

Scoping Summary



**Environmental Impact Statement –
Summary of the Public Scoping Process**

**PORT GAMBLE
REDEVELOPMENT PLAN EIS**

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EA Engineering, Science, and Technology, Inc.**

**Prepared for:
Kitsap County**

May 13, 2013

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PORT GAMBLE REDEVELOPMENT PLAN

SUMMARY OF THE PUBLIC EIS SCOPING PROCESS

Introduction

Olympic Property Group on behalf of Pope Resources, the project applicant, is proposing redevelopment of the Port Gamble site. The 318.7 acre site, comprised of three main areas including a mill site along the waterfront, a town site on the bluffs above the mill site, and an agrarian area which lies to the southwest of town. Proposed redevelopment of Port Gamble could ultimately contain approximately 152,000 square feet of new commercial uses, a 100 room hotel and approximately 270 residential units (including 28 existing residences), with over 100 acres of open space. Build-out of the proposed development is anticipated to take approximately 10 years or more.

Kitsap County is the lead agency under the State Environmental Policy Act (SEPA) (RCW 43.21C and WAC 197-11-050) for this proposal and has determined that the Proposed Actions may have significant adverse impacts on the environment. An environmental impact statement (EIS) will be prepared consistent with WAC 197-11-400 through 460 and Kitsap County SEPA regulations (KCC 18.04). A Determination of Significance (DS) and request for comments on the scope of the EIS was issued on February 22, 2013. Preparation of an EIS pursuant to SEPA by the lead agency will ensure that environmental analysis is incorporated into the project review process, that any potential significant adverse impacts are reviewed and mitigation of those potential impacts are addressed in the EIS and during the project review process.

This document provides a summary of the public EIS scoping process, including: a summary of the EIS scoping comments; and, the final scope of the EIS identified by the County (i.e. the EIS Alternatives, and those Elements of the Environment that the County has identified for analysis in the EIS).

Based on the scope identified herein, the SEPA official will direct preparation of a Draft Environmental Impact Statement (DEIS) to be issued for public comment. After receiving comments on the DEIS from agencies, tribes and the public during a thirty (30) day comment period, the SEPA official will then consider the comments and issue a Final Environmental Impact Statement (FEIS). This FEIS will provide decision makers with relevant information needed to make decisions regarding the Proposed Actions.

Related Environmental Analysis. There are two activities in the vicinity of the Port Gamble redevelopment, and each has its own environmental analysis; 1) ongoing water and sediment cleanup in Port Gamble Bay under the Agreed Order pursuant to the Model Toxics Control Act (MTCA) between Ecology, Pope Resources and Olympic Property Group LLC. Environmental analysis of the cleanup is included as part of this independent process. 2) Pope Resources applied for a new dock in 2009, which will have full SEPA analysis of impacts by the agencies with expertise involved in the separate JARPA process (DOC, Corps of Engineers, DFW, and other parties). The separate dock review processes by local, state and federal agencies will include SEPA/NEPA compliance. The Port Gamble redevelopment project is not proposing any of these activities in the water and would proceed with or without the dock approval. However, the proposed site redevelopment would result in the potential for increased use of the dock.

Location of the Proposal

Port Gamble is located in the north end of Kitsap County in the community of Port Gamble, approximately one mile east of the Hood Canal Bridge adjacent to Hood Canal and Port Gamble Bay. The site is located within Sections 5, 6, 7 and 8 of Township 27 North and Range 02 East of the Willamette Meridian.

The existing development on the site is a mix of residential and commercial uses. The north portion of the project area includes the historic town of Port Gamble and consists of single family residences, open space, a cemetery and a commercial area with shops and restaurants. Along the waterfront in the northeastern corner of the property is the site of a former lumber mill and several existing docks, referred to as the "Mill Site". The Mill Site is a flat, low lying area of approximately 28 acres that was once used as a lumber mill and port. Currently, it is paved and used for storage of equipment, vehicles and material. There are also several businesses currently located on the waterfront. The south portion of the project site is currently undeveloped and consists of a forested area with a stream running to the north and an open grass field.

