to recognize our natural land and water resources would provide an important underpinning to the Goals and Policies that discuss their importance.

Page 18 – Explanation of Preferred Alternative – This section describes the rationales for choosing what was basically Alternative 2 initially, with other aspects added. However, the intent of choosing this Alternative appears to indicate the County embraces the idea that sprawl (urban land uses spreading out into the rural area unchecked) should be avoided. Since this plan is meant as a roadmap for the County and all its staff, this summary of the Preferred alternative should say in a strong and definitive way, that sprawling intense development (higher density residential, urban commercial) should be eliminated and that this Comp Plan is working towards that effort.

Making this point in this plan will also assist in guiding the next 2025 “year of the Rural” in a strong way.

Land Use in Rural

Page 38 – strategies for Goal 8 – Food security and Production – Consider adding a separate Strategy on Agriculture land protection. Rather than including Rural agriculture in Strategy 8a – add a separate strategy affirming the County’s commitment to preserving and enhancing Rural Agriculture. This strategy could include something like “explore creating an agricultural overlay or designating agricultural zones”.

Page 69-Strategy 16.d – This strategy highlights the need for a particular tools be created that are useful in the UGAs. Such tools should be excluded from use in the rural areas. As an example, clustered housing is a useful tool in the Urban context to allow density and to allow additional open space in a denser urban environment. It is not appropriate for use in

a rural setting. Its use also creates the potential for the future need for extending urban infrastructure to a rural area thus encouraging that areas' shift towards urban.

Therefore, Cluster development should be disallowed in rural areas.

Page 62-75 – Rural Lands – This section discusses nothing about the large Heritage Park areas that are part of the Kitsap County Rural Area. While page 147 calls out Heritage Parks and their importance this way:

“Nearly three quarters of all park and open space acreage lies within six heritage parks that have become the cornerstone of Kitsap County’s Park system. A balanced approach that takes into consideration established levels of service, protection of critical areas, historic and cultural values, equitable and inclusive access, and recreation services for the public will be critical to the success of these heritage parks and the park system overall.”

There is no zoning overlay or other special zoning designation for Heritage Parks. They are identified only as public facilities with the designation ‘park’, thus making no distinction between these important, unique areas and the many smaller neighborhood pocket parks or other roadside parks owned by Kitsap County.

These important County resources were major, wise investments made by the County to preserve natural or wooded areas for their natural resources, ecosystem services and public open space benefits. They are very different from the other parks owned or managed by Kitsap County. However, Comp Plan is silent about how they should be considered from a zoning and land use perspective. They deserve an overlay, like the Forest and Mining Resources overlays that identify their attributes and guide land use decision-making adjacent to these important resources. Please consider adding a strategy to develop an overlay or some other clear distinction that provides protection for these parks.

Page 75 – Strategy 20 - Mining Resource lands – Strategy 20a. – This strategy calls for existing mining resource lands to be mapped and identified, particularly so that if such extractive uses occur, that all land adjacent to it (within 800 ft) is apprised of the potential for extractive noise, and other effects of such mining use.

Along Port Gamble Rd Raydiant properties has publicly identified an area in the Rural Wooded zone that they intend to use it in the future for its sand resources. Therefore, this area should be designated as a Mining Resource area, so it is properly noted for its future potential for such heavy industrial extractive uses.

Page 85 – Economic Sustainability – Goal 4 – This Goal understandably and wisely identifies aspects of planning that can sustain viable business. However, this Goal should also focus on incentives and planning tools that foster a variety of jobs to employ the next generation – so that Kitsap is sustainable for future generations. So, a Strategy should be added that expressly acknowledges the aspiration to provide economic viability for future generations.

Page 155 – Water Access – Add to Parks Strategy 4.a “Identify and consider opportunities to increase public access and foster environmental and economic benefits associated with Kitsap Peninsula Water Trails and designation as part of the National Water Trails System.” Please add a strategy that the county will work with Port of Kingston to plan and implement such water access in their land redevelopment strategic planning.

The Port of Kingston owns several waterfronts lots where such water access for kayaks and small boats could be part of their economic development planning and is an accessible and reasonable opportunity for increasing water access in the shallow calm environment of Appletree Cove.

Kingston Subarea Plan -

Page 205, Why are the County and DOT-owned properties along Hwy 104 not in the Countywide Center zone?

- Page 207, Strategy 2.A. Goal 2. Development Standards. This section should say that we'll start in 2025 and revisit every 3 years thereafter.
- Pages 207, Strategy 2.2a, 208 Strategy 5a & page 211 Strategy 12a These contain open-ended language regarding changes in densities, parking requirements, etc. that make it sound like the decisions in this plan are vulnerable to change. The language should be more specific and should indicate the decisions already outlined in other chapters or as regulatory initiatives already being considered. These sections should instead call for implementing those changes.
- Page 208, Goal 6 Economic Development: Tourism, maritime, small business, cottage businesses are included but what's missing are back office (consultancy, legal, call center for a larger business), and other small / medium sized businesses.
- Page 210, Policy 12.2 Severe Weather Shelter should include Kingston Cares along with KCAC.
- Page 212 Policy 16.1 Please add the Tribes to the organizations coordinating for preservation of open space and natural resources.
- Page 212, Policy 16.2 There are references to bodies of water outside the Kingston UGA. e.g., Gamble Bay, Miller Lake, etc. Including places that are outside the UGA boundaries may confuse readers about what's in and out of scope for this subarea plan.
- Pages 214-217 The benefits ferry reservations would provide the Kingston

community are significant. We would like to see the Kingston Subarea plan reflect that. Those references have been removed from this draft.

- Page 214, Policy 18.1 Please add the park stewards' organizations and KEC to organizations engaged in planning maintenance of Parks and Recreations areas.
- Page 214, Policy 19 This addresses the potential for the VGCC to be leveraged in new ways. Strategies should be added to address collaborating with the VG MPD Board of Commissioners to assess that potential and to consider parking capacity.
- Page 214, Strategy 20a Please add Sound Transit and Community Transit in its regional transit considerations.
- Page 214, Policy 20.1 Focus here appears to be within the UGA but to be useful it's critical for people in Kingston to be able to efficiently get to Poulsbo and Silverdale and to connect with Sound Transit and Community Transit.
- Page 216, Strategy 22.e. Why isn't South Kingston between Arness Park and Jefferson Point Rd on the list for wider pedestrian accommodations? There is a potential to achieve this by expanding walking/biking over the ditched areas on the sides of these roads, in the existing right of way, by culverting the existing drainage ditches requiring now additional ROW acquisition.







10.55 Ac

4 lane road

Park

2 lane Rd

To Whom it may Concern,

Shearer Excavation LLC has owned land in South Kitsap County since 2014, parcel #s: 152301-4-009-1006, 152301-4-002-1003 and 152301-4-01-1001 consisting of roughly 10.15 acres. We are requesting said parcel #s be rezoned as Industrial use under the current comprehensive plan, with intentions of being Annexed into the City of Bremerton.

Kevin & Kelly Shearer have owned Shearer Excavation LLC since the doors opened in 2006. Throughout the years our company has evolved to have additional sub-businesses, Shearer Trucking and Northwest Firewood. We as a company have had the privilege of providing jobs for many local residents and had the opportunity of supporting our Navel bases by assisting in many projects throughout Kitsap County.

When we purchased the property in 2014 our vision of growth in the area was one of our main interests. Early on our path we had hopes of rezoning our property into Industrial use with the previous Comprehensive Plan and began taking steps to ensure that this was a possibility. We met with Kitsap County Community Development to go over plan and availability to obtain a grading permit for our property in order to make the land more useable. We were granted a permit in 7/2015 to develop our property. SE has been in compliance with the Department of Ecology for our Storm Water Management Permit. We also met with the Department of Transportation about access to Hwy 3 and was granted an Access Connection Permit in 4/2015. Since 2020 SE has been in touch with Kitsap County regarding rezoning of our property to Industrial use, which was initially shown on the Alternative 3 Map as being considered for rezoning in the future on the Comprehensive Plan. After reviewing the current Comprehensive Plan, we became aware that we were no longer on the rezoning map but a property bordering our property is in the Preferred Alternative plan for Kitsap County's updated to its Comprehensive Plan and is being shown as Industrial use (parcel #152301-1-001-1000). We are an adjoining piece of property to the accepted property (parcel #152301-1-001-1000) with Highway access and are requesting to be accepted into the same rezoning to Industrial use as said property.

Shearer Excavation LLC, (Kevin & Kelly Shearer) is up to date on all Kitsap County, SDAP/SFR, DOT and DOE permits.

Kitsap County Permit # 1403063

Comprehensive Plan Application # 81

SDAP/SFR Permit # 1403063

Department of Transportation Permit # 50086

Department of Ecology Permit # WAR303253

Thank you,

Kevin and Kelly Shearer

DRAFT



Kitsap County Department of Community Development
614 Division Street, MS-36, Port Orchard, Washington 98366
VOICE (360) 337-5777 (Kitsap One) * <https://www.kitsapgov.com/>

VOICE (360) 337-5777 (Kitsap One) * <https://www.kitsapgov.com/>
 614 Division Street, MS-36, Port Orchard, Washington 98366



** This map is not a substitute for field survey **

1,000 ft



Comments

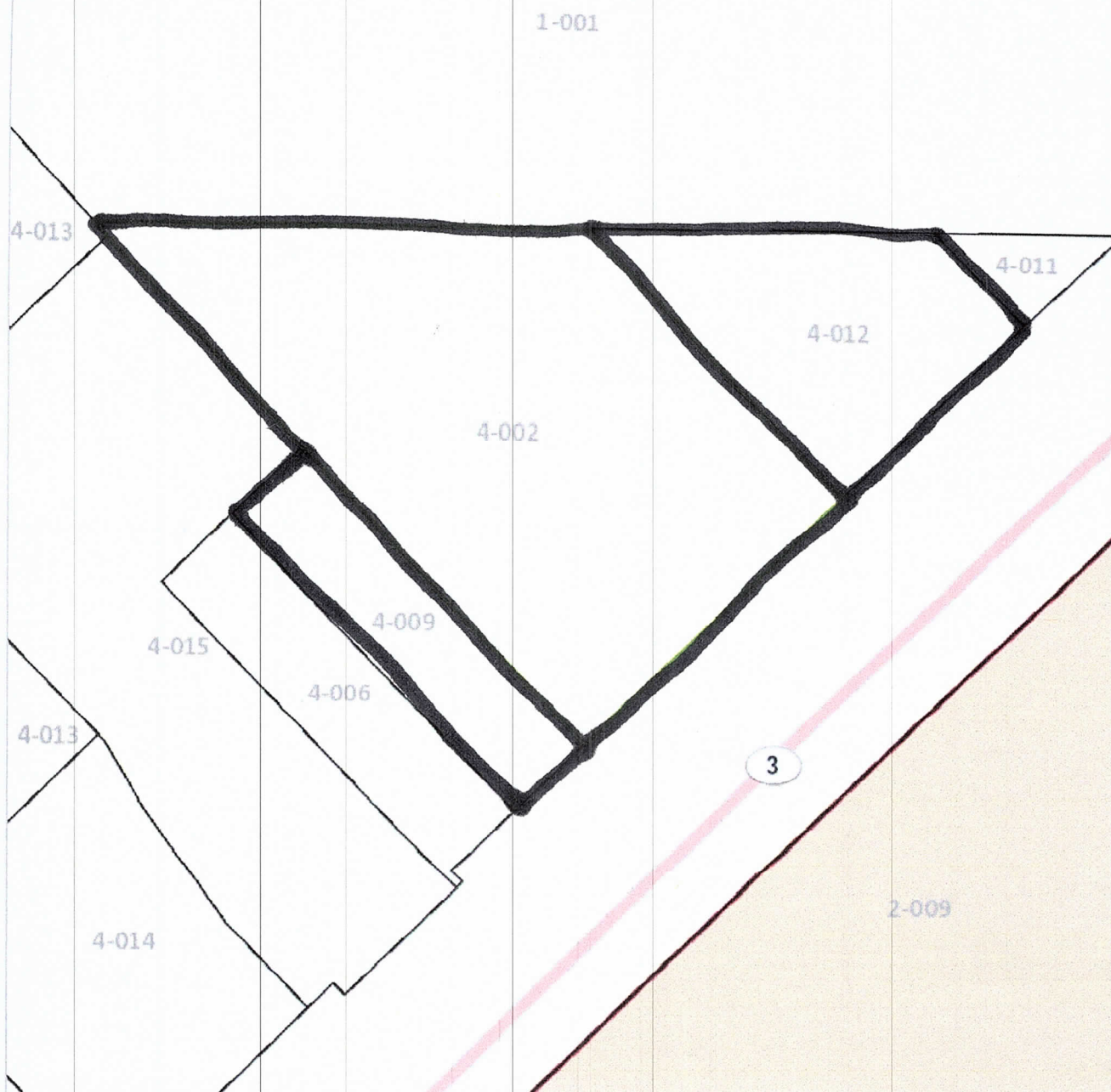
152301-1-001-1000 - 170.40 Acres



Included in Referred
Alternative Plan as
Industrial Use.

Map Scale: 1 : 2,400

Printed: Monday, Oct 21, 2024



** This map is not a substitute for field survey **

200 ft



Comments



152301-4-009-1006

152301-4-002-1003

152301-4-012-1001

= 1.36

= 6.64

= 2.15

} = 10.15 Acres

110

General

Parcel #: 152301-4-009-1006

****NO SITUS ADDRESS ****

Taxpayer Name SHEARER KEVIN & KELLY CO TRUSTEES

Mailing Address PO BOX 1802
BELFAIR, WA 98528

Parcel No. 152301-4-009-1006

Account ID 1055250

Site Address ****NO SITUS ADDRESS ****

Status Active

Property Class 910 - Undeveloped land

General

Parcel #: 152301-4-002-1003

****NO SITUS ADDRESS ****

Taxpayer Name SHEARER KEVIN & KELLY CO TRUSTEES

Mailing Address PO BOX 1802
BELFAIR, WA 98528

Parcel No. 152301-4-002-1003

Account ID 1055128

Site Address ****NO SITUS ADDRESS ****

Status Active

Property Class 910 - Undeveloped land

General

Parcel #: 152301-4-012-1001

9875 STATE HWY 3 SW
BREMERTON, WA 98312

Taxpayer Name SHEARER KEVIN & KELLY CO TRUSTEES

Mailing Address PO BOX 1802
BELFAIR, WA 98528

Parcel No. 152301-4-012-1001

Account ID 2654283

Site Address 9875 STATE HWY 3 SW
BREMERTON, WA 98312

Status Active

Property Class 910 - Undeveloped land



Site Development Activity Permit - Single Family Residence



Site Development

Permit Number

14-03063

Permit has been re-issued (after expiration or after being revised).

Current Fees

\$0⁰⁰

Additional fees may be required

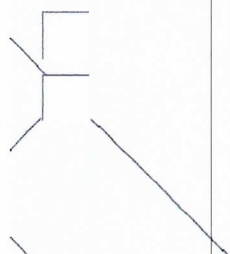
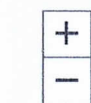
▲ Project Information

Location

No Current Site Address

Parcel

152301-4-002-1003



County of Kitsap, Bureau of...

Created

--

Submitted

8/21/2014

Approved

6/18/2015

Issued

7/22/2015

Closed

--

Permit Expires

1/31/2025

▲ Related Permits

Additional permits identified for your project

* Required for review and approval of your application

Required before the parent permit can be closed

Permit Type

Reference Number

Current Status

Right of Way Permit

--

▲ Permit Contacts

Contact

SHEARER KEVIN & KELLY
shearerexcavation@hotmail.com
(360) 340-3118

SHEARER KEVIN & KELLY
shearerexcavation@hotmail.com
(360) 340-3118

ENVIROTECH ENGINEERING PLLC
envirotech@geotechnicalinfo.com
1-360-275-9374

Role

Submitter of the Application

Owner of Record

Project Engineer/Engineer of Record

▲ Permit Details

Permit Base Hours

27

▲ Permit Submittals

At least 1 file must be uploaded for each submittal requirement

Upload documents in PDF format on the following screen. The name of each file should simply identify what each submittal document is. Examples: "Floor Plans", "Engineered Structural Plans", "Engineered Civil Plans", "Site Plan"

Click the files link on the far right of the submittal item to upload. The files link will indicate how many documents have been uploaded.

Not uploading all required submittal documents will delay the processing of your permit.

* Required for Application

🕒 Required before permit can be closed

Submittal Name	Received	Version	Status
Upload documents required prior to final inspection *	--	1	Pending
No submittal item required for this line. Internal Use Only.	8/26/2014	1	Approved
Completed Online Permit Form	8/21/2014	1	Approved
Supplemental Application	8/21/2014	1	Approved
Environmental (SEPA) Checklist	8/21/2014	1	Approved
Engineered Drainage Report	6/3/2015	1	Approved
Engineered drainage plans	6/3/2015	1	Approved
Stormwater Pollution Prevention Plan (SWPPP) Drawings	--	1	Pending
Stormwater Pollution Prevention Plan (SWPPP) Narrative	8/21/2014	1	Approved
Kitsap Public Health District Documentation	2/9/2015	1	Approved

← Return

🏠 PUBLIC INFORMATION

Submittal Name

Received

Version

Status

Performance for Erosion and Sediment Control covenant

7/1/2015

1

Approved

▲ Permit Parcels

i Parcel(s) associated with your permit.

Parcel Number

Primary Owner

Primary Address

152301-4-002-1003

SHEARER KEVIN & KELLY CO TRUSTEES

**NO SITUS ADDRESS ** UNKNOWN, WA 00000

▲ Permit Conditions

The conditions listed below are standard for all permits of this type and may not apply to your specific permit. Once your permit is issued, all conditions listed are applicable to your permit.

Completion, to the satisfaction of Development Engineering, of all work indicated on the plans

Awaiting Verification

The engineer shall provide certification to Kitsap County that the drainage conveyance pipes and structures were installed in compliance with the accepted plans.

Awaiting Verification

The initial permit fee for all SDAPs applies to review and processing through permit approval. All review, inspection and processing after the date of the approval letter will be charged at the DCD hourly rate. All fees must be paid prior to final inspection.

Awaiting Verification

Submittal, by the Project Engineer, of the Operation and Maintenance Manual for privately maintained and/or non-standard stormwater facilities.

Awaiting Verification

Submittal of an Onsite Stormwater Maintenance Covenant is required for private storm drainage facilities, which gives Kitsap County the right to inspect the facilities and guarantees the county that the facilities will be properly maintained (enclosed). This covenant must be recorded prior to scheduling the final inspection.

Awaiting Verification

Certification, by the Project Engineer, that all pond side slopes are 2H: 1V or flatter for fenced ponds, and 3H: 1V or flatter for unfenced ponds.

Awaiting Verification

The engineer shall provide certification to Kitsap County that the soils under all pollution generating pervious surfaces have been amended.

Awaiting Verification

Permanent stabilization of the project site.

Awaiting Verification

Provide documentation of concurrence from the Geotechnical Engineer that the project as constructed meets their recommendations.

Awaiting Verification

Certification, by the Project Engineer, that the soils encountered under any infiltration systems are consistent with the design criteria.

Awaiting Verification

Certification by the Project Engineer that the as-built area and volume for the retention pond meets the design criteria.

▲ Permit Bonds

Bond Type

Bond Number

Bond Amt

Issued

Expires

Completed

[← Return](#)

 PUBLIC INFORMATION

▲ Permit Fees

Current Fees \$0.00

Fee totals below may not reflect all fees, including fees calculated by hourly rates.

Fee	Amount	Paid	Balance	Due Now
Site Development Activity Permit - Single Family Residence 14-03063				
Reviewer Hours	\$ 2,892.50	\$ 2,892.50	\$ 0.00	\$ 0.00
Permit Center Base Fee	\$ 90.00	\$ 90.00	\$ 0.00	\$ 0.00
Development Engineering Inspection Hours (Billed monthly)	\$ 617.50	\$ 617.50	\$ 0.00	\$ 0.00
Application Fee Refund/Invoice	-\$3,510.00	-\$3,510.00	\$ 0.00	\$ 0.00
Application Fee Deposit	\$ 3,510.00	\$ 3,510.00	\$ 0.00	\$ 0.00
HD-1003 OTHER LAND USE REVIEW W/BSA OR BC	\$ 109.00	\$ 109.00	\$ 0.00	\$ 0.00
Total	\$ 3,709.00	\$ 3,709.00	\$ 0.00	\$ 0.00

▲ Permit Inspections

There are 16 required inspections for this permit

The inspections listed below are standard for all permits of this type and may not apply to your specific permit. Once your permit has been issued, all inspections listed are applicable to your permit. **Note: Community Development Building Final Inspections (B-Final), Commercial CO Inspection Fire Marshal (FM-CO-Final) and the Final Field Inspections (DE-FFI) are not eligible for next day inspection requests. Please allow two business days when requesting a Final inspection. Reminder: All pets, regardless of size, must be housed or kenneled for any site visit or inspection. Free-roaming dogs or dogs on leads or leashes are not acceptable. Interior inspections, or visits, require dogs to be contained outside or behind closed doors in a separate room. We are not able to accommodate any exceptions to this request. A re-inspection fee may be applied if we need to reschedule your inspection because your pets are not contained.**

Inspection	Date	Status
Requested Permit Reactivation	10/21/2024	Approved
Requested Permit Reactivation	7/8/2024	Permit Extension Request was Denied
Storm Structures and Pipe Alignment	7/26/2023	Progress Inspection Completed
Storm Structures and Pipe Alignment	7/12/2022	Approved
Storm Structures and Pipe Alignment	7/20/2021	Approved
Storm Structures and Pipe Alignment	7/8/2020	Approved
Storm Structures and Pipe Alignment	7/19/2019	Approved
Storm Structures and Pipe Alignment	7/19/2018	Approved
Clearing Limits Flag	7/25/2017	Approved with Exception
DE -Temporary Silt & Erosion Control Inspection; recurring inspection.	7/22/2016	Approved
On-site preconstruction meeting	7/22/2015	Approved
Site visit prior to approval	9/10/2014	Approved
Pond		
Soil Management		
Final Field Inspection		

Inspection**Date****Status**

Optional inspection to produce a punchlist prior to Final inspection.

▲ Permit Approval Steps

Follow the approval process

i Follow your application through the approval process.

Step**Status****Date**

Application Received or mailed by Permit Technician

Approved

8/21/2014

Notice of Application

Approved

2/25/2015

Review Application Submittal for Completeness

Approved

8/26/2014

Building Code Plan Review

Approval Step Not Required (Deleted)

9/3/2014

Environmental Review

Approved

3/24/2015

Health District Approval

Approved

2/26/2015

Planning/Zoning Compliance Review

Approved

4/3/2015

Stormwater Review

Approved

6/18/2015

Survey Review

Approved

6/10/2015

PW - ROW Review

Approved

10/22/2014

▲ Reviews**Review****Started****Completed****Applicant Responded**

3

6/3/2015

6/18/2015

6/18/2015

2

2/9/2015

4/3/2015

6/3/2015

1

8/26/2014

10/31/2014

2/9/2015

Access Connection Permit

Name and Address of Applicant: Kevin Shearer PO Box 1802 Belfair, WA 98528	Permit Number 50086		Width Asphalt
	SR 3	MP 29.330	LT/RT Left
	LONGITUDE LATITUDE		Region Olympic
	County Kitsap		Tax Parcel Number 152301-4-002-1003
	Government Lot Number n/a		
Phone (Optional) 360-340-3118			

Permit Category <input checked="" type="checkbox"/> 1 - Minimum Connection <input type="checkbox"/> 2 - Minor Connection <input type="checkbox"/> 3 - Major Connection <input type="checkbox"/> 4 - Temporary Connection	Current Highway Classification <input type="checkbox"/> 1 - 1320' Minimum Approach Spacing Required <input type="checkbox"/> 2 - 660' Minimum Approach Spacing Required <input type="checkbox"/> 3 - 330' Minimum Approach Spacing Required <input type="checkbox"/> 4 - 250' Minimum Approach Spacing Required <input type="checkbox"/> 5 - 125' Minimum Approach Spacing Required
Access Connection meets current Department location, spacing, and design criteria: <input checked="" type="checkbox"/> Conforming <input type="checkbox"/> Non-Conforming <input type="checkbox"/> Variance	

The Applicant, hereinafter referred to as the "Grantee", having applied for a permit to construct/upgrade, use, and maintain an access connection to serve:

Private Roadway Approach (Kitsap County Tax Parcel 152301-4-002-1003)
No fee, as the approach is existing and no work is anticipated or approved.

The Washington State Department of Transportation or its designee, herein after referred to as the "Department", hereby orders that this permit be granted, subject to the terms and provisions stated upon the General Provisions hereof and Exhibits attached hereto and by this reference made a part hereof:

Exhibit A: Special Provisions 2 Pages
Exhibit B Kitsap County Parcel Map
Exhibit C Picture of Existing Access on SR 3, Milepost 29.33

This permit shall be void unless the construction herein contemplated is started within 90 days of issuance and completed within 120 days of issuance, unless otherwise provided herein.

This permit is accepted (and approved by the Grantee, subject to the terms and provisions as herein set forth.

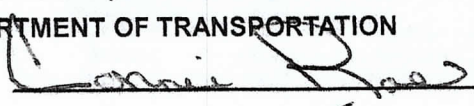
PERMIT HOLDER

By: 

Title: Owner

Date: 4-20-15

DEPARTMENT OF TRANSPORTATION

By: 

Title: Assistant Department

Date: 4-17-2015

General Provisions

1. The Permit Holder, its successors and assigns, agrees to protect the State of Washington, its officers and employees and save them harmless from all claims, actions or damages of every kind and description which may accrue to or be suffered by any person, persons, or property by reason of the acts or omissions of the Permit Holder, its assigns, agents, contractors, licensees, employees or any person whomsoever, in connection with Permit Holder's, its assigns', agents', contractors', licensees' or employees' construction, installation, maintenance, operation, use or occupancy of the right of way or in the exercise of this permit. In case any suit or action is brought against the State of Washington, its officers and employees, arising out of or by reason of any of the above causes, the Permit Holder, its successors or assigns will, upon notice of such action, defend the same at its sole cost and expense and satisfy any judgement against the State of Washington, its officers, or employees: PROVIDED, that if the claims or damages are caused by or result from the concurrent negligence of (a) the State of Washington's agents or employees and (b) the Permit Holder or Permit Holder's agents or employees, this indemnity provision shall be valid and enforceable only to the extent of the negligence of the Permit Holder or the Permit Holder's agents or employees.

The Permit Holder, and on behalf of its assigns, agents, licensees, contractors and employees agrees to waive any claims for losses, expenses, damages or lost revenues incurred by it or its agents, contractors, licensees, employees or customers in connection with Permit Holder's, its assigns', agents', contractors', licensees' or employees' construction, installation, maintenance, operation, use or occupancy of the right of way or in the exercise of this permit against the State of Washington, its agents or employees except the reasonable costs of repair to property resulting from the negligent injury or damage to Permit Holder's property by the State of Washington, its agents, contractors or employees.

2. During the progress of the work, such barriers shall be erected and maintained as may be necessary or as may be directed for the protection of the traveling public; the barriers shall be properly lighted at night.
3. Except as herein authorized, no excavation shall be made or obstacle placed within the limits of the State highway in such a manner as to interfere with the travel over said road.
4. If the work done under this permit interferes in any way with the drainage of the State highway, the Permit Holder shall wholly and at its own expense make such provision as the Department may direct to take care of said drainage.
5. Permit Holder hereby authorizes the Department to enter upon their lands where necessary to construct or reconstruct the permitted access connection and/or construct and maintain traffic control devices and appurtenances.
6. The access connection shall be maintained between the right of way line and the shoulder line of said (highway, frontage service road of said highway, highway and/or frontage service road, "-" Line of said highway) by the Permit Holder, their heirs, successors or assigns.
7. On completion of said work herein contemplated, all rubbish and debris shall be immediately removed and the roadway and roadside shall be left neat and presentable and satisfactory to the Department.
8. The cost of construction or modification of a connection shall be the responsibility of the Permit Holder, including the cost of modification of any connection required as a result of changes on property site use in accordance with WAC 468-51-110.
9. The Department hereby reserves the right to order the change of location or the removal of any structure or structures authorized by this permit at any time, said change or removal to be made at the sole expense of the party or parties to whom this permit is issued, or their successors and assigns.
10. Existing permitted connections impacted by the Department's work program and which, in the consideration of the Department, necessitate modification, relocation, or replacement in order to meet current Department connection location, quantity, spacing, and design standards, shall be modified, relocated, or replaced in kind by the Department at no cost to the Permit Holder. The cost of further enhancements or modification to the altered, relocated, or replaced connections desired by the Permit Holder shall be the responsibility of the Permit Holder.
11. If any changes are made or proposed in the land use, intensity of development, type of traffic, or traffic flow of the property served by this connection permit, the Permit Holder is required to contact the Department to determine if further analysis is needed to determine if the change is significant and would require a new permit and modifications to the connection.
12. All such changes, reconstruction, or relocation by the Permit Holder shall be done in such manner as will cause the least interference with any of the Department's work, and the Department shall in no way be held liable for any damage to the Permit Holder by reason of any such work by the Department, its agents or representatives, or by the exercise of any rights by the Department upon roads, streets, public places, or structures in question.
13. This permit or privilege shall not be deemed or held to be an exclusive one and shall not prohibit the Department from granting other permits or franchise rights of like or other nature to other public or private companies or individuals, nor shall it prevent the Department from using any of its roads, streets, or public places, or affect its right to full supervision and control over all or any part of them, none of which is hereby surrendered.
14. The Department may revoke, amend, or cancel this permit or any of the provisions thereof at any time by giving written notice to the Permit Holder. The Permit Holder shall immediately remove all facilities from the right of way. Any facilities remaining upon the right of way 30 days after written notice of cancellation shall be removed by the Department at the Permit Holder's expense.
15. It is the responsibility of the applicant or Permit Holder to obtain any other local permits or other agency approvals that may be required, including satisfaction of all environmental regulations. It is also the responsibility of the Permit Holder to acquire any property rights necessary to provide continuity from the applicant's property to the Department's right-of-way if the Permit Holder's property does not abut the right of way.
16. The party or parties to whom this permit is issued shall maintain at its or their sole expense the structure or object for which this permit is granted in a condition satisfactory to the Department.
17. Any breach of any of the conditions and requirements herein made, or failure on the part of the Permit Holder of this permit to proceed with due diligence and in good faith after its acceptance, with construction work hereunder, shall subject this permit to cancellation as herein provided.
18. This permit is subject to all applicable provisions of 468-51 WAC, 468-52 WAC, Chapter 47.50 RCW, Chapter 47.32 RCW, and/or Chapter 47.44 RCW, and amendments thereto.

Special Provisions for Highway Encroachments

EXHIBIT A

Permit No. **50086**

Applicable provisions are denoted by ☒

- ☒ 1. No work provided for herein shall be performed until the Permit Holder is authorized by the following Department representative:
- Connie Rae**
WSDOT Olympic Region
8293 Spring Creek Road
Port Orchard WA 98367
360-874-3050
- ☐ 2. Prior to the beginning of construction, a preconstruction conference shall be held at which the Department and the Permit Holder and Permit Holder's engineer, contractor, and inspector shall be present.
- ☒ 3. Should the Permit Holder choose to perform the work outlined herein with other than its own forces, a representative of the Permit Holder shall be present at all times unless otherwise agreed to by the Department representative. All contact between the Department and the Permit Holder's contractor shall be through the representative of the Permit Holder. Where the Permit Holder chooses to perform the work with its own forces, it may elect to appoint one of its own employees engaged in the construction as its representative. Failure to comply with this provision shall be grounds for restricting any further work by the Permit Holder within the State right of way until said requirement is met. The Permit Holder, at its own expense, shall adequately police and supervise all work on the above described project by itself, its contractor, subcontractor, agent, and others, so as not to endanger or injure any person or property.
- ☒ 4. A copy of the permit must be on the job site and protected from the elements at all times during any of the construction authorized by said permit.
- ☒ 5. This permit does not give the Permit Holder or any agent or contractor of the Permit Holder any rights to cut, spray, retard, remove, destroy, damage, disfigure or in any way modify the physical condition of any vegetative material located on the highway right of way, except by written permission from the Department or for purposes as described by No. 6 if denoted below. All restoration shall be done to the satisfaction of the Department at the sole expense of the Permit Holder.
- ☐ 6. If necessary to increase sight distance, brush shall be removed from both sides of the access connection and stumps shall be removed. The indiscriminate cutting of merchantable timber or disfiguring of any feature of scenic value shall not be permitted.
- ☐ 7. The access connection(s) shall be constructed in accordance with the attached
Sufficient length of _____ diameter culvert pipe shall be placed in ditch and laid to a true line and grade.
The access connection(s) shall be surfaced to the limits as shown on the plan with a 150 millimeter (6 inch) minimum compacted depth of gravel base material and a 80 millimeter (3 inch) compacted depth of crushed surfacing top course. Asphalt paving will not be required. Finished grade of the access connection shall be in accordance with the profile control as shown on the attached plan. Directing of surface water from private property to Department right of way will not be permitted, unless otherwise approved by the Department.
- ☐ 8. The access connection(s) shall be constructed in accordance with the attached
Sufficient length of _____ diameter culvert pipe shall be placed in ditch and laid to a true line and grade.
The access connection(s) shall be surfaced to the limits as shown on the plan with a 150 millimeter (6 inch) minimum compacted depth of gravel base material, a 80 millimeter (3 inch) minimum compacted depth of crushed surfacing top course, and paved with a 80 millimeter (3 inch) minimum compacted depth of Asphaltic Concrete Class B unless otherwise specified by the Department. Any existing oil mat on shoulder or roadway shall be removed and new pavement laid to a butt joint with existing pavement. Finished grade of new pavement shall be in accordance with the profile control as shown on attached plan. Directing of surface water from private property onto Department right of way will not be permitted, unless otherwise approved by the Department.
- ☐ 9. All buildings and appurtenances shall be so located at a distance from the right of way line of any State Highway that none of the right of way therefore is required for use of the patrons or customers of any such establishment. Permit Holder shall comply with local building codes. Set-back requirements for the location of buildings in relation to the right of way line are a function of local authorities, and they should be consulted regarding requirements that must be adhered to.