Description of the Proposal

For the purposes of SEPA review (WAC 197-11-440), the following are the applicant's objectives for site development:

- Implement an infill redevelopment plan that integrates residential, commercial, agricultural and open space uses that creates an economically sustainable community.
- Provide new/infill development that recognizes and respects the historic pattern of the community.
- Comply with the regulations of the Limited Area of More Intensive Rural Development (LAMIRD).
- Develop the site to complement Port Gamble's designation as a National Historic Landmark District and placement on the National Register of Historic Places.
- Enhance the community's economic vitality by creating conditions that will be attractive to a range of employment opportunities and businesses, including commercial, tourism, recreational and agricultural uses.
- Provide an improved and coordinated network of utility systems, including stormwater and sewage treatment.
- Protect naturally constrained areas on and immediately adjacent to the site, including Hood Canal, Gamble Bay, Machias Creek, wetlands, streams, and critical recharge areas, to the extent feasible.
- To the best extent possible, preserve forested areas and trails as recreational and ecological amenities.
- Ensure that development is compatible with environmental remediation efforts associated with Port Gamble Bay.
- Continue to coordinate with federal, state, and local agencies, tribes, organizations and the public and private sectors to facilitate redevelopment planning and implementation that will be successful and an asset to the Port Gamble community.
- Propose new development that is economically feasible for the market and reasonably achievable within a practical time period.

To implement the vision for the site, the Proposed Actions for the Port Gamble Redevelopment proposal includes:

- Kitsap County Preliminary Plat approval;
- Kitsap County Shoreline Substantial Development Permit approval;
- Kitsap County Shoreline Setback Variance approval;
- Potential future Development Agreement between Kitsap County and Olympic Property Group; and,
- Future local, state and federal permits that would be required for construction and redevelopment of Port Gamble.

EIS Scoping Process

For purposes of the Port Gamble Redevelopment project, Kitsap County is responsible for performing the duties of a lead agency, as required by SEPA. A representative from the County's Planning and Environmental Programs Division is serving as the Responsible Official for the SEPA review.

The purpose of EIS Scoping is to narrow the focus of the EIS to only address “probable significant adverse impacts and reasonable alternatives.” As defined in SEPA, “significant” means a reasonable likelihood of more than a moderate impact on the environment. Based on this definition, the City *preliminarily* identified **Earth, Water Resources, Plants and Animals, Historic and Cultural Resources, Air Quality/Greenhouse Gas Emissions, Environmental Health, Land Use/Relationship to Plans and Policies, Recreation, Aesthetics/Light and Glare, Traffic, Public Services, and Utilities** as the elements to be evaluated in this EIS. The County also preliminarily determined that the proposal, one development alternative, and the No Action alternative would be analyzed in the Draft EIS.

Through EIS Scoping, certain development alternatives and/or elements of the environment may be eliminated or others added to the scope of the EIS. The EIS may highlight why other elements of the environment do not meet the SEPA threshold of significance and are not analyzed in the EIS (i.e. because features of the proposal, as well as implementation of local, state and federal regulations, would minimize the potential for impacts and significant unavoidable adverse impacts would not be anticipated).

On February 22, 2013, Kitsap County initiated the EIS scoping process for the Port Gamble Redevelopment project by issuing a Determination of Significance (DS) and Request for Comments on the Scope of the EIS (see **Appendix A** to this Summary for the DS). The DS indicated that a public meeting would be held on March 18, 2013, to provide an opportunity for the public to learn more about the proposal/proposed actions and to provide input to the environmental review process. The DS also noted that the scoping period would end on March 20, 2013, exceeding the minimum 21-day period required by SEPA. Kitsap County carried out the following actions during EIS scoping to inform the public, agencies and stakeholders of the EIS process:

- Published notice of the DS/Request for Comments in the WA Department of Ecology's SEPA Register;
- Published notice of the DS/Request for comments in the following newspaper: *Kitsap Sun* and *North Kitsap Herald*; and,

- Mailed the DS/scoping notice to federal/state/local agencies and surrounding jurisdictions and the local Tribes (see **Appendix B** to this Summary for a list of these agencies/jurisdictions).

The EIS Scoping notification actions comply with applicable noticing requirements.