- ☐ 10. The Permit Holder agrees to schedule the work herein referred to and perform said work in such a manner as not to delay the Department's contractor in the performance of his contract.
- ☐ 11. Work within the right of way shall be restricted to between the hours of _____ and _____ and / or _____, and no work shall be allowed on the right of way Saturday, Sunday, or holidays, unless authorized by the Department. Any lane closures must be submitted for approval in advance of use. The hours of permitted closure may differ from the above noted hours.
- ☐ 12. The shoulders, where disturbed, shall be surfaced with crushed surfacing top course _____ minimum compacted depth, or as directed by the Department. The surface of the finished shoulder shall slope down from the edge of pavement at the rate of 5% unless otherwise directed. The restored shoulder must not have any strips or sections less than 0.6 meters (2 feet) wide. The restored shoulder shall be surfaced with _____.
- ☒ 13. The Permit Holder shall be responsible for constructing and maintaining the access connection(s) and appurtenances between the shoulder line of the highway and the right of way line inclusive of surfacing and drainage. The Department has the right to inspect all installations at the time of construction and at any time afterward and to require that necessary changes and repairs be made. Unsatisfactory work will be corrected by the Department, at the Permit Holder's expense, or access may be removed at the Permit Holder's expense. Directing of surface water from private property onto Department right of way will not be permitted.
- ☐ 14. The access aconnection shall be sufficiently surfaced back an adequate distance from the edge of the pavement to prevent any tracking of material onto the highway. Any tracking of material onto the highway shall be subject to enforcement of Chapter 46.61.655 RCW and shall be immediately cleaned up by the Permit Holder or the Permit Holder's agent.
- ☐ 15. Standard highway warning signs designated as "Truck Crossing" sign, plate W8-6, shall be placed and maintained at Permit Holder's expense on each side of the access connection. Signs shall be in evidence only when access is actually being used. If necessary, flagmen shall be provided. Sufficient parking space shall be provided by the Permit Holder outside Department right of way so no vehicles will be parked on said right of way.
- ☐ 16. All manholes, valve covers, and like appurtenances shall be constructed at such an elevation to conform to the shoulder slope from the edge of pavement or as directed by the Department.
- ☒ 17. All slopes, slope treatment, top soil, ditches, pipes, etc., disturbed by this operation shall be restored to their original cross section and condition. All hazards shall be marked by warning signs, barricades, and lights. If necessary, flagmen shall be employed for the purpose of protecting the traveling public. Roadside operations shall be specified by the Department's representative.
- ☒ 18. During the construction and/or maintenance of this facility, the Permit Holder shall comply with the Manual on Uniform Traffic Control Devices for Streets and Highways, (Federal Highway Administration) and Washington modifications thereto. If determined necessary by the Department, the Permit Holder shall submit a signing and traffic control plan to the Department's representative for approval prior to construction or maintenance operations. No lane closures shall be allowed except as approved by the Department representative. Approvals may cause revision of special provisions, including hours of operation.
- ☐ 19. Bond coverage required to ensure proper compliance with all terms and conditions of said permit will be furnished by a Blanket Surety Bond held by the Department at the Olympia Service Center.
- ☐ 20. A surety bond in the amount of _____ written by a surety company authorized to do business in the State of Washington shall be furnished to ensure compliance with any and all of the terms and conditions of this permit and shall remain in force until all work under this permit has been completed and approved by the Department.
- ☐ 21. Relative to advertising adjacent to all State highways, we wish to call your attention to the Sceni Vistas Act of 1971, Chapter 47.42 RCW and State Transportation Commission ruling Chapter 468-66 WAC. Violation of this section of the statutes will be sufficient cause for cancellation of this permit. On-premise signs are allowed.
- ☐ 22. The Permit Holder shall notify the Department's representative upon completion of the work under this permit so that a final inspection can be made.
- ☒ 23. The responsibility of the Permit Holder for proper performance, safe conduct, and adequate policing and supervision of the project shall not be lessened or otherwise affected by Department approval of plans, specifications, or work, or by the presence at the work site of Department representatives, or by compliance by the Grantee with any requests or recommendations made by such representatives.
- ☒ 24. All material and workmanship shall conform to the Washington State Department of Transportation Standard Specifications for Road, Bridge and Municipal Construction, current edition, and amendments thereto, and shall be subject to inspection by the Department.



Search Options

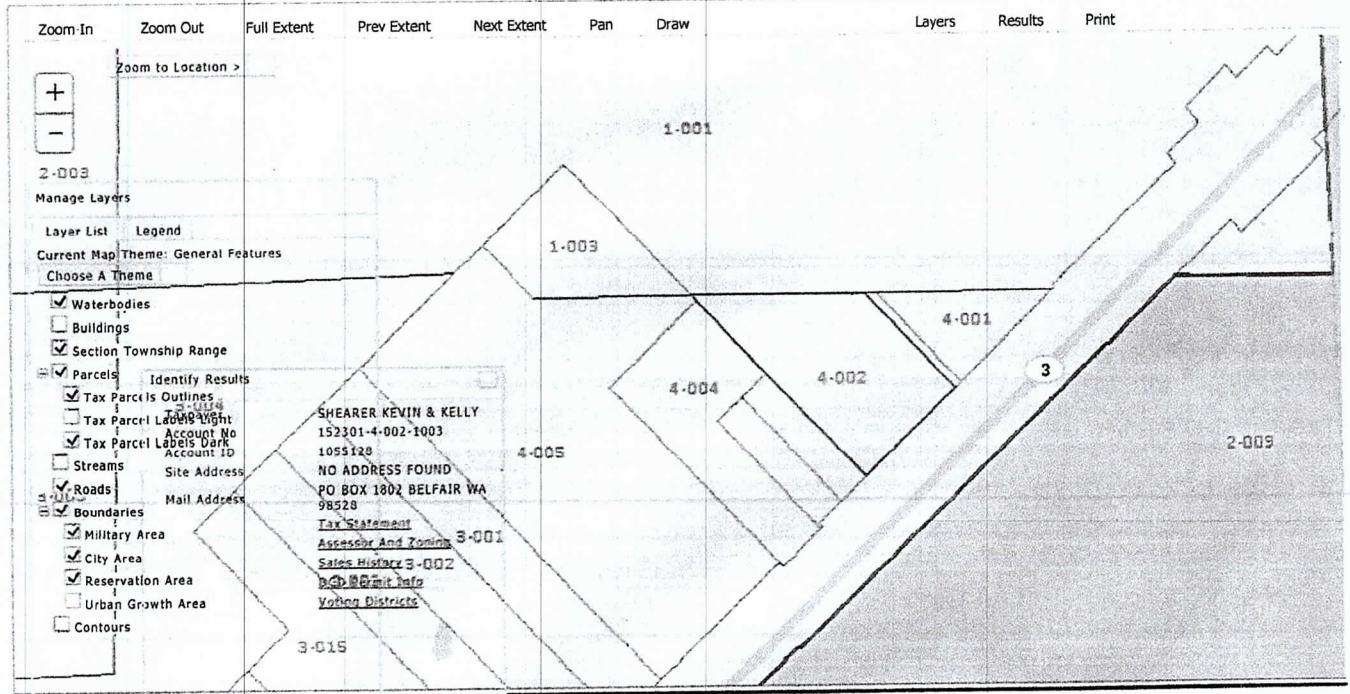
- ☒ Parcel No
☐ Site Address
☐ Mail Address

Parcel Search

152301-4-002-1003

Show results in a table, not the map.

Map Scale: 1 : 4,800

EXHIBIT B[Contact GIS](#) [Disclaimer](#) [Help](#)

Details for Permit WAR303253

Permit Number: WAR303253

Permit Version: 3

Facility/Site: Shearer Residence

Issued Date: 11/18/2020

Bremerton, WA 98367

Effective Date: 1/1/2021

Permittee /
Legal Responsible Party: Kevin Shearer

Last Modification Effective Date: 9/30/2024

Permit Type: Construction SW GP

Expiration Date: 12/31/2025

Permit Status: Active

Inactive Date:

The people below have access to this permit:

First Name	Last Name	Role	Approval Status	Last Login
KEVIN	SHEARER	Facility Signer		10/18/2024

[Close](#)



**KITSAP
ENVIRONMENTAL
COALITION**

October 24, 2024

TO: Kitsap Board of County Commissioners

FROM: Kitsap Environmental Coalition Board

RE: Comments on Kitsap County 2024 Comprehensive Plan Update and Related Regulations

Kitsap County is promoted as the natural side of the Puget Sound. Nature and a mix of rural areas, small towns, and urban areas define Kitsap County. But we are at a tipping point: we can take action to preserve that balance, or we can slide toward becoming just another suburb. The Comprehensive Plan Update is our one and only opportunity to preserve what makes Kitsap County special—because what we lose now can never be brought back.

The purpose of the Kitsap Environmental Coalition (KEC) is to advocate and educate about the natural world, which we are all dependent on for our very lives. The Board of KEC thanks you for the new vision for the County in the Comprehensive Plan Update, which calls for an *engaged, connected, safe, healthy, livable, resilient, vibrant, and well-governed* community. We support this vision and your selection of Preferred Alternative 2.

Below, the Board of KEC makes five requests as you approve the 2024 Comprehensive Plan Update and related regulations.

1. **Add *Natural Character* to the 2025 *Year of the Rural* focus:** We are pleased that the County did not rezone in rural areas this year and plans to address both rural rezoning and farmland issues in 2025. Please expand the 2025 focus to include attention to nature as a whole. This will make significant strides in protecting our environment in both rural and urban areas.

In 2024, progress was made in addressing changes to the Critical Areas Ordinance and introducing a Tree Canopy regulation. However, in their current form, these regulations do not adequately represent the importance of the tree canopy nor adequately address protection of nature. The lack of completion of the PROS plan in 2024 with attention to protection of nature is also of concern. We recommend that the 2024 Comp Plan Update specifically state that in 2025, these documents are expected to be further reviewed to give greater attention to protecting nature.

We must preserve and protect our most valuable assets—our forests, critical areas, and water supply—to develop climate resilience and a sustainable future for our residents. Rural Kitsap and open spaces are not just “vacant undeveloped lands.” They have definable qualitative and quantitative value to the residents of Kitsap County, and once gone, cannot

be replaced. They are the habitat of many species, provide essential ecological functions that support the whole county and its residents, and contribute to the quality of life and defining character of Kitsap County.

2. **Require use of Best Available Science:** For the past 15 months, KEC has warned the county leaders about DCD's disregard for Best Available Science. We are not alone. The WA Department of Fish and Wildlife (WDFW) has also presented their concerns and clearly states that DCD is disregarding Best Available Science and WDFW's recommendations. (ref: messages 520-526 on the Matrix of Comments on the FEIS)
3. **Prioritize the needs of existing residents and their future generations while attending to the protection of nature:** The 2024 Comp Plan Update and Preferred Alternative call for addressing both the expected population increase and the need for more diverse housing. More diverse housing is in contrast to the momentum of the past that has created a pipeline of single-family housing that is not affordable to the majority of current Kitsap residents. Priority should be given to the people who already live here by providing housing that is both attractive and affordable within urban areas before vesting more single-family high-end developments. Developers should not be granted extensions under old codes, given variances, or given a nearly automatic Determination of Non-Significance (DNS). These actions undermine our natural environment.

Kitsap County will grow, and we acknowledge the need to accommodate that growth. But we're asking you to ensure that growth is managed in a way that protects nature, preserves our balance of natural, rural, and urban areas—and puts the needs of our current residents first.

4. **Meet transportation Level of Service standards and resident needs:** WSDOT has identified shortcomings in Kitsap County's transportation Level of Service (LOS) standards. If left unmitigated, these shortcomings will create serious traffic problems within the County. It is imperative to resolve these issues. Prioritize the development of dependable public transit and infrastructure for non-motorized transportation, including shared-use paths in urban areas and bike lanes, over projects designed to encourage tourism.
5. **Align resource allocations with Preferred Alternative, including protection of nature:** Allocate County resources to prioritize the protection of nature and the Preferred Alternative 2. End previously approved projects of the past if they do not reflect those new priorities and current financial realities. Free up resources to deal with new priorities.

The new directions identified in the 2024 Comprehensive Plan Update and related regulations will require a more transparent County government that engages with and responds to the public and public-serving organizations. The Kitsap Environmental Coalition is ready to support this direction for our shared future.

KEC Board members:

David Onstad, Martha Burke, Paul Larson, Dave Shorett, Beverly Parsons



October 25, 2024

Mr. Scott Diener
Kitsap County Planning and Environmental Programs Manager
614 Division Street, MS-36
Port Orchard, WA 98366
Sent via email to: compplan@kitsap.gov

Dear Mr. Diener:

The Washington State Department of Transportation (WSDOT) Olympic Region appreciates the opportunity to review and comment on Kitsap County's (County) Final Comprehensive Plan (Plan) and the Final Environmental Impact Statement (FEIS).

WSDOT acknowledges the County's substantial effort to address housing, climate change, and resilience. WSDOT shares the County's vision to support alternatives that endorse growth in areas that are already near public transportation and multimodal options (Housing Policy 1.1). WSDOT commends the County on proactively including Complete Streets and the Climate Change Element. WSDOT is pleased to see goals, policies, and investments set forth in the Plan that support continued development of a multimodal transportation system.

However, WSDOT has continuing technical concerns related to the Plan and FEIS, including the Transportation Element, associated elements, and the Capital Facilities Plan.

Level of Service (LOS) Standard and Concurrency Management

WSDOT is still concerned with the County's area-based approach that allows the LOS standard to be exceeded by up to 15 percent of county roadway mileage. WSDOT's opinion as a subject matter expert is that any exceedance of an LOS standard on a county road, if left unmitigated, has the potential to create a probable significant adverse impact to the state highway system. WSDOT once again notes that while Ordinance 20.04 may authorize use of the area-based approach for project-level concurrency determinations after Plan adoption, the Ordinance does not authorize this approach as a SEPA significance criteria for the Plan update. WSDOT believes this approach is inconsistent with RCW 36.70A.070(6)(a)(iii)(D), which requires, "Specific actions and requirements for bringing into compliance transportation facilities or services that are below an established multimodal level of service standard."

Phased Review

While WSDOT understands the County's intent with a phased review approach, WSDOT remains concerned with the deferment of any investigation and mitigation of probable significant adverse environmental impacts given recent statutory changes related to middle housing streamlining and expanded State Environmental Policy Act (SEPA) categorical exemptions. Given the County's adoption of a phased review process, WSDOT will not view the non-project FEIS analysis as sufficiently meeting the "environmental analysis" requirements for SEPA Categorical Exemptions on housing streamlining (RCW 43.21C.229(3)(b)) or any other situation in which WSDOT has statutory review or approval authority.

Thank you again for the opportunity to review the County's Plan and FEIS. We look forward to continuing our productive partnership.

Sincerely,



George Mazur, P.E.
WSDOT Olympic Region Multimodal Planning Manager

GM:cm

cc: Nathan Pate, Washington State Department of Commerce
Maggie Moore, Puget Sound Regional Council
Manuel Abarca, WSDOT Olympic Region Traffic Design Engineer
Andrew Larsen, WSDOT Olympic Region Development Services
Teri Chang, WSDOT Multimodal Planning and Data Division



Community Heart&Soul® Overview

Community Heart & Soul is a resident-driven process that engages the entire population of a town in identifying what they love most about their community, what future they want for it, and how to achieve it.

Founded by Lyman Orton, Proprietor The Vermont Country Store

Developed and field-tested over a decade in partnership with over 90 small cities and towns across the United States, Community Heart & Soul is a proven process for engaging a community in shaping its future.

Based on three powerful principles – **involve everyone, focus on what matters most, and play the long game** – Community Heart & Soul helps towns move toward a brighter, more prosperous future by bringing community residents closer together.

When residents get closer, differences fade and the things they care most about replace the differences. Trust is built and residents become stronger believers in their communities and more collaborative in their decision-making. People continue to stay in their communities, new people move in, and investment in towns increases.

Community Heart & Soul is unique in how it engages residents. It is a highly inclusive process that reaches deep into communities to ensure all voices are represented in determining a town's future. Instead of bringing residents to the table, Community Heart & Soul brings the table to residents at community events, neighborhood block parties, schools, businesses, and virtual gatherings.

Heart & Soul communities experience a range of social and economic benefits:

- Pride and confidence grow in the town
- Civility and respect increase
- Residents feel more connected to one another
- Volunteerism increases
- New young leaders emerge
- More residents run for local office
- Economic conditions improve
- Investment in the town increases
- New local businesses open
- Town officials gain a deeper understanding of what matters to residents
- Towns are better prepared to respond to emergency situations



Galesburg Heart & Soul, Illinois

How Community Heart & Soul Works

Community Heart & Soul begins with a four-phase, step-by-step process that brings residents together to identify and honor the unique character of their town and the emotional connection of the people who live there.

Phase 1: Imagine

Heart & Soul teams are formed to build awareness, interest, and commitment in all segments of the community.

Phase 3: Plan

Residents develop action plans to guide future town planning based on their Heart & Soul Statements.

Phase 2: Connect

Stories are gathered from residents, leading to the development of Heart & Soul Statements that identify what matters most and reflect what they love about their towns.

Phase 4: Act

Heart & Soul Statements are officially adopted by town and city councils, incorporated into comprehensive and other plans, and are used to guide future policies and decisions.

NOW, THEREFORE, BE IT HEREBY RESOLVED BY THE CITY COUNCIL, AS FOLLOWS:

That the City of Rockland approves and adopts the following Rockland Heart & Soul Community Statements and commits to using them to evaluate decisions regarding future policy, strategic plans, operational issues, and community investment; that the City Council advises the City Manager to use the Community Statements in evaluating and recommending policy decisions or operational improvements in the City; and that in utilizing these Statements, it is understood that the City may weigh and apply them according to prevailing context and circumstance.



Playing the Long Game

The real work of Community Heart & Soul begins upon completion of the four phases. Heart & Soul is an ongoing practice that provides municipal officials with a clear understanding of what matters most to residents and forges a partnership that builds on what everyone has in common: **they all live here.**

Heart & Soul Statements, like these from the city of Rockland, Maine are posted in town offices and memorialized in resolutions to remind town officials about what matters most to residents and the future they want for their communities.

About Community Heart & Soul

The seed for Community Heart & Soul was planted by businessman, Lyman Orton, who, with his three sons, is the proprietor of The Vermont Country Store. Orton served on his town's Planning Commission when it was wrestling with divisive proposals and grew frustrated that decisions being made that would shape the town's future were without guidance from the majority of the residents.

Orton recognized that there had to be a better way—one that reflected the hopes, dreams and ideas of the entire community and not just the few who regularly attended Planning Commission meetings.

Funded through profits from The Vermont Country Store, Orton created a nonprofit organization with the mission of establishing a community development process that engages all voices within a community in determining what matters most to the people who live there, and using their ideas and aspirations as the blueprint for future decision-making.



Community Heart & Soul®



How To Create Stronger, Healthier and More Vibrant Small Cities and Towns





We Believe in Your Community

I grew up in Weston, Vermont, population 600, and served on the Planning Commission many years ago.

I observed most residents didn't get involved in town affairs until something controversial came along. We on the

Planning Commission updated the Town Plan, a nearly year-long process where we invited public participation which was scant.

Hardly a year had passed when a developer proposed an "educational center" five miles north of town on the upper side of a mountain. In actuality, it turned out to be an amusement park with numerous rides and the added attraction of an African animal park and was called Wildlife Wonderland.

The town became divided over it. Friendships were strained, enemies created, legal challenges exchanged, and an air of unpleasantness hung over the town.

An appeal resulted in exchanging the wildlife animals with farm animals. The theme park opened in the spring and went bankrupt in October. The scars on the mountain healed faster than the scars among the residents.

This troubled me for years and over time **Community Heart & Soul emerged as a better way for small cities and towns to make decisions about their future.**

Community Heart & Soul is premised on the notion that all small cities and towns have a distinct Heart & Soul. It's those elements that residents love about their town, the pride they feel, the places they love and show visitors, the gathering places, and a way of doing business that rises above political ideologies and views residents as friends and neighbors who will work together.

And it's led by all residents in partnership with their elected and appointed officials.



Small cities and towns have faced numerous challenges since WWII chasing the silver-bullet approach to economic development. You know, get a factory to move to town and the problems are solved. Didn't work out so well.

With Heart & Soul, towns get their confidence back and when that happens people do amazing things and economic development emerges more from within. You will see some examples in the pages that follow.



After an initial two years of learning, your town's Heart & Soul becomes an ongoing practice for years to come. It does not sit on a shelf. There are a growing number of Heart & Soul towns and lines of exchange of ideas among them are being established.

As most Heart & Soul towns say, this was the greatest investment we ever made and it's paying off with new energy, an amazing increase in the number of volunteers, more individuals running for office, and pride in rebuilding our own economy.

Lyman Orton

Founder, Community Heart & Soul

Proprietor, The Vermont Country Store

“With Heart & Soul, towns get their confidence back and when that happens **people do amazing things and economic development emerges.**”





Every Town Has a Heart and Soul That Reflects What Residents Love About Their Community and Why They Choose to Live There

Community Heart & Soul is a resident-driven process that engages the entire population of a town in identifying what they love most about their community, what future they want for it, and how to achieve it. **Organized into four phases, the step-by-step process is led by a Certified Coach who guides a community through the Heart & Soul process.**

Community Heart & Soul is the foundation upon which a town produces long-lasting benefits that live on, long term...in the heartbeat of your community. **Community Heart & Soul is a practice, adopted by each town that continues long into the future.** A town's Heart & Soul connects the human elements of residents with the governance elements of elected and appointed officials.



Three powerful principles guide the Heart & Soul model:

Involve Everyone

Hearing from all residents, especially those whose voices are hidden or missing, is a priority throughout the Community Heart & Soul process.

Focus on What Matters Most

When residents share what they love about where they live and identify their hopes for the future, common themes emerge. These are the things that matter most to residents and become the foundation for sound decision-making.



Play the Long Game

Community Heart & Soul is just the beginning of an evolutionary way towns view themselves, how they govern, and how they make decisions about the future. Communities are equipped for the long run with the skills and tools to continue doing business guided by what matters most—their community's Heart & Soul.

Community Heart & Soul reaches deep into communities to ensure all voices are represented in determining a town's future.

Instead of bringing residents to the table, Community Heart & Soul brings the table to residents at community events, neighborhood block parties, schools, businesses, and virtual gatherings.



Heart & Soul Communities Experience a Range of Social and Economic Benefits

Here are just a few of the many ways communities are revitalized by Community Heart & Soul.

Pride and confidence grow in the town

From the start, The Heart & Soul Team in McComb, Ohio, (pop. 1,600) was on the move, reaching out to as many residents as possible, marching in the town's celebrated Cookie Festival parade, connecting with locals at the fire department chicken BBQ, and meeting fans at high school sports games, among other events.

One resident observed a positive impact right away: "You know what I love about Heart & Soul? People feel they can be proud of McComb. I've already seen so much good. And it's just the start." Asking people what they love about McComb got people thinking about their town's assets and possibilities. This rekindled a sense of pride.

Learn more: www.communityheartandsoul.org/towns/mccomb-ohio



McComb Region Heart & Soul, Ohio

Volunteerism increases

In Gardiner, Maine, (pop. 5,700) city council meetings were characterized by a few angry residents showing up to yell and complain. Community Heart & Soul got residents reconnected to their local government. Interest in serving on committees grew. More people attended council meetings. The tenor of meetings changed as discourse became more civil. The mayor reported a hundredfold increase in active volunteers.

Learn more: www.communityheartandsoul.org/towns/gardiner-maine



Gardiner Heart & Soul, Maine

Town officials gain a deeper understanding of what matters to residents

In Cortez, Colorado, (pop. 9,000) city planners wanted to get more residents involved, especially those missing voices rarely heard. City officials began to think beyond city hall as the only place for public meetings. Using the Community Network Analysis, volunteers and planners went to people in their neighborhoods and sponsored block parties and potluck dinners.

As plans for the future took shape, they went back to residents to check their work. Community engagement helped planners do their jobs. It also strengthened bonds among neighbors based on a shared love of place and the desire to make it better.

Learn more: www.communityheartandsoul.org/towns/cortez-colorado



Cortez Heart & Soul, Colorado



Biddeford Heart & Soul, Maine

Investment in the town increases

Biddeford, Maine, (pop. 21,000) was known as "Trash Town" because of the industrial garbage incinerator right downtown. But the facility provided 80 jobs and was the largest taxpayer in a town without a lot of options. Engagement activities during Biddeford's Community Heart & Soul project made it clear that residents wanted the incinerator gone.

That gave officials the backing they needed to buy the facility and close it. The move triggered major reinvestment with more than 90 new businesses and \$90 million invested in the first seven years after Heart & Soul, including a \$50 million boutique hotel and \$15 million in affordable housing.

Learn more: www.communityheartandsoul.org/towns/biddeford-maine

Residents honor the importance of history and culture

The Greater Carlisle Heart & Soul Team in Pennsylvania (pop. 19,000) heard from a resident about a long abandoned African-American church built by her grandfather circa 1870. The story rallied the community to protect and preserve the church along with the nearby cemetery, where her grandfather's gravesite is located along with several Civil War veterans. Now, the site is on the National Register of Historic Places and a door has been opened to dialogue about the African-American history in the community.

Learn more: www.communityheartandsoul.org/towns/greater-carlisle-pennsylvania



Greater Carlisle Heart & Soul, Pennsylvania



See more examples of how towns benefit from Community Heart & Soul:
www.communityheartandsoul.org/community-heart-soul-towns

How Community Heart & Soul Works



Developed and field-tested in partnership with over 100 small cities and towns across the United States, **Community Heart & Soul is a proven process for engaging residents in shaping the future of their community.** For most communities, completing the four phases of Community Heart & Soul takes about two years. But completion of the Heart & Soul process is really just the beginning. That’s because Community Heart & Soul is an ongoing practice that provides municipal officials with a clear understanding of what matters most to their constituents—all the residents—and forges a partnership that builds on the first thing everyone has in common: they all live here.

Four Phases of Community Heart & Soul

Phase 1: Imagine

Approx. 2-3 months: In Phase 1, you will gather partners and a diverse team of volunteers. Together, you will use your collective hopes for the future to set goals and build awareness, interest and commitment across the community. This is also an important time to identify who lives, works, and plays in the community and to develop a communications plan to reach them all.



Community Network Analysis

The Community Network Analysis is a guiding tool throughout Community Heart & Soul. **The Community Network Analysis is about understanding who lives, works, and plays in your community and how best to reach them.** It begins by analyzing community demographics and tapping local knowledge to brainstorm ways to engage different groups and networks. This is used throughout the process to ensure the work involves everyone.



Golden Heart & Soul, Colorado

Phase 2: Connect

Approx. 6-8 months: Activities in Phase 2 focus on reaching a broad, diverse mix of people to identify what matters most to your community. Gathering and sharing personal stories about local experiences is a key engagement strategy in this phase, bringing people together to find common ground. This phase ends in articulating that common ground in Heart & Soul Statements, which guide activities and drive results in Phases 3 and 4.



Heart & Soul Statements

Here is a sampling of Heart & Soul Statements drawn from towns across the country.

“We treasure a vibrant downtown with **small businesses, festivals, parades, waterfront, and art-related opportunities** that provide economic development and places for people to gather; promoting a rich, welcoming sense of community.”

“We appreciate a local community that **celebrates and accepts all of the differences** among individuals that keep our town vibrant and culturally beautiful.”

“Our city government is **responsive, approachable, good at listening**, welcomes participation and involvement, is fair to all parts of the city and is accountable.”



See more Heart & Soul Statements:
www.communityheartandsoul.org/phase-two



Phase 3: Plan

Approx. 4-6 months: In Phase 3, your community's Heart & Soul Statements provide a framework for gathering and prioritizing ideas for action. Again, include as many people as possible as you discuss and make decisions for your community's future. You will also begin to plan for the long-term practice of Community Heart & Soul.



Madison County Heart & Soul, Iowa

Action Plans

As Bucksport Heart & Soul in Maine completed Phase 3, team leaders wanted to get the ball rolling on ideas prioritized by the community that ranged from **creating a downtown beautification program, to holding block parties, to developing a farm-to-school program.** The team began by signing on organizations, soliciting support from the library, the chamber of commerce, the local land trust, the garden club, and so on.

Next, they held the Bucksport Heart & Soul Summit and Volunteer Fair. **Sixteen organizations that adopted Heart & Soul action items set up displays about their action ideas and signed up volunteers on the spot.** Among the outcomes: a storybook trail on the waterfront walking path, new benches going up on Main Street, and an increase in the number of volunteers, from 30 to 400, who participated in the town's annual spring cleanup day.

Bucksport Heart & Soul, Maine



Phase 4: Act

Ongoing, starting after Phase 3: In Phase 4, you will begin the ongoing practice of Heart & Soul, focusing on the transition to sustained long-term implementation. Your town makes policy decisions, and people and organizations work together to implement town's Action Plan and uphold your Heart & Soul Statements.

Ongoing Practice of Community Heart & Soul

The Madison County, Iowa Heart & Soul team developed an inspirational video highlighting the work of Community Heart & Soul. The video serves as an **inspirational springboard and is supporting decision-makers in using Heart & Soul data to take action.** Heart & Soul Statements have been integrated into the Covered Bridges Scenic Byway Corridor Management Plan. The Madison County Heart & Soul website has tools for action planning with specific examples of actions that are utilizing Heart & Soul Statements.



Hear from the Bucksport Town Manager:
www.youtube.com/watch?v=EJQ8Ue_oqUg



Watch the Madison County video:
www.youtube.com/watch?v=xax68CQwfeI

Resources Needed To Join Community Heart & Soul

Over many years we have invested heavily in developing Community Heart & Soul, tested and deployed it in over 100 communities, learned from what worked and what didn't, tracked the long-term successes and positive impacts, trained coaches and staff of our partners, developed networks among Heart & Soul towns, and now we are ready to expand across the country with your help.

If we were a private consulting business we would be out selling our content and services for lots of money. But we're not. We are a 501(c)3 not-for-profit organization that I have funded from my family's business, The Vermont Country Store. We give away our intellectual property. We pay a staff to develop that. We have created a highly valuable practice for small cities and towns to operate and function through resident

“This is the best investment we ever made in our community.”



engagement. The feedback we get from practicing towns is “this is the best investment we ever made in our community.”

It's not totally free. Your town will need to invest. You will need to put skin in the game. That is a powerful incentive to continue the long-term practice of Community Heart & Soul in your town and with that the rewards will emerge.

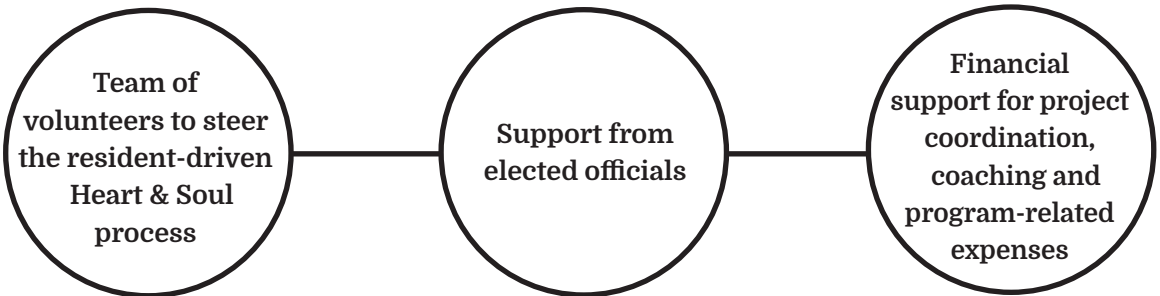
I invite you to join the expanding network of Heart & Soul towns and all it has to offer your town.

Lyman Orton

Resources Provided by Community Heart & Soul



Resources Provided by Towns



Get Started Now!

Community Heart & Soul is about rolling up your sleeves, getting active, and doing things. **With that in mind, here are 4 things you can do to get going right away.**



Apply for a \$10,000 Community Heart & Soul Seed Grant! For a limited time, we are offering Seed Grants to help communities with startup funding for Community Heart & Soul. **Complete details are available at:**
www.communityheartandsoul.org/seed-grants

Watch inspiring videos and read town profiles:
www.communityheartandsoul.org



Download our “Community Heart & Soul Overview”:
<https://bit.ly/chs-overview>

— Community —
Heart & Soul

Email us at info@communityheartandsoul.org or call us at **802.495.0864**. We'll be happy to help you with next steps. There's no better time to start than **NOW**. Let us know how we can help!

www.communityheartandsoul.org

120 Graham Way, Suite 126
Shelburne, VT 05482

From: [April Ryan](#)
To: [Christine Rolfes](#); [Charlotte Garrido](#); [Katie Walters](#); [Comp Plan](#)
Cc: [April E Ryan](#)
Subject: Comment on Comprehensive Plan Update
Date: Sunday, October 27, 2024 9:53:19 PM

You don't often get email from aprilryan@mac.com. [Learn why this is important](#)

[CAUTION: This message originated outside of the Kitsap County mail system. **DO NOT CLICK on links or open attachments** unless you were expecting this email. If the email looks suspicious, contact the Helpdesk immediately at 360-337-5555, or email at Helpdesk@kitsap.gov]

Dear Commissioners,

I gratefully chose to live in Kitsap County because of its abundant wildlife, natural beauty and rural character of the countryside and small town charm of the community. And when the Kingston Village Green Community Center was completed, creating a much needed gathering place, I was heartened that individuals matter here (like the Martins, who worked hard to get it built), and are engaged in shaping our communities' growth in a meaningful way. I'm thankful too, for a county governance that values its citizens' participation in creating its own future.

But I am concerned that we have not done enough to protect the environment in our previous county planning, and with the recent explosion of development and even more projected growth, we are in serious jeopardy of losing what is both vital and irreplaceable. We must work together to create a future that benefits all who live here.

Let's start by preserving our rural and natural areas, preventing suburban sprawl, and concentrating growth in the urban areas, just as intended by Preferred Alternative 2. Hold strong on not up-zoning rural areas, don't create variances for special interests, even if they are powerful national corporations or backed by foreign investors. Their interests are short term profits - moving on to the next building site like an industrial machine on repeat. But we, the citizens, live with the consequences of a developer who has since moved on - impacting the quality of our families' lives and our lifetime home investments.

- **Please expand the 2025 focus to include attention to nature as an interconnected system that must be kept whole to provide the climate resilience we now know to be critical to our survival.** In 2024, some progress was made in strengthening the Critical Areas Ordinance and introducing a Tree Canopy regulation. However, in their current form, they the word "may" has replaced "must" making certain regulations unenforceable, and therefore ineffective. If we are serious about preventing excessive heat fluctuations and water shortage for public and ecologic health, our tree canopies are our most effective tool. Which we already have - we just need to preserve it them. Instead, a policy of clearing mature trees and replacing with seedlings is not

scientifically credible, is irresponsible and wrecks longterm harm we can not afford. Moreover, the lack of completion of the PROS plan in 2024 with attention to protecting nature is also of concern. This must be addressed and further evaluated in 2025.

We must preserve and protect our most valuable assets—our forests, critical areas, and water supply—to develop climate resilience and a sustainable future for our residents. Rural Kitsap and open spaces are not just “vacant undeveloped lands.” They have definable qualitative and quantitative value to the residents of Kitsap County, and once gone, cannot be replaced. They are the habitat of many species, provide essential ecological functions that support the whole county and its residents, and contribute to the quality of life and defining character of Kitsap County. It is not simply a matter of nature being picturesque, it means we have healthy streams, providing enough salmon to support a thriving economy. Our natural utilities, like watersheds recharging our aquifers, supply our public water. Our forests sequester carbon, clean our air, temper our climate, and provide habitat for the interdependent food chain we often take for granted.

- **Require use of Best Available Science:** Data and the knowledge it enables is readily available to make well-informed decisions. It is irresponsible to ignore what is both available and broadly known by the publicly educated. The WA Department of Fish and Wildlife (WDFW) has also presented their concerns and clearly states that our Department of Community Development is disregarding Best Available Science and WDFW’s recommendations. (ref: messages 520-526 on the Matrix of Comments on the FEIS). We can not afford to lag behind the times in a Comprehensive Plan that looks ahead twenty years.

- **Prioritize the needs of existing residents and their future generations while attending to the protection of nature:** The 2024 Comp Plan Update and Preferred Alternative call for addressing both the expected population increase and the need for more diverse housing. This is a significant change from the past that has created a profitable pipeline for builders of single-family housing, but is not affordable to the majority of current Kitsap residents. To accomplish this progressive change, priority should be given to current residents by providing housing that is attractive, affordable, and well-connected, within urban areas before vesting more single-family high-end developments. Requiring Low Impact Development standards not only in stormwater management, but in overall “green” building design will help ensure all buildings and developments work with environmental functions, not against them, and are sustainable long term.

- **Meet Level of Service Standards (LOS) and resident needs:** It is clear from our increasing traffic gridlock, that our transportation infrastructure has not kept pace with expanding development. Kitsap County’s inadequate LOS has even caught the attention of the WSDOT. If left unmitigated, these shortcomings will multiply serious traffic problems within the County. It is imperative to resolve these issues. Prioritize the development of dependable public transit and infrastructure for non-motorized

transportation, including shared-use paths in urban areas and bike lanes, over projects designed to encourage tourism. Frankly we must first attend to the basics of getting residents to work, school, shopping, and healthcare safely. Affordable housing means little if there is no public transportation to make living there viable. Consider the whole lifestyle ecosystem of a community not just separate parts.