The EIS Public Scoping meeting was held in the City of Poulsbo Council Chambers on March 18, 2013, to provide the public with opportunities to comment on the range of environmental issues, alternatives and actions that should be considered in the EIS. The meeting included an introduction to the EIS process and scoping by the County's Environmental Planner, David Greetham; a description of the proposal by the applicant's representative, Jon Rose; and, a description of the elements of the environment and EIS alternatives preliminarily identified for study in the EIS by the County's EIS consultant, EA. During the EIS Scoping meeting, the public was encouraged to provide both written and/or oral comments on the scope of the EIS. A total of 34 people signed in at the meeting, and eight people provided verbal comments during the EIS Public Scoping meeting. The meeting was held from 5 PM to 7 PM.

During the EIS Scoping comment period, a total of 32 comment letters/emails were received, including 25 from individuals. The following agencies, tribes and organizations also submitted comment letters/emails: Washington State Department of Transportation (WSDOT), Washington State Department of Archeology and Historic Preservation (DAHP), Kitsap County Public Works – Traffic Operations, Kitsap County Fire District 18, Port Gamble S'Klallam Tribe, Suquamish Tribe, Washington Commission on Asian Pacific American Affairs, and Organization of Chinese Americans. The letter from DAHP was received subsequent to the end of the comment period and is included for consideration for the EIS scope. All of the comment letters/emails are available for review at Kitsap County Department of Community Development.

Summary of EIS Scoping Comments

The following summary highlights the major issues that were raised during the scoping process and is organized by major topic areas/elements of the environment headings. This summary does not reflect every individual comment received and recorded, but rather is intended to address the primary subjects of concern. In some cases, several people offered similar comments on a given subject, or one individual repeated the same comment several times.

Earth Comments

Comments were raised regarding the proposed project's potential impacts to earth/onsite soil, including:

- The existing and proposed fill on the mill site, including the compaction of the soil and its permeability, grass seeding, and interim surface flow patterns.
- Armoring structures and the effect on shoreline processes.
- Bluff stability.

Water Resources Comments

The comments on water resources were primarily related to the proposed development and the potential impact to water resources on the site and in the site vicinity, including

- The amount of impervious surface and the potential impact on stormwater and groundwater recharge and water quality.
- The proposed stormwater management plan and potential impacts on the waters of Port Gamble Bay.
- Potential impacts to groundwater from the proposed development, including potential impacts to Critical Aquifer Recharge Areas on the site and surrounding area.
- The fill of the mill site and its impact on groundwater.
- Shoreline armoring and its effect on the aquatic ecosystem.
- Boat discharge from the dock and potential spills and the impact to water quality.
- Agricultural runoff and the impact to water quality.
- Potential increase in dock use associated with site redevelopment.
- Impact to floodplain due to proposed redevelopment.

Plants and Animals Comments

Comments on plants and animals were primarily related to aquatic species within Port Gamble Bay and Hood Canal, as well as onsite wetlands and other critical areas, including:

- Impact from redevelopment on shellfish and fish resources.
- Habitat loss from redevelopment.
- Impacts to previously restored areas.
- Impact of redevelopment on eagles and marbled murrelet.

Historic and Cultural Resources Comments

Comments were raised regarding the proposed development and potential impacts on historic and cultural resources on site and in the site vicinity, including:

- Potential impacts on existing historic and cultural resources.
- Policy and procedural approach to archeological properties, cultural resources and cultural landscapes.
- Visual and architectural relationship between the mill site and the historic district on the bluff above.
- Recognition of all cultural resources of Port Gamble, including lumber/forest, marine/fishing, Native American, and Chinese American.
- Consistency with treaty rights of local tribes.

Air Quality/ Greenhouse Gas (GHG) Emissions Comments

One comment regarding air quality was submitted, regarding increased exhaust from trucks, cars and boats during construction and operation of the proposed project, and dust generation during construction.

Environmental Health Comments

Comments were raised regarding the relationship between the cleanup process and the proposed development, including:

- Removal of contaminated soil onsite and resulting dust particles.
- Coordination with current and future MTCA cleanup/restoration actions.

- Development on the site should include measures to mitigate impacts of potential excavation into contaminated soils.

Land Use/Plans and Policies Comments

Comments on land uses were primarily related to the land uses on the mill site and adherence to existing plans, including:

- The location of the hotel within the existing floodplain, outside of the existing commercial district.
- Provision of low income housing.
- Variance from existing Shoreline Management Plan standards and relationship to proposed SMP standards.
- Verify compliance with open space requirements.
- Potential for proposed development to result in spin-off development.

Recreation Comments

Comments on recreation were primarily related to retaining public access to existing and proposed amenities, including:

- Public access to the existing trail network, shoreline areas and the proposed dock.
- The ability to launch kayaks, canoes and rowboats from the shoreline or dock.

Aesthetics/Light and Glare Comments

Comments were received on the proposed development and its impacts on the aesthetic character of the site and site vicinity, including:

- Impact of proposed development on rural character.
- Compatibility of upland infill development with existing historic structures.
- Existing and future street lighting and the impact on the night sky and tribe uses across the bay.

Traffic Comments

Comments on traffic were primarily related to the capacity of the surrounding transportation network, including:

- Increased traffic on SR 104 and also SR 3.
- Cumulative impacts of bridge closures, residents/lot owners, hotel guests, trail users, ferry users, and tourists.
- Increased vessel activity.
- Relationship to potential future SR 104 bypass.

Public Services Comments

Comments on public services were primarily related to the proposed development and the impacts on public services, including:

- The capacity of the existing infrastructure to provide adequate fire-fighting capacity.

- Financing of public safety services.

Utilities Comments

Comments on utilities were primarily related to the proposed development and the impacts on utilities, including:

- The proposed large onsite septic system (LOSS) and alternative treatment methods.
- Location of the LOSS and the relationship to groundwater and water quality.
- Proposed rain gardens and the discharge to Hood Canal.
- Viability of proposed water supply.

Other Comments

Comments on elements of the environment not preliminary included in the scope of the EIS were submitted, including:

- Noise impacts associated with construction and operations.
- Cumulative impacts associated with all development planned on Hood Canal.

EIS Alternatives Comments

Comments on the EIS alternatives were also submitted, including:

- An alternative considering restoration of the mill site portion of the site should be analyzed.

Conclusions/Revisions to the DEIS Scope

The majority of the comments that were received during the public scoping period for the Port Gamble Redevelopment EIS related to **Water Resources, Environmental Health, Historic and Cultural Resources** and **Transportation**. Based on the elements of the environment initially identified by Kitsap County, along with the comments received during the EIS scoping period, the following elements of the environment will be analyzed in the EIS (see the following *Final Scope of EIS* section for details on the areas to be studied under these elements):

- **Earth**
- **Water Resources**
- **Plants and Animals**
- **Historic and Cultural Resources**
- **Environmental Health**
- **Air Quality/Greenhouse Gas Emissions**
- **Land Use/Relationship to Plans, Policies and Regulations**
- **Aesthetics/Light and Glare**
- **Recreation**
- **Traffic**
- **Public Services**
- **Utilities**

Three EIS alternatives will be analyzed in the EIS: two development alternatives, and the No Action Alternative (see the following *Final Scope of EIS* section for details on the alternatives to be studied).

Final Scope of EIS

EIS Approach

The EIS is intended to address the probable significant adverse impacts that could occur as a result of approval by Kitsap County of the proposed Preliminary Plat and Shoreline Substantial Development permit, and potential future development activities on the site during buildout of the project (assumed for the EIS to occur by 2023). The EIS will analyze a sufficient range of development alternatives with accompanying level of detail and analysis to provide decision makers with relevant information needed to make decisions about the Proposed Actions.

Description of the Alternatives to be Evaluated in the SEPA EIS

For purposes of environmental review, the proposal, one development alternative and a No Action Alternative have been proposed for consideration. These alternatives represent a range of land uses and densities to address the development objectives for the site, the existing regulatory framework, and economic and market factors.

The SEPA EIS will address the probable significant impacts of the alternatives listed below.

Alternative 1

Alternative 1 is the Proposed Action and includes the redevelopment as depicted in the Alternate Plan in the development permits submitted to Kitsap County in January 2013. It would feature infill development on the entire site, including the Mill Site, as proposed in the submitted application, including approximately 270 residential units (including 28 existing residences), approximately 152,000 square feet of commercial uses and a 100 room hotel. New parks would be provided throughout the site and open space would protect existing critical areas. The mill site would be developed with both commercial and residential uses under 35 feet in height. A roundabout would be constructed on SR 104 at Puget Way.