- **Base the County Budget on the Preferred Alternative, which includes the protection of nature:** End projects of the past if they don't reflect those new priorities and current financial realities. Free up resources to deal with new priorities.

This is obviously a serious challenge – keeping everything balanced while making crucial changes, but I look forward with optimism to the County's implementation of its new vision, putting the smarter, more equitable, and sustainable planning intent into action.

Thank you for your service, dedication to our community, and careful consideration of our shared futures.

April Ryan, Kingston resident



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October 28, 2024

Department of Community Development
Planning and Environmental Programs
614 Division Street MS-36
Port Orchard, WA 98366
compplan@kitsap.gov

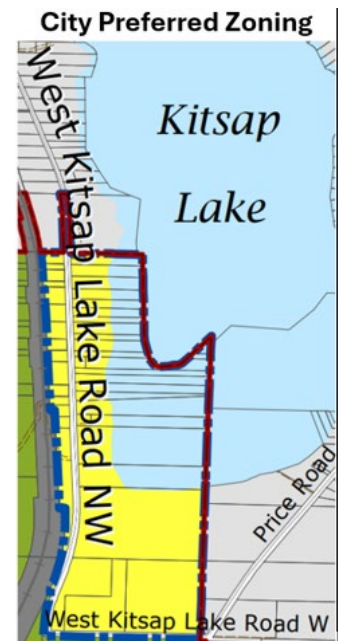
RE: 10.28.2024 Board of Commissioner Public Hearing

Kitsap County Board of Commissioners,

Thank you for considering City comments on the Kitsap County 2024 Comprehensive Plan update with the October 28th Public Hearing. The City appreciates County collaboration received with this update process, and requests County Commissioners strongly consider the points provided in this comment letter in their final decision-making.

1. Remaining points of interest. County Commissioners have relayed that they would further consider the following items related to the West Bremerton UGA (WB-UGA) prior to final adoption of the Comprehensive Plan.

- Restore Property UGA Inclusion. Published Kitsap County Draft Environmental Impact Statement (DEIS) alternatives illustrated two parcels (202401-2-003-2006 & 202401-2-002-2007) within the proposed WB-UGA inclusion area, however, the published Preferred Alternative removed these two parcels. At the July 1, 2024 Kitsap County Commissioner meeting, Commissioners appeared receptive to restoring these parcels to WB-UGA inclusion. County Staff noted at the meeting that, as these two parcels presented such a minor impact, Commissioners could restore these parcels back into the WB-UGA at the end of the process. As these parcels are heavily encumbered with critical areas, development potential is extremely limited. Including these parcels within the WB-UGA would create a logical border that would benefit road maintenance activities, potential first-responders, and citizen understanding of future City/County jurisdictional limits.
- Urban Low Zoning. Published Kitsap County DEIS alternatives illustrated all properties within the west Kitsap Lake WB-UGA inclusion area as zoned Urban Low (UL), however, the preferred alternative altered this zoning to include the *Park* designation. At the July 1, 2024 Kitsap County Commissioner meeting, Commissioners noted the City request for this zoning. Due to public ownership, and critical area encumbrances, County Staff recognize that these areas have little to no potential for development. As the City has no corresponding zoning designation to County *Park* designation, when annexed by the City in the future, these areas would receive City zoning of Low Density Residential. As the County Urban Low zone is equivalent to the City Low Density Residential



zone, all areas within the west Kitsap Lake WB-UGA should retain the UL designation. As the vast majority of lands with the *Park* designation are City of Bremerton property, deference on City preferred zoning should be considered.

2. *Review Areas of Agreement.* County Commissioners have previously considered City requests noted in the following comment letters: *Reclassification & Change Request* (9/16/2022), *SEPA EIS Scoping Comments* (12/8/2022), *Land Use Alternatives* (4/14/2023), and *Draft Environmental Impact Statement Alternatives* (2/26/2024). The following items review content from previous comment letters, and provides additional information supporting City Comprehensive Plan requests.

- *Kitsap Public Health District Support (6/26/2024).* KPHD provided Kitsap County with a letter supporting proposed WB-UGA inclusion areas. KPHD Environmental Health Director John Kiess notes that sewer service in these areas would be beneficial, as replacing aging septic systems on existing lots would be difficult due to small lot sizes and environmental constraints. KPHD also notes City of Bremerton ongoing efforts to improve Kitsap Lake water quality could become more viable with increased lake management options available with WB-UGA inclusion.
- *Kitsap County Commissioner Meeting (7/1/2024).* Mayor Greg Wheeler, and City support Staff, directly engaged with County Commissioners on proposed WB-UGA inclusion areas at the July 2024 Commissioner meeting. Per previous County Commissioner request, the City presented a revised north Kitsap Lake WB-UGA boundary that was smaller in size than the initial boundary applied for with the September 2022 Reclassification Request. The City also requested restoring west Kitsap Lake parcels to WB-UGA inclusion that had been removed from the Preferred Alternative, as well as reinstating Urban Low zoning in this area. Commissioners appeared amenable to these requests, however, invited the City to perform additional outreach to persons residing in the proposed WB-UGA inclusion area. City and County representatives agreed that the City preferred WB-UGA proposal, and not the County identified Preferred Alternative, be presented at the future public meeting.
- *Kitsap Lake UGA Public Meeting (9/24/2024).* The City sent invitations via standard mail to residents in the proposed WB-UGA inclusion area, and performed an online meeting attended by Mayor Greg Wheeler, Commissioner Katie Walters, and supporting staff from the City and County. The City provided a full presentation of the City preferred WB-UGA proposal, followed by a question-and-answer period. The meeting was well attended and attendees were urged to send any comments they may have to compplan@kitsap.gov for Commissioner consideration.
- *Central Kitsap Urban Growth Area (CK-UGA).* The City of Bremerton requests Kitsap County associate the CK-UGA to the City of Bremerton with the current 2044 Comprehensive Plan update. The following is a brief review of supporting information previously provided to the County under separate comment letters. The City appreciates Kitsap County Commissioner efforts taken thus far to associate the CK-UGA to the City of Bremerton.

Washington State Directives. The State establishes that cities are the appropriate providers of urban services within Urban Growth Areas per WAC 365-196-310(2)(g) and RCW 36.70A110(4).

Growth Management Hearings Board (GMHB). The GMHB has made clear that cities should be the providers of urban services to UGAs and that the comprehensive plan update process is the appropriate time to plan for transference (*City of Spokane v. Spokane County, Case No. 06-1-0002* and *Abenroth, et al. v. Skagit Co., Case No. 97- 2-0060*).

Countywide Planning Policies (CPPs). Kitsap Regional Coordinating Council (KRCC) CPPs note that association of UGAs will occur with the comprehensive plan update process per CPP UGA-2(b) and that Kitsap jurisdictions encourage the incorporation of UGAs to cities per CPP CW-1(c).

Kitsap County Comprehensive Plan. Kitsap County's existing Comprehensive Plan Policy 25, states, “. . . Considering that the Central Kitsap Unincorporated Urban Growth Area is unassociated with a

city, work with the City of Bremerton on an agreement to associate the Central Kitsap Unincorporated Urban Growth Area."

City of Bremerton Comprehensive Plan. The *Eventual Growth Intent* section of the current Bremerton Comprehensive Plan establishes that the CK-UGA should be associated to the City of Bremerton.

Mason County Superior Court, Case No. 16-2-00695-1. A 2017 Settlement Agreement, signed by Kitsap County Commissioners and the Bremerton Mayor, concluded that the City of Bremerton may initiate annexation of properties within the CK-UGA.

Existing Wastewater Service. The City of Bremerton currently provides urban wastewater services to well over 150 properties within the CK-UGA. Mapping of these areas has previously been provided under a separate comment letter.

Existing Outside Utility Agreements. More than 800 properties throughout the CK-UGA have signed Outside Utility Agreements for annexation to the City of Bremerton. Agreements are recorded on property titles with the Kitsap County Auditor. Mapping of these areas has previously been provided under a separate comment letter.

- West Bremerton Urban Growth Area (WB-UGA). A limited expansion of the WB-UGA is requested with this comprehensive plan update process. Specific mapping is included in the original letter. The City appreciates Kitsap County Commissioner efforts taken thus far to expand the WB-UGA to accommodate City of Bremerton planning efforts.

Kitsap Lake (North). Existing sewer service has been provided within the requested UGA expansion area since the 1970s, accordingly, it is a clear error not to have included this geography when UGA boundaries were originally established. Per Growth Management Act (GMA) RCW 365-196-320(4)(c), Sewer systems are the only services that are generally exclusively for urban growth areas; granting the City request would bring this area into compliance with GMA. Existing development is largely urban in nature and includes several duplexes, an apartment building, and large manufactured home park. The City request is consistent with CPP UGA-3(i) for areas prioritized for UGA expansion. City utility professionals concluded that the proposed boundary would provide the City with the most logical service area based on the location of existing sewer and road network.

Kitsap Lake (West). This limited expansion would enable GMA conformance for two existing sewer properties currently located outside the WB-UGA and bring existing City owned properties into the WB-UGA for municipal purposes. To improve water quality, and avoid toxic levels of algae blooms, Bremerton invests significant funds annually to ensure water quality standards are maintained. Limited UGA expansion will enable lakeside properties the opportunity to further improve Kitsap Lake water quality by removing waterfront septic systems in favor for municipal sewer connection

Thank you for working with the City of Bremerton on resolving these matters during the current Comprehensive Plan update process. Should any additional information be required, please provide the City with specific information requests as soon as possible.

Garrett Jackson
Planning Manager
(360) 473 – 5289
345 6th Street, Suite 100
Bremerton, WA 98337

October 28, 2024

The Honorable Christine Rolfes
The Honorable Charlotte Garrido
The Honorable Katie Walters
Kitsap County Board of Commissioners
Kitsap County Commissioner's Office
614 Division St. MS - 4
Port Orchard, Washington 98366

Dear Commissioners Rolfes, Garrido, and Walters:

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

Sent via email to: compplan@kitsap.gov; Kitsapcommissioners@kitsap.gov

Thank you for the opportunity to comment on the Final Draft Kitsap County Comprehensive Plan 2024. Futurewise strongly supports the update and final draft. The final draft includes important fixes to address community concerns, regional policies, and state law. We have additional comments on the final draft below. We first summarize them and then provide more detailed recommendations in the following section.

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

Summary of our Comments

- Futurewise supports the Final Draft Kitsap County Comprehensive Plan 2024 without the proposed urban growth area expansions and with some additional features. This alternative is more likely to reduce greenhouse gas pollution, allow more affordable and middle-income housing, and to be affordable to taxpayers and ratepayers.
- Incorporate additional height and density increases within the existing urban growth areas to eliminate the need for UGA expansions and provide the capacity for the required number of affordable housing units. This will allow for more affordable housing and save taxpayers and ratepayers money. Please see page 3 of this letter for more information.

- The preferred alternative violates RCW 36.70A.070(2)(c) by failing to identify sufficient land for affordable housing. The changes proposed in the first bullet can bring the comprehensive plan into compliance with RCW 36.70A.070(2)(c). Please see page 5 of this letter for more information.
- The comprehensive plan should have stable urban growth areas consistent with VISION 2050. This will save taxpayers and ratepayers money and protect the environment. Please see page 5 of this letter for more information.
- The comprehensive plan must reduce greenhouse gas pollution consistent with VISION 2050. This will reduce adverse impacts on fish and wildlife habitat, flooding, and the environment. Please see page 7 of this letter for more information.
- Futurewise supports the Tree Canopy Requirements in the preferred alternative and in proposed Chapter 17.495 Kitsap County Code (KCC), Tree Canopy. Tree canopies reduce heat related deaths, reduce storm water runoff, allow for ground water recharge which supplies much of the County's drinking water, and protects salmon habitat. See page 10 of this letter for more information.
- The comprehensive plan needs to reduce rural growth rates over time to achieve the Regional Growth Strategy rural population growth target of eight percent of the county's total population growth. This will save taxpayers and ratepayers money, reduce adverse effects on the environment, and reduce the adverse impacts of natural hazards. Please see page 11 of this letter for more information.
- The comprehensive plan should not include rural comprehensive plan amendments or upzones that increase rural population and employment capacity. Again, this will save taxpayers and ratepayers money, reduce adverse effects on the environment, and reduce the adverse impacts of natural hazards. Please see page 13 of this letter for more information.
- Futurewise supports Land Use Goal 7, Historic, archaeological, and cultural resources, and the associated Land Use Policies and Strategies including Land Use Strategy 7.b. calling on the County to consider pre-ground disturbance site investigations for sites where the state predictive model show cultural resources are likely or when requested by affected Native American Tribes and Nations. This will protect cultural sites from damage and reduce the potential for costly shutdowns for developments. Futurewise also recommends adding a strategy to protect historic landscape scale cultural resources. Please see page 14 of this letter for more information.

- Futurewise supports the Environment Element in the Comprehensive Plan. It will help protect the environment that benefits the community and fish and wildlife.
- The Environment Goals, Policies and Strategies should limit impervious surfaces and forest clearing, particularly outside urban growth areas to protect salmon habitat. This will help with salmon and steelhead recovery. Please see page 15 of this letter for more information.
- Futurewise strongly supports including the Climate Change Element in the Comprehensive Plan. The climate element will help the County reduce the severity of climate change and address the adverse impacts. We recommend that Climate Change Policy 5.1 also protect historic culturally important landscapes from climate impacts. See page 16 of this letter for more information.
- Please adopt policies and regulations to direct growth away from the Wildland-Urban Interface (WUI) and to encourage and require implementation of the Firewise Principles. This will protect people and property from wildfire and reduce burdens on firefighters. Please see page 17 of this letter for more information.
- Designate agricultural lands of long-term commercial significance in the Comprehensive Plan. This will help protect an important economic sector and provide for locally grown food. Please see page 18 of this letter for more information.
- The Growth Management Act requires water quantity policies and regulations as part of the 2024 comprehensive plan and development regulations update. These provisions will help protect senior water rights holders and protect salmon and steelhead and aid in their recovery. Please see page 19 of this letter for more information.
- Do not require parking for residential and mixed-use developments near transit stops with good existing or planned transit service. This will help reduce housing costs and promote infill development. Please see page 21 of this letter for more information.

Detailed Comments

Incorporate additional density and height increases within the existing urban growth areas to eliminate the need for Urban Growth Area (UGA) expansions and to provide for more affordable housing.

The Southern Resident Orca Task Force's *Final Report and Recommendations* calls for Washington to "increase affordable housing and reduce urban sprawl by growing 'up instead of out.'"¹ We recommend that the comprehensive plan not expand urban growth areas and instead grow up.

Growing up can also provide for needed affordable housing. The *Final Report Housing Element Technical Analysis* documents that the preferred alternative has a deficit of 1,179 housing units for families and individuals earning 80 percent or less of the area median income (AMI).² The preferred alternative also has a deficit of 166 housing units for families and individuals earning between 80 and 120 percent of the AMI.³

Kitsap County has housing costs above the national average.⁴ The State of Washington Department of Commerce has documented that in higher-cost communities low- and mid-rise wood frame housing types are needed to provide housing affordable to families and individuals with incomes between 0 to 80 percent of the adjusted median income when subsidies are available.⁵ These housing types also provide housing affordable to families and individuals earning between 80 to 120 percent of the adjusted median income without subsidies.⁶ With subsidies, high-rise buildings are also affordable to families and individuals earning between 80 to 120 percent of the of the adjusted median income.⁷ Accessory dwelling units on existing lots can also provide housing for families and individuals earning 80 to 120 percent of the adjusted medium income in higher

¹ Southern Resident Orca Task Force, *Final Report and Recommendations* p. 107 (Nov. 2019) last accessed on Oct. 24, 2024, at: <https://www.orca.wa.gov/wp-content/uploads/TaskForceFinalReport-2019.pdf> and at the link on the last page of this letter with the filename: "TaskForceFinalReport-2019.pdf."

² Kitsap County Comprehensive Plan Appendix A - *Final Report Housing Element Technical Analysis* p. 17 (July 8, 2024) last accessed on Oct. 24, 2024, at: <https://www.kitsap.gov/dcd/PEP%20Documents/Comp%20Plan%20Appendix%20A.%20Housing%20Element%20Technical%20Analysis.pdf>.

³ *Id.*

⁴ Kitsap Economic Development Alliance, Cost of Living webpage last accessed on Oct. 24, 2024, at: <https://www.kitsapeda.org/lifestyle/cost-of-living#:~:text=Regional%20Cost%20of%20Living&text=The%20national%20average%20is%20normalized,likely%20attributed%20to%20ferry%20travel>. At the link on the last page of this letter with the filename: "Kitsap Economic Development Alliance Cost of Living.pdf."

⁵ Washington States Department of Commerce, Local Government Division Growth Management Services, *Guidance for Updating Your Housing Element: Updating your housing element to address new requirements* p. 33 (Aug. 2023) last accessed on Oct. 24, 2024, at: <https://deptofcommerce.app.box.com/s/1d9d517g509r389fomjpowh8isjpirlh> and at the link on the last page of this letter with the filename: "HB 1220_Book2_Housing Element Update_230823 Final_updated 240920.pdf."

⁶ *Id.*

⁷ *Id.*

cost communities.⁸ So planning and zoning for more low- and mid-rise wood frame housing capacity can close the affordable deficits. These upzones should be in existing cities and urban growth areas. They can also accommodate the housing need without expanding the urban growth areas.

The preferred alternative violates RCW 36.70A.070(2)(c) by failing to identify sufficient land for affordable housing.

RCW 36.70A.070(2)(c) requires the Kitsap County housing element, and the housing elements of the cities, to identify “sufficient capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, [and] permanent supportive housing” Using the State of Washington Department of Commerce Housing for All Planning Tool (HAPT) methodology, the population targets are converted to needed housing units by income category and beds for permanent supportive housing. The County must then identify the land with the zoning capacities needed to accommodate these housing units by income band or category.

The *Final Report Housing Element Technical Analysis* deficit of 1,179 housing units for families and individuals earning 80 percent or less of the area median income (AMI) and 166 housing units for families and individuals earning between 80 and 120 percent of the AMI show that the comprehensive plan update fails to comply with RCW 36.70A.070(2)(c).⁹ Planning and zoning for more low- and mid-rise wood frame housing capacity can close the affordable deficits. They can also accommodate the housing need without expanding the urban growth areas.