Two scenarios would be analyzed under Alternative 1:

- a. *Shoreline Setback Variance*: The Site Plan as submitted with application, including the proposed variance to reduce the shoreline setback to 35 feet with 15 foot building setback – total of 50 feet.
- b. *No Shoreline Setback Variance*: The Site Plan without the shoreline setback variance – 50 foot shoreline setback with 7.5 foot building setback for a total of 57.5 feet.

Alternative 2

Alternative 2 is the potential development alternative to the Proposed Action and would include the redevelopment of Port Gamble as depicted in the Preferred Plan in the development application submitted to Kitsap County in January 2013; development consistent with this

alternative would be dependent on others purchasing and funding the restoration areas. The upland portion of Alternative 2 is similar to Alternative 1, except that all wetland buffers would be within common open space tracts. The overall number of dwelling units would remain the same as Alternative 1, with a reconfiguration of several lots in the southeastern and southwestern portions of the RHTC zone. The mill site would feature similar uses as Alternative 1, but would include additional open space for shoreline restoration. This alternative assumes that purchase of any portion of the Mill Site for restoration, and any funding of restoration activities, would be accomplished by others. To meet the applicant's objectives under this alternative, purchase of portions of the Mill Site by public agencies or other parties is necessary.

No Action Alternative

The No Action Alternative would include three different scenarios:

- a. *Continuation of existing conditions.*
- b. *Redevelopment by others under existing zoning.* This scenario would assume OPG sells the property and redevelopment would occur in piecemeal fashion by others, including industrial development on the Mill site.
- c. *Redevelopment of upland area under existing zoning and purchase of the entire Mill Site for restoration.* This scenario would assume that purchase of any portion of the Mill Site for restoration, and any funding of restoration activities, would be accomplished by others.

Description of Elements of the Environment to be Evaluated in the SEPA EIS

Kitsap County has identified the following elements of the environment to be analyzed in the Port Gamble Redevelopment Plan EIS. Per SEPA, the EIS will evaluate probable significant impacts from the Proposed Actions and EIS Alternatives (including cumulative impacts), and will identify appropriate mitigation measures. Both construction and post-construction impacts will be assessed.

Earth

- Description of existing topographic, geologic, soil and groundwater conditions on the Port Gamble site and immediately surrounding area.
- Description of source of fill and characteristics of fill material.
- Identify potential geologic hazard areas on the site including steep slope and seismic hazard areas.
- Evaluation of anticipated earthwork (including fill) associated with construction of proposed redevelopment.
- Assess potential for erosion during construction, including shoreline erosion.
- Discuss potential geologic hazard impacts associated with steep slopes, seismic hazards and potential for liquefaction.
- Discuss potential vibration impacts to existing structures on and immediately adjacent to the site resulting from redevelopment activities including construction and truck traffic.
- Analysis of overall suitability of soils to accommodate redevelopment (including both cut and fill).

Air Quality/Greenhouse Gas Emissions

- Describe existing sources of air pollution emissions.
- Describe existing global trends in climate change and greenhouse gases (GHG).
- Describe the existing local, state and federal energy/GHG regulations.
- Qualitative discussion of existing air quality conditions and potential construction and operational impacts
- Calculate the GHG emissions with proposed redevelopment/alternatives.
- Describe the energy usage of the proposed redevelopment, and any features that would reduce energy usage and GHG emissions.

Water Resources

- Describe existing water features on and adjacent to the site (i.e. Hood Canal, Port Gamble Bay, wetlands/streams).
- Describe existing stormwater conveyance system on the site, including outfall(s).
- Describe existing water quality treatment facilities on the site.
- Describe any floodplains and flood hazards on the site.
- Describe existing groundwater patterns and critical aquifer recharge areas beneath the site and in the site vicinity.
- Describe proposed temporary stormwater system(s) on the site.
- Describe proposed permanent stormwater system, including use of outfalls.
- Analyze peak stormwater flows and outfall conditions with redevelopment.
- Discuss potential for proposed fill to affect groundwater patterns and recharge.
- Address use of LID techniques to reduce stormwater runoff
- Assess impact of loss of 100-year floodplain and relationship to applicable requirements and regulations.
- Address potential for groundwater quality and quantity impact from operation of LOSS
- Assess potential for proposed fill and redevelopment to affect floodplain areas on the site.
- Assess potential for surface water quality and quantity impacts during construction and operation of the redevelopment with proposed stormwater systems.
- Description of proposed stormwater quality treatment facilities and comparison of post-redevelopment stormwater quality with existing conditions.

Plants, Animals and Wetlands

- Description of existing upland plant/animal habitat (including wetlands and streams) and animal communities on the site and in the site vicinity.
- Description of existing marine habitat and marine animal communities adjacent to the site and in the vicinity (Port Gamble Bay and Hood Canal).
- Identification of the presence of Endangered Species Act (ESA) threatened, candidate or local species of importance on and in the site vicinity.
- Analyze the potential for impacts to upland plant/animal habitat (including wetlands and streams) from construction and operations of redevelopment.
- Analyze the potential for impacts to marine habitat and marine animal communities adjacent to the site and in the vicinity (Port Gamble Bay and Hood Canal) from construction and operation of redevelopment.
- Analysis of potential impacts to ESA listed species.

- Analysis of impact of proposed redevelopment to coastal process and potential for impact to marine habitat.

Environmental Health

- General description of historic industrial uses on the site and associated areas of contamination.
- Acknowledge the separate ongoing remediation process under the Agreed Order pursuant to the Model Toxics Control Act (MTCA) between Ecology, Pope Resources and Olympic Property Group LLC.
- Discussion of applicable cleanup standards and methods relative to site redevelopment.
- Relationship of redevelopment to the remediation process under MTCA.
- Discussion on the potential for impacts from construction and operational activities of the redevelopment in proximity to areas remediated under the MTCA process.

Aesthetics/Views

- Description of the existing aesthetic character of the site and surrounding area.
- Description of potential viewpoints to the site from the surrounding area.
- Description of existing light and glare conditions on the site and in the site vicinity.
- Description of potential changes in the aesthetic character of the site with redevelopment.
- Discussion of potential view changes from representative viewpoints due to site redevelopment.
- Analysis of potential for light and glare impacts during site redevelopment construction and operation.

Land Use and Plans and Policies

- Description of existing land uses and the land use character of the site and site vicinity.
- Description of the historic level of building development (bulk and scale) and existing buildings on and adjacent to the site.
- Relationship between proposed new uses and existing uses on the site and in the site vicinity, including commercial, residential, and recreational uses.
- Relationship between the bulk and scale of new buildings on the site and historical and existing buildings on the site and in the site vicinity.
- Relationship of the proposal to applicable plans and policies (including the Kitsap County Comprehensive Plan, the Port Gamble Rural Historic Town ordinance (KCC 17.321B; Ord. 236), and the Shoreline Master Program.
- Relationship of proposed redevelopment of the site to broader County GMA goals and future land use patterns.
- Description of proposed uses within the shoreline area with redevelopment and discussion of potential conditions related to public access to the shoreline.
- Potential for proposed development to result in spin-off development and affect the rural character of the area.

Recreation

- Description of existing formal and informal recreational uses on and in the vicinity of the site.

- Description of impacts associated with construction and operations of redevelopment to existing formal and informal recreational uses on the site and in the site vicinity (including increased demand on parks and recreational facilities).
- Description of new recreational opportunities associated with site redevelopment.

Historic and Cultural Resources

- Description of known cultural and archaeological resources on the site and in the site vicinity.
- Description of the architectural history of the site and of the Port Gamble designated National Historic Landmark District.
- Analysis of the potential for impacts to cultural and archaeological resources on the site and in the site vicinity.
- Analysis of the relationship between site redevelopment and the designated National Historic Landmark District.
- Consistency with treaty rights of local tribes.

Transportation

- Description of the existing roadway network on the site and in the site vicinity.
- Description of existing vehicular traffic volumes and intersection and operational conditions for the study area.
- Description of existing accident/safety conditions in the area.
- Description of existing parking conditions on the site.
- Description of existing pedestrian and bicycle facilities on the site and in the site vicinity.
- Description of planned transportation and transit projects in the site vicinity.
- Discussion of transportation infrastructure improvements proposed as part of site redevelopment.
- Analysis of trip generation and traffic distribution associated with site redevelopment.
- Analysis of traffic conditions and LOS at identified intersections.
- Evaluation of proposed parking supply and relationship to anticipated demand.
- Description of proposed non-motorized and pedestrian facilities and connections and their relationship to existing facilities.