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

⁸ *Id.*

⁹ Kitsap County Comprehensive Plan Appendix A - *Final Report Housing Element Technical Analysis* p. 17 (July 8, 2024).

The amended Plan Map includes a net increase of 575 acres of land added to the urban growth areas.¹⁰ We understand and appreciate that many additions were not made to the urban growth areas.¹¹

However, “VISION 2050 calls for a stable and sustainable urban growth area into the future, thus any adjustments to the urban growth area [UGA] in the coming decades should continue to be minor. When adjustments to the urban growth area are considered, it will be important to avoid encroaching on important habitat and natural resource areas.”¹² MPP-RGS-5 provides “[e]nsure long-term stability and sustainability of the urban growth area consistent with the regional vision.”¹³ MPP-RGS-6 also provides: “Encourage efficient use of urban land by optimizing the development potential of existing urban lands and increasing density in the urban growth area in locations consistent with the Regional Growth Strategy.”¹⁴ Comprehensive plans must be consistent multicounty planning policies.¹⁵ Consistent with VISION 2050, we recommend that the adopted comprehensive plan not include urban growth area expansions.

The GMA requires urban growth areas and limits their size for many reasons. One of the most important is that compact urban growth areas (UGAs) save taxpayers and ratepayers money. In a study published in a peer reviewed journal, Carruthers and Ulfarsson analyzed urban areas throughout the United States including Kitsap County.¹⁶ They found that the per capita costs of most

¹⁰ Kitsap County Staff Report – 2024 Comprehensive Plan Periodic Update p. 8 of 12 (October 22, 2024) last accessed on Oct. 24, 2024, at: <https://www.kitsap.gov/dcd/PEP%20Documents/Comp%20Plan%20Draft%20Staff%20Report%20101424.pdf>.

¹¹ Kitsap County Staff Report – 2024 Comprehensive Plan Periodic Update Exhibit J: Reclassification Request Table 2024 Table pp. 3 – 5 last accessed on Oct. 24, 2024, at: <https://www.kitsap.gov/dcd/PEP%20Documents/20241022%20Reclassification%20Table.pdf>.

¹² Puget Sound Regional Council, *VISION 2050: A Plan for the Central Puget Sound Region* p. 43 (Oct. 2020).

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *West Seattle Defense Fund v. City of Seattle*, CPSGMHB Case No. 94-3-0016, Final Decision and Order (April 4, 1995), at *55; *Friends of Pierce County, et al., City of Bonney Lake, and Marilyn Sanders, et al. v. Pierce County, and Orton Farms et al., City of Sumner, Bethell School District, Puyallup School District, and Forterra NW*, CPSRMHB Case No. 12-3-0002c, Final Decision and Order (July 9, 2012), at 11 of 138.

¹⁶ John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 511 (2003) last accessed on Feb. 20, 2024, at: https://www.ezview.wa.gov/Portals/_1995/Documents/Documents/Exhibit%20%23J1%20-%20Futurewise%20UrbanSprawl.pdf and at the link on the last page of this letter with the filename: “Urban sprawl and the cost of public services.pdf.” Environment and Planning B is a peer reviewed journal. See the Environment and Planning B webpage last accessed on Feb. 20, 2024,

public services declined with density and increased where urban areas were large.¹⁷ Compact urban growth areas save taxpayers and ratepayers money. Compact urban growth areas will also help achieve the GMA requirements to plan for public facilities and transportation facilities because compact urban growth areas require less costly public facilities.¹⁸

Removing the UGA expansions from the adopted comprehensive plan will help reduce greenhouse gas emissions, reduce adverse impacts on salmon, and reduce costs for taxpayers and ratepayers. We recommend not including UGA expansions in the adopted comprehensive plans.

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

We appreciate that the 2024 Comprehensive Plan Update Draft Environmental Impact Statement for Kitsap County (DEIS) projected greenhouse gas emissions for the three alternatives. Unfortunately, the DEIS concludes that “[r]elative to 2019 greenhouse gas (GHG) emissions will increase under all three alternatives.”¹⁹

Increasing greenhouse gas emissions is inconsistent with VISION 2050. Comprehensive plans must be consistent multicounty planning policies.²⁰ VISION 2050 includes the following goal:

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

<https://journals.sagepub.com/home/epb> and at the link on the last page of this letter with the filename: “Environ & Planning B webpage.pdf.”

¹⁷ John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B: PLANNING AND DESIGN 503, 518 (2003).

¹⁸ RCW 36.70A.020(10), (12); RCW 36.70A.060(2); RCW 36.70A.070(3), (6).

¹⁹ 2024 Comprehensive Plan Update Draft Environmental Impact Statement Kitsap County p. 1-8 (Dec. 2023) last accessed on Oct. 23, 2024, at:

https://www.kitsap.gov/dcd/PEP%20Documents/121523_Kitsap%20County%20Comp%20Plan%20Update%20Draft%20EIS.pdf.

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

and 80% below 1990 levels by 2050) and prepares for climate change impacts.²¹

Multicounty Planning Policy (MPP)-CC-11 provides “[s]upport achievement of regional greenhouse gas emissions reduction goals through countywide planning policies and local comprehensive plans.”²² CC-Action-3, Policies and Actions to Address Climate Change, provides that:

Cities and counties will incorporate emissions reduction policies and actions that contribute meaningfully toward regional greenhouse gas emission goals, along with equitable climate resiliency measures, in their comprehensive planning. Strategies include land uses that reduce vehicle miles traveled and promote transit, biking, and walking consistent with the Regional Growth Strategy, developing and implementing climate friendly building codes, investments in multimodal transportation choices, and steps to encourage a transition to cleaner transportation and energy systems.²³

As you can see, the goal, multicounty planning policy, and action require the Kitsap County Comprehensive Plan to incorporate emissions reduction policies and actions that contribute meaningfully toward regional greenhouse gas emission goals. These goals are substantial. A comprehensive plan whose alternatives will increase greenhouse gas pollution is inconsistent with VISION 2050. The County must comply with the requirement that the comprehensive plan policies and actions must reduce greenhouse gas emissions. This the current draft does not do.²⁴

We appreciate and support that the Planning Commission recommendation calls for incorporating the Puget Sound Regional Council Regional greenhouse gas emission targets.²⁵ Reducing the urban growth area expansions will help meet these targets but are likely not enough.²⁶

²¹ Puget Sound Regional Council, *VISION 2050: A Plan for the Central Puget Sound Region* p. 56 (Oct. 2020) last accessed on Feb 20, 2024, at: <https://www.psrc.org/planning-2050/vision-2050> and at the link on the last page of this letter with the filename: “vision-2050-plan.pdf.

²² *Id.* p. 61.

²³ *Id.*

²⁴ 2024 Comprehensive Plan Update Draft Environmental Impact Statement Kitsap County p. 1-8 (Dec. 2023).

²⁵ *Kitsap Comprehensive Plan Update Planning Commission Recommendation Preferred Alternative* p. 8 (March 26, 2024) last accessed on Oct. 10, 2024, at: <https://www.kitsap.gov/dcd/PEP%20Documents/Comp%20Plan%20PC%20Pref%20Alt%20Recs%20032624%20%28002%29.pdf>.

²⁶ *Id.* pp. 2 – 3, p. 7.

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

- Not approving comprehensive plan and zoning amendments that will increase greenhouse gas emissions. Amendments that increase greenhouse gas emissions include urban growth area expansions and rural capacity increases.²⁷
- A peer-reviewed scientific paper has documented that to meet the necessary reductions in greenhouse gas pollution higher residential densities are needed.²⁸ Nationally, densities must increase on average by 19 percent.²⁹ The paper concluded this can be achieved by a “mix of small apartment buildings and modest single-family homes”³⁰ Incorporate these housing types and densities into the County’s urban growth areas (UGAs). This will also help make housing more affordable.
- Amend the zoning regulations to allow corner stores, cafes, day care, and other basic services in residential neighborhoods as a transportation mitigation strategy. Bringing these destinations closer to homes will shorten trips and increase the ability of residents to complete these trips by walking and bicycling. This will reduce greenhouse gas emissions and provide healthy, active transportation options.
- Invest in multimodal transportation facilities, which is already a feature of the comprehensive plan, and do not invest in transportation facilities that will increase greenhouse gas emissions.

²⁷ For the correlation between urban form and greenhouse pollution see Daniel Hoornweg, Lorraine Sugar, and Claudia Lorena Trejos Gomez, *Cities and Greenhouse Gas Emissions: Moving Forward* 5 URBANISATION 43, pp. 50 – 52 (2020) last accessed on Oct. 10, 2024, at: <https://journals.sagepub.com/doi/pdf/10.1177/2455747120923557> and at the link on the last page of this letter with the filename: “hoornweg-et-al-2020-cities-and-greenhouse-gas-emissions-moving-forward.pdf.” Urbanisation is a peer reviewed journal. See the Urbanisation webpage last accessed on Oct. 23, 2024, at: <https://journals.sagepub.com/home/urb> and at the link on the last page of this letter with the filename: “Urbanisation webpage.pdf.”

²⁸ Benjamin Goldstein, Dimitrios Gounaridis, and Joshua P. Newell, *The carbon footprint of household energy use in the United States* 117 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA (PNAS) 19122, p. 19122 (Aug. 11, 2020) last accessed on Oct. 23, 2024, at: <https://www.pnas.org/content/117/32/19122> and at the link on the last page of this letter with the filename: “goldstein-et-al-2020-the-carbon-footprint-of-household-energy-use-in-the-united-states.pdf.” PNAS is a peer-reviewed journal. PNAS Author Center last accessed on Oct. 23, 2024, at: <https://www.pnas.org/author-center> and at the link on the last page of this letter with the filename: “PNAS Author Center.pdf.”

²⁹ Benjamin Goldstein, Dimitrios Gounaridis, and Joshua P. Newell, *The carbon footprint of household energy use in the United States* 117 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA (PNAS) 19122, p. 19128 (Aug. 11, 2020).

³⁰ *Id.*

- The Southern Resident Orca Task Force’s *Final Report and Recommendations* recommends promoting “‘live where you work’ to reduce commutes while improving public transportation infrastructure.”³¹ This is an effective mitigating measure to reduce traffic and greenhouse gas emissions along with impacts on water quality and fish and wildlife habitats.
- The U.S. Environmental Protection Agency (EPA) found that state and local governments can significantly reduce greenhouse gas emissions through land and materials management practices such as materials efficiency, industrial ecology, green design, land revitalization, sustainable consumption, smart growth, pollution prevention, and design for environment.³² These should also be included as additional mitigation measures.
- We recommend adding as mitigating measures the strategies and actions identified as most effective to reduce vehicle use by the recent meta-analysis by Kuss and Nicholas.³³

Futurewise supports the Tree Canopy Requirements in the preferred alternative and in proposed Chapter 17.495 KCC, Tree Canopy.

Futurewise supports the Tree Canopy Requirements in the preferred alternative and in proposed Chapter 17.495 KCC, Tree Canopy. A recent peer reviewed study of 93 European cities estimated that increasing the tree coverage to 30 percent would cool cities by a mean of 0.4°C and prevent 2,644 premature deaths.³⁴ A U.S.

³¹ Southern Resident Orca Task Force, *Final Report and Recommendations* p. 107 (Nov. 2019) last accessed on Oct. 23, 2024, at: <https://www.orca.wa.gov/wp-content/uploads/TaskForceFinalReport-2019.pdf> and at the link on the last page of this letter of this letter with the filename: “TaskForceFinalReport-2019.pdf.”

³² US Environmental Protection Agency, Office of Solid Waste and Emergency Response, *Opportunities to Reduce Greenhouse Gas Emissions through Materials and Land Management Practices* pp. 19 – 28 (Sept. 2009) last accessed on Oct. 23, 2024, at: <https://www.epa.gov/sites/production/files/documents/ghg-land-materials-management.pdf> and at the link on the last page of this letter with the filename: “ghg-land-materials-management.pdf.”

³³ Paula Kuss and Kimberly A Nicholas, *A dozen effective interventions to reduce car use in European cities: Lessons learned from a meta-analysis and transition management* 10 CASE STUDIES ON TRANSPORT POLICY pp. 1494-1513 (Issue 3, Sept. 2022) last accessed on Oct. 23, 2024, at <https://www.sciencedirect.com/science/article/pii/S2213624X22000281> and at the link on the last page of this letter with the filename: “1-s2.0-S2213624X22000281-main.pdf.” Case Studies On Transport Policy is a peer reviewed journal. Case Studies On Transport Policy Guide for Authors pp. *11 – 12 last accessed on Oct. 23, 2024, at: <https://www.sciencedirect.com/journal/case-studies-on-transport-policy/publish/guide-for-authors> and at the link on the last page of this letter with the filename: “Case Studies on Transpo Policy Guide for authors.pdf.”

³⁴ Tamara Iungman, MPH Marta Cirach, MSc Federica Marando, PhD Evelise Pereira Barboza, MPH Sasha Khomenko, MSc Pierre Masselot, PhD, *et al.*, *Cooling cities through urban green infrastructure: a health impact assessment of European cities* 401 THE LANCET 577, 577 (Published: Jan. 31, 2023 DOI: [https://doi.org/10.1016/S0140-6736\(22\)02585-5](https://doi.org/10.1016/S0140-6736(22)02585-5) last accessed on April 3, 2024).

Forest Service team “found that 403 premature adult deaths – 3% of the city’s total mortality – might be prevented each year if the city [of Philadelphia] increased tree canopy cover to 30% by 2025.”³⁵ Urban trees have other benefits including energy savings, reduced air pollution, reduced stormwater runoff, and wildlife habitat.³⁶ Urban trees are cost-effective. A study of five cities found that they “spent \$13– 65 annually per tree, but benefits returned for every dollar invested in management ranged from \$1.37 to \$3.09.”³⁷ The study cautions that costs are highly variable and so cannot be generalized to other jurisdictions.³⁸ But they do show that urban trees produce more benefits than costs. For these reasons, we strongly support the Urban Tree Canopy policies and regulations.

The comprehensive plan needs to reduce rural growth rates over time and to achieve the Regional Growth Strategy adopted rural population growth target of eight percent of the county’s total population growth consistent with Multicounty Planning Policy MPP-RGS-14 and the Regional Growth Strategy.

The Growth Management Act requires counties to comply with the Puget Sound Regional Council Multicounty Planning Policies.³⁹ Multicounty Planning Policy MPP-RGS-14 directs Kitsap County, and all of the Central Puget Sound counties, to “[m]anage and reduce rural growth rates over time, consistent with the Regional Growth Strategy, to maintain rural landscapes and lifestyles and protect resource lands and the environment.”⁴⁰ The Regional Growth Strategy adopted rural population growth target of eight percent of the county’s total population growth

³⁵ Connie Ho, *Can trees save lives? Forest Service research suggests they can* (USDA Natural Resources and Environment webpage: April 29, 2022), last accessed on April 3, 2024, at: <https://www.fs.usda.gov/features/can-trees-save-lives> and at the link on the last page of this letter with the filename: “Can trees save lives_ _ US Forest Service.pdf.”

³⁶ Greg McPherson, James R. Simpson, Paula J. Peper, Scott E. Maco, and Qingfu Xiao, *Municipal Forest Benefits and Costs in Five US Cities* 103 JOURNAL OF FORESTRY 411, 412 (Dec. 2005) last accessed on April 3, 2024, at: https://www.fs.usda.gov/psw/publications/mcpherson/psw_2005_mcpherson003.pdf and at the link on the last page of this letter with the filename: “psw_2005_mcpherson003.pdf.” The Journal of Forestry is peer reviewed. Journal of Forestry Guide for Authors webpage last accessed on March 30, 2023, at: https://academic.oup.com/jof/pages/General_Instructions?login=false and in the Dropbox link on page 7 of this letter with the filename: “General Instructions _ Journal of Forestry _ Oxford Academic.pdf.”

³⁷ Greg McPherson, James R. Simpson, Paula J. Peper, Scott E. Maco, and Qingfu Xiao, *Municipal Forest Benefits and Costs in Five US Cities* 103 JOURNAL OF FORESTRY 411, 415 (Dec. 2005).

³⁸ *Id.* p. 416.

³⁹ *Stickney v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 11 Wn. App. 2d 228, 244 – 45, 453 P.3d 25, 34 (2019).

⁴⁰ Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p. 43 (Oct. 2020).

or 8,000 people for Kitsap County.⁴¹ On a percentage basis, this is the highest rural growth population growth target of the four Central Puget County counties.⁴² Kitsap County's Buildable Lands Report documents that in 2013 through 2019, 29 percent of the county's population growth occurred in the rural area.⁴³ While this was an improvement over the past years, it shows that Kitsap County faces significant challenges in crafting a comprehensive plan and development regulations that comply with the Regional Growth Strategy.⁴⁴

None of the Rural Land Use Designations and Rural Land Use Goals, Policies, and Strategies call for reducing rural growth rates over time as MPP-RGS-14 requires.⁴⁵ Nor does the Planning Commission's recommendation.⁴⁶ One of the Planning Commission recommendations, changing detached accessory dwelling units from conditional uses to permitted uses in the Suquamish and Manchester limited areas of more intense rural development (LAMIRDs), will increase rural growth.⁴⁷ We do appreciate that the Planning Commission recommended against deleting the lot aggregation requirements in the Suquamish and Manchester LAMIRDs which would also have increased rural growth.⁴⁸ We appreciate that the preferred alternative includes this requirement.

The Future Land Use Map, the Rural Land Use Designations, the rural land use goals, policies, and strategies, and rural zones and development regulations need to reduce rural growth rates over time as MPP-RGS-14 requires. The comprehensive plan must be improved to comply with MPP-RGS-14 and the Regional Growth Strategy.

The Regional Growth Strategy limits rural growth to retain important cultural, economic, and rural lifestyle opportunities; to protect the environment including reducing greenhouse gas pollution; and to reduce the costs of transportation facilities.⁴⁹ So there are important policies behind the numbers.

⁴¹ *Id.* at p. 30.

⁴² *Id.*

⁴³ *Buildable Lands Report Kitsap County, Washington Final* p. 18 (Nov. 2021).

⁴⁴ *Id.* p. 19.

⁴⁵ Final Draft Kitsap County Comprehensive Plan 2024 pp. 63 – 70.

⁴⁶ *Kitsap Comprehensive Plan Update Planning Commission Recommendation Preferred Alternative* p. 7 (March 26, 2024).

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p. 23 – 24, p. 37, p. 43 (Oct. 2020).

The comprehensive plan should not include rural comprehensive plan amendments or upzones that increase rural population and employment capacity.

As discussed above, the Growth Management Act requires counties to comply with the Puget Sound Regional Council Multicounty Planning Policies.⁵⁰ Multicounty Planning Policy MPP-RGS-14 directs Kitsap County, and all of the Central Puget Sound counties, to “[m]anage and reduce rural growth rates over time, consistent with the Regional Growth Strategy, to maintain rural landscapes and lifestyles and protect resource lands and the environment.”⁵¹ The Regional Growth Strategy adopted rural population growth target of eight percent of the county’s total population growth or 8,000 people for Kitsap County.⁵² On a percentage basis, this is the highest rural growth population growth target of the four Central Puget County counties.⁵³ Kitsap County’s Buildable Lands Report documents that in 2013 through 2019, 29 percent of the county’s population growth occurred in the rural area.⁵⁴ While this was an improvement over the past years, it shows that Kitsap County faces significant challenges in crafting a comprehensive plan and development regulations that comply with the Regional Growth Strategy.⁵⁵

The County’s own data makes clear that the one thing Kitsap County should not do is increase rural development capacity. We appreciate that many rural development capacity increases were not included in the Preferred Alternative.⁵⁶ We also recommend that the Rural Deferral proposals be denied rather than deferred as they violate MPP-RGS-14 because they will increase rural capacity and will adversely impact salmon habitat, increase demands on already overallocated water resources, and will increase greenhouse pollution from increase travel in rural areas. The deferrals are just going to increase costs for the County and the public to redo the planning process in the future. The better approach is to just deny them now for the reasons explained above.

⁵⁰ *Stickney v. Cent. Puget Sound Growth Mgmt. Hearings Bd.*, 11 Wn. App. 2d 228, 244 – 45, 453 P.3d 25, 34 (2019).

⁵¹ Puget Sound Regional Council, *Vision 2050: A Plan for the Central Puget Sound Region* p. 43 (Oct. 2020).

⁵² *Id.* at p. 30.

⁵³ *Id.*

⁵⁴ *Buildable Lands Report Kitsap County, Washington Final* p. 18 (Nov. 2021).

⁵⁵ *Id.* p. 19.

⁵⁶ Kitsap County Staff Report – 2024 Comprehensive Plan Periodic Update Exhibit J: Reclassification Request Table 2024 Table pp. 3 – 5 last accessed on Oct. 24, 2024, at: <https://www.kitsap.gov/dcd/PEP%20Documents/20241022%20Reclassification%20Table.pdf>.

Futurewise supports Land Use Goal 7, Historic, archaeological, and cultural resources, and the associated Land Use Policies and Strategies. Please see page 37 of the Final Draft Kitsap County Comprehensive Plan 2024.

Futurewise supports Land Use Goal 7, Historic, archaeological, and cultural resources, and its associated Land Use Policies and Strategies. We particularly support the addition of Land Use Strategy 7.b. calling on the County to “[c]onsider the need for pre-ground disturbance site investigations for sites where predictive model show cultural resources are likely or when requested by affected Native American tribes and Nations.” The Washington State Department of Archaeology and Historic Preservation has developed an archaeological predictive model that can help predict where archaeological resources are likely to be located and where the department recommends archaeological surveys should be completed before earth disturbing activities and other uses and activities that can damage archaeological sites are undertaken.⁵⁷ Large areas of Kitsap County are rated as “4 - Survey Highly Advised: High Risk (Color: Pale Yellow)” and “5 - Survey Highly Advised: Very High Risk (Color: Brightest Yellow/Canary Yellow).” The map also shows other areas where surveys are also advised. This documents the clear need to protect archaeological and cultural resources in Kitsap County.

Earth disturbing activities undertaken before a survey has been completed may result in significant cost increases including work stoppages and even project cancellation in addition to the destruction of important archeological and cultural resources. For example, the Jefferson County Public Utility District’s (PUD) contractor building a community septic system at Becket Point in Jefferson County encountered human bones and Native American artifacts.⁵⁸ The contractor had to stop construction. An archaeologist was called in and an investigation that allowed the project to be redesigned and completed. However, PUD staff “estimated the delays and additional engineering incurred because of the artifacts added about \$90,000 to the project’s cost.”⁵⁹ At least some of that money could have been saved by an upfront archeological investigation.

⁵⁷ Washington State Department of Archaeology and Historic Preservation WISAARD webpage last accessed on Oct. 24, 2024, at: <https://dahp.wa.gov/historic-preservation/find-a-historic-place>. The results of the predictive model are available for Whatcom County to use in planning and project reviews from the Washington State Department of Archaeology and Historic Preservation.

⁵⁸ Jeff Chew, *Jefferson PUD sticks with Beckett Point* Connections p. 8 (Washington Public Utility Districts Association [WPUDA]: Winter 2008) last accessed on Oct. 24, 2024, at: <https://www.yumpu.com/en/document/view/46547248/connections-washington-public-utility-district-association/11>.

⁵⁹ *Id.* at p. 9.

So we strongly support the addition of Land Use Strategy 7.b. to address these important issues. This land use strategy will also help address the Growth Management Act historic preservation goal.⁶⁰

Futurewise also recommends adding a strategy to protect landscape scale cultural resources. Historic culturally important landscapes are “large scale properties are often comprised of multiple, linked features that form a cohesive ‘landscape.’”⁶¹ They are important to Native American Tribes, Nations, and peoples.⁶² For example, tribal members probably cannot sustain a spiritual cultural practice like bathing in a creek when the culturally significant creek is surrounded by houses and clearcuts. These areas need to be identified in consultation with Indian Tribes and Nations. Looking at cultural natural resources at the landscape level would help tribes (and the rest of us) meet their expressed goals for functional habitats that we are continuing to fall short on. Tribal natural cultural resources need to be considered when defining UGAs in consultation with Indian Tribes and Nations.

Futurewise supports the Environment Element in the Comprehensive Plan.

As the comprehensive plan states, Kitsap County residents and businesses benefit from a functioning environment. A functioning environment is also important to recover salmon. Kitsap County should be proud of its many positive actions to protect and restore the environment and summarized on page 94 of the Final Draft Kitsap County Comprehensive Plan 2024.

The Environment Goals, Policies and Strategies should limit impervious surfaces and forest clearing to protect salmon habitat particularly outside urban growth areas. See the Environment Goals, Policies and Strategies on pp. 97-103 and the rural comprehensive plan designations in the Final Draft Kitsap County Comprehensive Plan 2024.

Researchers at the University of Washington have carefully studied the effects of development on stream basins in the Puget Sound Region. These studies have shown that when total impervious surfaces exceed five to ten percent and forest cover declines below 65 percent of the basin, then salmon habitat in streams and

⁶⁰ RCW 36.70A.030(13) Historic preservation. Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance.

⁶¹ Advisory Council on Historic Preservation, *Native American Traditional Cultural Landscapes Action Plan* p. 1 (Nov. 23, 2011) last accessed on April 5, 2024, at: <https://www.achp.gov/sites/default/files/guidance/2018-06/NativeAmericanTCLActionPlanNovember232011.pdf> and at the link on the last page of this letter with the file name: “NativeAmericanTCLActionPlanNovember232011.pdf.”

⁶² *Id.*

rivers is damaged.⁶³ Impervious surfaces are continuing to increase in Kitsap County.⁶⁴ We recommend policies and regulations that will keep total impervious surfaces below five to ten percent and forest cover at or above 50 percent of the basin to protect salmon habitat.⁶⁵

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

Climate change is already causing adverse impacts on Kitsap County.⁶⁶ These adverse impacts are only going to worsen.⁶⁷ Kitsap County is wise to include a Climate Change Element in the Comprehensive Plan and Futurewise supports the element.

We recommend that Climate Change Policy 4.1 on page 187 also protect historic culturally important landscapes from climate impacts. Historic culturally important landscapes are “large scale properties are often comprised of multiple, linked features that form a cohesive ‘landscape.’”⁶⁸ They are important to Native American Tribes, Nations, and peoples.⁶⁹ We recommend the following revision to Climate Change Policy 5.1 with our addition double underlined.

Climate Change Policy 4.1. Protect and preserve historical and archaeological sites and historic culturally important landscapes from climate impacts.

⁶³ Christopher W. May, Richard R. Horner, James R. Karr, Brian W. Mar, Eugene B. Welch, *The Cumulative Effects of Urbanization on Small Streams in the Puget Sound Lowland Ecoregion* p. 17 of 26 (University of Washington, Seattle Washington) last accessed on Oct. 24, 2024, at: https://www.researchgate.net/publication/240437080_Effects_of_Urbanization_on_Small_Streams_in_the_Puget_Sound_Lowland_Ecoregion and enclosed at the link on the last page of this letter with the filename: “Effects_of_Urbanization_on_Small_Streams_in_the_Pu.pdf.”

⁶⁴ *2020 State of Our Watersheds State of Our Watersheds: A Report by the Treaty Tribes in Western Washington* p. 316, p. 318 last accessed on Oct. 24, 2024, at: <https://nwifc.org/publications/state-of-our-watersheds/> and at the link on the last page of this letter with the filename: “state-of-our-watersheds-sow-2020-final-web.pdf.”

⁶⁵ Christopher W. May, Richard R. Horner, James R. Karr, Brian W. Mar, Eugene B. Welch, *The Cumulative Effects of Urbanization on Small Streams in the Puget Sound Lowland Ecoregion* pp. 20 – 21 of 26 (University of Washington, Seattle Washington).

⁶⁶ Kitsap County, Bremerton, and Port Orchard, *Kitsap County Climate Change Resiliency Assessment* p. 8 (June 2020 | Final Report) last accessed on Feb. 28, 2024, at: https://www.kitsap.gov/dcd/Pages/Climate_Change_Resiliency_KC.aspx.

⁶⁷ *Id.* p. 10.

⁶⁸ Advisory Council on Historic Preservation, *Native American Traditional Cultural Landscapes Action Plan* p. 1 (Nov. 23, 2011).

⁶⁹ *Id.*

Please adopt policies and regulations to direct growth away from the Wildland-Urban Interface (WUI) and to encourage and require Firewise Principles. See page 192 of the Final Draft Kitsap County Comprehensive Plan 2024.

Large areas of Kitsap County are located in the Wildland-Urban Interface (WUI).⁷⁰ Wildfire is a significant threat in Kitsap County and climate change is making the threat worse.⁷¹ The Growth Management Act in RCW 36.70A.070(1) provides in part that:

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

⁷⁰ Ashley Blazina and Kirk Davis, *The Wildland-Urban Interface: Mapping Washington State's fastest-growing environment* (Sept. 2, 2020) last accessed on Feb. 17, 2024, at: <https://storymaps.arcgis.com/stories/7016c437623a445997c072a05e26afbb>. See also the map University of Washington Climate Impacts Group's (UW CIG) Climate Mapping for a Resilient Washington (CMRW) webtool Change in High Fire Danger Days last accessed on Feb. 20, 2024, at: <https://cig-wa-climate.nkn.uidaho.edu/> and at the link on the last page of this letter with the filename: "Kitsap Cnty Change in High Fire Danger Days.png." The State of Washington Department of "Commerce considers the CMRW webtool a source of best available science and scientifically credible projections, so this guidance makes using the webtool a required starting point for all jurisdictions that are creating or updating a climate resilience sub-element. Commerce encourages jurisdictions to use additional resources ..., as needed, to explore climate hazards and impacts on local assets and sectors. State of Washington Department of Commerce Climate Element Planning Guidance p. 17 (Dec. 2023 – Intermediate Version) last accessed on Feb. 20, 2024, at: <https://deptofcommerce.app.box.com/s/fpg3holbwn2ctqig7jg802h54ie19jx> and at the link on the last page of this letter with the filename: "IntermediatePlanningGuidance_FINAL.pdf."

⁷¹ H.A. Morgan, A. Bagley, L. McGill, and C.L., Raymond, *Managing Western Washington Wildfire Risk in a Changing Climate Workshop Summary* pp. 4 – 7 (Workshop summary report prepared by the Northwest Climate Adaptation Science Center and the Climate Impacts Group, University of Washington, Seattle: Dec. 3, 2018) last accessed on Feb. 20, 2024, at: <https://cig.uw.edu/publications/managing-western-washington-wildfire-risk-in-a-changing-climate/> and at the link on the last page of this letter with the filename: "Managing-Western-Washington-Wildfire-Risk-in-a-Changing-Climate.pdf."

While we appreciate and support the several wildfire policies, RCW 36.70A.070(1) requires more. We recommend that development be directed away from the WUI. We also recommend the adoption and enforcement of the Firewise Principles which recommend “‘two ways out’ of the neighborhood for safe evacuation during a wildfire along with other important measures to protect people and property[.]”⁷² We recommend that the following new policy be adopted as part of the Land Use Element or the Climate Change Element:

Climate Change Strategy 11.e. Direct non-resource land uses and development away from the Wildland-Urban Interface (WUI), encourage the implementation of Firewise Principles for existing developments and uses, and require implementation of Firewise Principles for new developments and uses.

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

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

In 2023, the State of Washington Department of Commerce updated its minimum guidelines for designating agricultural lands of long-term commercial significance. These changes included expanding the soil types that indicate an area has long-term commercial significance to include farmlands of statewide importance soils in addition to prime and unique farmland soils.⁷³ Commerce made additional changes in 2023 as well.⁷⁴

The 2022 Census of Agriculture documents that the acres of land in farms in Kitsap County increased from 9,391 acres in 2017 to 9,539 acres in 2022.⁷⁵ Total income from farm-related sources in Kitsap County increased from \$3,161,000 in

⁷² *A Guide To Firewise Principles* p. *4 accessed on Feb. 21, 2024, at: <https://www.nfpa.org/education-and-research/wildfire/firewise-usa/firewise-toolkit> and enclosed at the link on the last page of this letter with the filename: “FirewiseToolkitFirewisePrinciples.pdf.”

⁷³ WAC 365-190-050(3)(c)(i) (2023).

⁷⁴ WAC 365-190-050 (2023).

⁷⁵ United States Department of Agriculture National Agricultural Statistics Service, *2022 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-22-A-47 Chapter 2. County Data Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2022 and 2017* p. 286 (Issued Feb. 2024) last accessed on Oct. 24, 2024, at: https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1_Chapter_2_County_Level/Washington/ and at the link on the last page of this letter with the filename: “wav1.pdf.”

2017 to \$4,791,000 in 2022.⁷⁶ Average per farm income increased from \$23,944 in 2017 to \$53,831 in 2022.⁷⁷

One of the purposes of periodic updates is to comply with the requirements of the Growth Management Act including the designation of natural resource lands and the application of the minimum guidelines in WAC 365-190-050.⁷⁸ Given the changes in the minimum guidelines and the economic benefit of local agriculture, Kitsap County should designate agricultural lands of long-term commercial significance in the comprehensive plan consistent with the updated minimum guidelines.

While we appreciate the addition of Land Use Strategy 18.e. which calls on the County to “[r]eview Kitsap’s agricultural land uses, businesses, and products against the criteria for agricultural resource lands and evaluate future designation,”⁷⁹ periodic updates which now take place only once every ten years are the time to update the comprehensive plan and development regulations to comply with the Washington State Department of Commerce’s updated regulations not some undefined future update.

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

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

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

⁷⁶ United States Department of Agriculture National Agricultural Statistics Service, *2022 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-22-A-47 Chapter 2. County Data Table 6. Income From Farm-Related Sources: 2022 and 2017* p. 274 (Issued Feb. 2024).

⁷⁷ *Id.*

⁷⁸ RCW 36.70A.130(1)(a); *Concerned Friends of Ferry Cnty. v. Ferry Cnty.*, 191 Wn. App. 803, 834, 365 P.3d 207, 222 (2015).

⁷⁹ Final Draft Kitsap County Comprehensive Plan 2024 p. 71.

water uses are consistent with RCW 90.44.050 and with applicable rules adopted pursuant to chapters 90.22 and 90.54 RCW when making decisions under RCW 19.27.097 and 58.17.110.

These policies development regulations are required because overuse of surface or ground water often harms senior water rights holders and fish and wildlife habitat and consequently tribal treaty rights. “Eighty percent (80%) of the Kitsap County population uses groundwater that is pumped from wells.”⁸⁰ “As the population grows, so does the demand for groundwater. The quantity of usable groundwater is limited.”⁸¹ As water use increases, water levels decline, groundwater discharges to streams decrease, and seawater intrudes into groundwater.⁸² “Coho salmon, steelhead and cutthroat trout are the most vulnerable to low stream flows (and warm waters) because they rear in freshwater in the summer when low flow/high temperature conditions can constrain habitat and stress fish in some streams.”⁸³

The reduced availability of surface water can have a negative impact on all stages of the salmonid life cycle. Water quality (e.g. temperature, flows) is affected by decreased inputs from groundwater. Lessened groundwater input concentrates pollutants, increases temperature, and diminish[es] dissolved oxygen. This is detrimental to salmonid migration, spawning and rearing.⁸⁴

The *East Kitsap Demographically Independent Population (DIP) Steelhead Recovery Plan* “identifies various strategies to address water withdrawals and low streamflows for steelhead and their habitat” including “[e]nforce and improve land-use regulations that protect hydrology, including aquifer recharge areas”⁸⁵

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

RCW 36.70A.590 requires the development regulations to ensure that proposed water uses are consistent with RCW 90.44.050. When the County determines if a

⁸⁰ 2020 State of Our Watersheds State of Our Watersheds: A Report by the Treaty Tribes in Western Washington p. 321.

⁸¹ *Id.*

⁸² *Id.*

⁸³ *Id.*

⁸⁴ *Id.* p. 40.

⁸⁵ *Id.* pp. 321 – 22.

development, land division, or use qualifies for a residential permit exempt well under RCW 90.44.050, the development regulations must require that the County limit the water used by the proposal and the parent parcel that existed in 2002, any lots created from the parent parcel, and any development built on or after 2002 on those lots to the no more than the 5,000 gallons a day allowed by RCW 90.44.050. Under the State Supreme Court's *Campbell and Gwinn* decision, each lot is entitled to one 5,000 gallon per day permit exempt withdrawal for single or group domestic uses under RCW 90.44.050.⁸⁶ A "developer may not claim multiple exemptions for the homeowners."⁸⁷ So each lot that existed in 2002, the year the *Campbell and Gwinn* decision was decided, is entitled to one permit-exempt withdrawal under RCW 90.44.050.

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

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

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

We appreciate and support that the Final Draft Kitsap County Comprehensive Plan 2024 calls for exploring reducing parking requirements in Kingston.⁸⁸ We also support Kingston Strategy 12.a. calling for reduced parking for affordable housing projects.⁸⁹ We support Silverdale Regional Center Policy 4.3. calling for "[r]educ[ing] minimum parking requirements to help facilitate pedestrian-oriented forms of development."⁹⁰ We support the parking reduction related changes in the implementation table and the other parking reduction policies. We

⁸⁶ *State Dep't of Ecology v. Campbell & Gwinn, L.L.C.*, 146 Wn.2d 1, 14, 43 P.3d 4, 110 (2002).

⁸⁷ *Id.*

⁸⁸ Final Draft Kitsap County Comprehensive Plan 2024 pp. 207 -- 208.

⁸⁹ *Id.* p. 211.

⁹⁰ *Id.* p. 243.

support that one parking space in a garage associated with an individual dwelling unit counts as one of the 2.5 required parking spaces for single-family dwellings. We support these recommended changes to the parking regulations as they will help reduce housing costs.

Futurewise also recommends eliminating parking minimums for multifamily, mixed-use housing, and affordable housing with good transit service. Multi-family and mixed-use developments in these areas can help reduce single-occupancy vehicle traffic and increase transit use by being planned and developed as transit-oriented developments.⁹¹

Households living in transit-oriented developments are twice as likely to not own a car, and own roughly half as many cars as comparable households not living in transit-oriented developments.⁹² Eliminating parking minimums does not eliminate parking, instead allows developers to provide the parking the market demands.⁹³

Reducing or eliminating parking also makes housing more affordable.⁹⁴ A study using American Housing Survey data found that “[m]inimum parking requirements in municipal zoning codes drive up the price of housing”⁹⁵ The study authors wrote:

We find that the cost of garage parking to renter households is approximately \$1,700 per year, or an additional 17% of a housing

⁹¹ Futurewise | GGLO | Transportation Choices Coalition, *Transit-oriented communities: A Blueprint for Washington State* pp. 27 – 29 (Oct. 2009) last accessed on Oct. 24, 2024, at: <http://www.reconnectingamerica.org/assets/Uploads/tccblueprintfortoc2009.pdf> and at the link on the last page of this letter with the filename: “tccblueprintfortoc2009.pdf.”

⁹² National Academies of Sciences, Engineering, and Medicine, *Effects of TOD on Housing, Parking, and Travel* p. 6 (Washington, DC: The National Academies Press: 2008) last accessed on Oct. 24, 2024, at <https://doi.org/10.17226/14179> and on the last page of this letter with the filename: “14179.pdf.”

⁹³ *Id.*

⁹⁴ *Id.*

⁹⁵ C. J. Gabbe & Gregory Pierce, *Hidden Costs and Deadweight Losses: Bundled Parking and Residential Rents in the Metropolitan United States* 27 HOUSING POLICY DEBATE 217, 217 (2017) (page 2 in the enclosed version) last accessed on Oct. 24, 2024, at: <https://scholarcommons.scu.edu/cgi/viewcontent.cgi?article=1040&context=ess> and on the last page of this letter with the filename: “Hidden costs and deadweight losses_ Bundled parking andresidentia.pdf.” Housing Policy Debate is peer reviewed. Housing Policy Debate Aims and scope webpage last accessed on Aug. 15, 2024, at: <https://www.tandfonline.com/action/journalInformation?show=aimsScope&journalCode=rhpd20> and at the link on the last page of this letter with the filename: “Housing Policy Debate About this Journal webpage.pdf.”

unit's rent. In addition to the magnitude of this transport cost burden being effectively hidden in housing prices, the lack of rental housing without bundled parking imposes a steep cost on carless renters—commonly the lowest income households—who may be paying for parking that they do not need or want. We estimate the direct deadweight loss for carless renters to be \$440 million annually. We conclude by suggesting cities reduce or eliminate minimum parking requirements, and allow and encourage landlords to unbundle parking costs from housing costs.⁹⁶

Parking reforms work. A peer reviewed study of Seattle's parking reforms showed “that (1) minimum parking requirements constrain developers, though not uniformly; and (2) reducing requirements leads to less parking provision, and presumably cost savings for developers and lower housing prices for consumers. These findings highlight the impact that policymakers can have by reducing or eliminating off-street parking requirements.”⁹⁷ “Seattle developers built 40% less parking than would have been required prior to the reforms, resulting in 18,000 fewer parking spaces and saving an estimated \$537 million.”⁹⁸

The Regional Plan Association looked at trends in the construction of affordable housing in New York City after the city waived parking requirements in certain areas. Since the requirements were waived, the annual number of affordable units built has “shot up.”⁹⁹ “[W]aiving parking requirements for new buildings has yielded more new affordable homes, especially on smaller parcels of land.”¹⁰⁰

In addition to saving money, “parking reform can lower tax rates, revive business districts, decrease property vacancies, and allow development of fewer off-street

⁹⁶ C. J. Gabbe & Gregory Pierce, *Hidden Costs and Deadweight Losses: Bundled Parking and Residential Rents in the Metropolitan United States* 27 HOUSING POLICY DEBATE 217, 217 (2017) (page 2 in the enclosed version).

⁹⁷ C.J. Gabbe, Gregory Pierce, Gordon Clowers, *Parking policy: The effects of residential minimum parking requirements in Seattle* 91 LAND USE POLICY 104053, 104053 (Feb. 2020) last accessed on Feb. 27, 2024, at: <https://www.sciencedirect.com/science/article/abs/pii/S0264837718312870>. Land Use Policy is peer reviewed. *Id.*

⁹⁸ *Id.*

⁹⁹ Regional Plan Association, *Parking Policy Is Housing Policy: How Reducing Parking Requirements Stimulates Affordable Housing Production* p. *1 (Dec. 2022) last accessed on Feb. 27, 2024, at: <https://rpa.org/work/reports/parking-policy-is-housing-policy#zqa-unlocked-potential-for-more-as-of-right-smaller-affordable-developments>.

¹⁰⁰ *Id.* at p. 2.

parking spaces as property becomes available for other uses (Hess, 2017).”¹⁰¹ For all of these reasons, we recommend that residential development, mixed-use, and affordable housing with good existing or planned transit service not be required to provide parking for motor vehicles.

Removing minimum parking requirements is not just for large cities. On August 13, 2024, the City of Spokane permanently removed mandatory parking minimums, “a move councilmembers hope will spur new development.”¹⁰²

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

Very Truly Yours,



Tim Trohimovich
Director of Planning and Law

Enclosures at this link:

https://futurewiseorg.sharepoint.com/:f:/g/Esm6h_SA4lRNmI9V73SKKsEB5-1sFxocA2MbUg2fhAqLUw?e=kFZ6dT

¹⁰¹ Daniel Baldwin Hess Jeffrey Rehler, *Minus Minimums: Development Response to the Removal of Minimum Parking Requirements in Buffalo (NY)* 87 JOURNAL OF THE AMERICAN PLANNING ASSOCIATION 396, 397 (2021) last accessed on Oct. 24, 2024, at: <https://www.tandfonline.com/doi/pdf/10.1080/01944363.2020.1864225?needAccess=true&> and at the link on the last page of this letter with the filename: “Minus Minimums.pdf.” The Journal of the American Planning Association is peer reviewed. Journal of the American Planning Association Instructions for authors at the link on the last page of this letter with the filename: “JAPA Instructions for Authors June 2017.pdf.”

¹⁰² Adam Schwager, *City Council removes parking minimums for new developments* webpage (NonStop Local Multimedia: Aug. 13, 2024), last accessed on Oct. 11, 2024, at: https://www.khq.com/news/city-council-removes-parking-minimums-for-new-developments/article_def8f014-59dd-11ef-af00-b71937c8888c.html.

From: Eric Hall
To: Comp Plan
Subject: Final Draft Comment - Illahee Goal 9 (Illahee Policy 9.1 & 9.2)
Date: Monday, October 28, 2024 4:03:27 PM
Attachments: jmaoe.png
jmaoe.png
Outlook-na3k53lh.png

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Hello all,

I'm Eric Hall and a 4-year resident of Illahee. I want to urge the board to prioritize Illahee and the McWilliams Countywide Center Boundary (Figure 17) for transportation improvements. The Port of Illahee is planning a huge refurbishment of their dock and upland area which will draw in considerable new tourists and fishing enthusiasts. This will increase the amount of pedestrian and vehicle traffic in the area where there are no traffic calming measures in place such as speed tables or sidewalks.

In my short four years here, I've witnessed numerous vehicles, on a daily basis, speed through our 25 MPH zone. During my time as a Precision Measurement Engineer in the U.S. Air Force, I calibrated numerous speed measuring devices for our Security Forces squadrons. I know that if one of those speeding devices flashes "SLOW DOWN" and doesn't display a numerical speed, that car is usually doing 20+ MPH over the limit. I have seen this happen countless times which makes me feel unsafe just to walk and run with my dog along the streets unless I am time constrained or too tired to drive to Illahee State Park or another place with less cars. We've had multiple accidents in the past few months from drivers coming around that curve at high speeds. Please see the image below from the Washington State Patrol's traffic database. Luckily, no one has been injured in these collisions but property has been damaged and homeowners affected by these accidents.

Additionally, I've attached a report from NE McWilliams Rd. This road is listed at 35 MPH and the plans to build a sidewalk and center turning lane were dropped from the Transportation Improvement Plan around 2020. I have witnessed multiple residents with mobility scooters forced into the road or required to drive on the gravel shoulder to be able to access the grocery store and CVS pharmacy along State Highway 303. This is both dangerous and can be extremely maintenance intensive for some of the poorest individuals in our County due to the increased wear and tear on their devices.

If the County wants to be a good steward and owner of the Rolling Hills Golf Course, they should ensure that the road to their facility is as safe as possible. I understand wanting to focus on Fairgrounds Road as the priority due to the numerous public events that go on at the Fairgrounds Complex but Illahee and the surrounding area will soon have more traffic through it and this will lead to more accidents. I encourage the County to be more proactive in their approach and add rumble strips and speed tables to Illahee Road similar to Tracyton Beach Blvd. Also I would suggest re-instating the NE McWilliams Road improvements to the Transportation Improvement Plan.

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Collision Date Range: 01/01/2024 - 10/27/2024

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Collision Information																				
Collision Report Number	Collision Date/Time	County	City	Jurisdiction	Agency	Primary Traffic Way	Secondary Traffic Way	Block Number	Milepost	School Zone	Intersection Related	Weather	Lighting	Injury Severity	Collision Type	Object Struck	Damage Threshold Met	Hit and Run	Motor Vehicles Involved	Passengers Involved
EE41361	1/8/2024 14:20 PM	Kitsap	Bremerton	County Road	County Sheriff	LLAHEE RD NE	NE 3RD ST	6600		N	Y	Raining	Daylight	No Injury Collision		Utility Pole	Y	N	2	N
EE45064	1/27/2024 10 06 00 AM	Kitsap	Bremerton	County Road	County Sheriff	LLAHEE RD NE	GRAHNS LNE NE	7500		N	Y	Raining	Daylight	No Injury Collision		Earth Bank or Ledge	N	N	1	Y
EE46995	2/2/2024 5 48 00 PM	Kitsap	Bremerton	County Road	County Sheriff	LLAHEE RD NE	NE LORRETTALN			N	N	Clear	Dark-Street Lights On	No Injury Collision			N	N	2	Y
EE46995	2/2/2024 5 48 00 PM	Kitsap	Bremerton	County Road	County Sheriff	LLAHEE RD NE	NE LORRETTALN			N	N	Clear	Dark-Street Lights On	No Injury Collision			Y	N	2	Y
EE56775	3/4/2024 12 04 00 PM	Kitsap	Bremerton	County Road	County Sheriff	LLAHEE RD NE	NE 3RD ST N	6728		N	N	Clear	Daylight	Unknown Injury Collision		Utility Pole	N	Y	1	N
EE56775	3/4/2024 12 04 00 PM	Kitsap	Bremerton	County Road	County Sheriff	LLAHEE RD NE	NE 3RD ST N	6728		N	N	Clear	Daylight	Unknown Injury Collision		Utility Pole	Y	Y	1	N
EE75336	5/5/2024 11 37 00 PM	Kitsap	Bremerton	County Road	County Sheriff	LLAHEE RD NE	NE ROOSEVELT ST	5000		N	N	Raining	Dark-Street Lights On	No Injury Collision		Roadway Ditch	Y	N	1	N
EE96834	7/11/2024 5 36 00 AM	Kitsap	Bremerton	County Road	County Sheriff	LLAHEE RD NE	STEINMAN RD NE	4300		N	N	Clear	Daylight	Minor Injury Collision		Guardrail	Y	N	1	N
EF21030	9/25/2024 8 30 00 AM	Kitsap	Bremerton	County Road	County Sheriff	LLAHEE RD NE	RUE VILLA NE	4426		N	N	Clear	Daylight	Unknown Injury Collision		Tree or Stump	N	Y	1	N
EF28226	10/2/2024 9 01 00 PM	Kitsap	Bremerton	County Road	County Sheriff	LLAHEE RD NE	OCEAN VIEW BLVD NE	5810		N	N	Clear	Dark-No Street Lights	No Injury Collision			Y	Y	2	N
EF24727	10/12/2024 3 12 00 AM	Kitsap	Bremerton	County Road	County Sheriff	LLAHEE RD NE BR	NE ROOSEVELT ST	5397		N	N	Clear	Dark-Street Lights On	No Injury Collision		Utility Pole	Y	N	1	N

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Collision Date Range: 01/01/2024 - 10/27/2024

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Export Detail to Excel (CSV)

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Collision Information

Collision Report Number	Collision Date/Time	County	City	Jurisdiction	Agency	Primary Traffic Way	Secondary Traffic Way	Block Number	Milepost	School Zone	Intersection Related	Weather	Lighting	Injury Severity	Collision Type	Object Struck	Damage Threshold Met	Hit and Run	Motor Vehicles Involved
EE36956	1/1/2024 9:44:00 PM	Kitsap	Bremerton	County Road	County Sheriff	NE MCWILLIAMS RD	NE ATHENS WAY	2500		N	N	Fog or Smog or Smoke	Dark-Street Lights On	Minor Injury Collision			Y	N	2
EE41425	1/10/2024 6:40:00 PM	Kitsap	Bremerton	County Road	County Sheriff	NE MCWILLIAMS RD	SR 303			N	N	Overcast	Dark - Unknown Lighting	Minor Injury Collision			Y	Y	2
EE50665	2/5/2024 6:52:00 PM	Kitsap	Bremerton	County Road	County Sheriff	NE MCWILLIAMS RD	NE TUCANNON CT	400		N	N	Overcast	Dark-Street Lights On	No Injury Collision			Y	N	3
EE54513	2/25/2024 8:52:00 PM	Kitsap	Bremerton	County Road	County Sheriff	MCWILLIAMS RD NE	SUNSET AVE NE	3200		N	Y	Clear	Dark-Street Lights On	No Injury Collision		Roadway Ditch	Y	N	2
EE65873	4/5/2024 7:30:00 PM	Kitsap	Bremerton	County Road	County Sheriff	NE MCWILLIAMS RD	HWY 303	6400		N	N	Clear	Daylight	No Injury Collision			Y	N	2
EE68627	4/9/2024 3:32:00 PM	Kitsap	Bremerton	County Road	State Patrol	MCWILLIAMS	STATE ROUTE 303	1700		N	N	Clear	Daylight	No Injury Collision			Y	N	2
EE78071	5/17/2024 10:44:00 PM	Kitsap	Bremerton	County Road	County Sheriff	MCWILLIAMS RD NE	PINE RD NE	600		N	N	Clear	Dark-Street Lights On	No Injury Collision			Y	N	2
EE84714	6/2/2024 1:15:00 PM	Kitsap	Bremerton	County Road	County Sheriff	NE MCWILLIAMS RD	STATE HWY 303 NE	1600		N	N	Raining	Daylight	Unknown Injury Collision		Street Light Pole	Y	N	1
EE88520	6/17/2024 6:51:00 AM	Kitsap	Bremerton	County Road	County Sheriff	NE MCWILLIAMS RD	CENTRAL VALLEY RD NE	6000		N	N	Clear	Daylight	No Injury Collision			Y	N	3
EE96645	7/12/2024 5:36:00 AM	Kitsap	Bremerton	County Road	County Sheriff	NE MCWILLIAMS RD	STATE HWY 303 NE	6400		N	N	Clear	Daylight	No Injury Collision			Y	N	2
EF07743	8/22/2024 3:49:00 PM	Kitsap	Bremerton	County Road	County Sheriff	NE MCWILLIAMS RD	HANBERG LN NE	2400		N	N	Clear	Daylight	No Injury Collision		Culvert	Y	N	1
EF12423	9/5/2024 7:30:00 AM	Kitsap	Bremerton	County Road	County Sheriff	NE MCWILLIAMS RD	GRACELAND RD NE	1200		N	N	Clear	Daylight	Minor Injury Collision			Y	N	2
EF14992	9/13/2024 4:56:00 PM	Kitsap	Bremerton	County Road	County Sheriff	NW MCWILLIAMS RD	STATE HIGHWAY 303 NE	1400		N	N	Raining	Daylight	No Injury Collision			Y	N	2

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