Public Services

- Description of existing staffing, equipment and service levels for fire, emergency medical services, police, and schools.
- Description of demands on public services generated by existing site uses.
- Identification of any planned improvements to service facilities.
- Description of existing and projected enrollment and capacity for applicable schools in the North Kitsap School District.
- Identification of any planned improvements to area schools.
- Identification of anticipated new demand for public services generated by site redevelopment.
- Analysis of potential impacts to fire, emergency medical services, police, and schools.
- Identification of any impact fees that would be collected through redevelopment.

Utilities

- Description of existing sewer (including existing sewage treatment plant and outfall), water, electrical and natural gas systems.
- Description of location and size of existing water and sewer lines on the site.
- Description of location and capacity of existing natural gas and electrical systems.
- Identification of any existing utility capacity constraints.
- Evaluation of increased utility demand on water, sewer, natural gas and electrical systems.
- Identification of impacts and necessary infrastructure improvements (including large onsite septic system and relocation/extensions of utilities) to meet new site demands.

Draft Outline of Draft EIS

The following is the intended outline for the Port Gamble Redevelopment Plan Draft EIS. Chapter 3 (III) of the Draft EIS will include the items listed above under the Description of Elements of the Environment to be Evaluated in the SEPA EIS.

FACT SHEET

1. SUMMARY

2. PROJECT DESCRIPTION and ALTERNATIVES

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- 2.2 ENVIRONMENTAL REVIEW PROCESS
- 2.3 SITE DESCRIPTION
- 2.4 OBJECTIVES OF THE PROPOSAL
- 2.5 DESCRIPTION OF THE ALTERNATIVES
- 2.6 SEPARATE ACTIONS
- 2.7 BENEFITS AND DISADVANTAGES OF DEFERRING IMPLEMENTATION OF THE PROPOSAL

3. AFFECTED ENVIRONMENT, SIGNIFICANT IMPACTS, MITIGATION MEASURES and UNAVOIDABLE ADVERSE IMPACTS

- 3.1 EARTH
- 3.2 WATER RESOURCES
- 3.3 PLANTS AND ANIMALS
- 3.4 HISTORIC RESOURCES
- 3.5 CULTURAL RESOURCES
- 3.6 ENVIRONMENTAL HEALTH
- 3.7 AIR QUALITY/GREENHOUSE GASES
- 3.8 LAND USE and RELATIONSHIP to PLANS/POLICIES/REGULATIONS
- 3.9 AESTHETICS/LIGHT AND GLARE
- 3.10 RECREATION
- 3.11 TRANSPORTATION
- 3.12 PUBLIC SERVICES
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REFERENCES

APPENDICES

- A. DISTRIBUTION LIST
- B. TECHNICAL REPORTS

Appendix A

Determination of Significance

NOTICE OF APPLICATION, ENVIRONMENTAL DETERMINATION OF SIGNIFICANCE AND ANNOUNCEMENT OF PUBLIC SCOPING MEETING FOR ENVIRONMENTAL IMPACT STATEMENT (EIS)

Notice is hereby given that the Department of Community Development has recently received applications for the following development proposal. This proposal may be the subject of future public hearings, before the Kitsap County Hearing Examiner, of which separate notice shall be published in this newspaper at least 15 days prior to the public hearing.

PORT GAMBLE REDEVELOPMENT PLAN - PERFORMANCE BASED DEVELOPMENT/PRELIMINARY PLAT, SHORELINE SUBSTANTIAL DEVELOPMENT PERMIT AND CONDITIONAL USE PERMIT

Olympic Property Group, LLC has submitted a Performance Based Development, Preliminary Plan, Shoreline Substantial Development Permit and Conditional Use Permit for the redevelopment of the historic town of Port Gamble. The property includes approximately 319 acres, 114 of which lie within the existing Limited Area of More Intensive Rural Development (LAMIRD) and associated Rural Historic Town zones. Additional surrounding land occurs within the Rural Residential (RR) and Rural Wooded (RW) zones, in North Kitsap County, Commissioner District #1. The proposed request will be served by Kitsap County PUD #1 for water and Large On-Site Sewage Disposal System (LOSS).

Owner of Record: Olympic Property Group, LLC, Sue Allison, 19245 10th Avenue, NE, Poulsbo, 98370.

Project Representative and Engineer: Triad Associates, Ryan Kohlmann, 12112 115th Avenue NE, Kirkland, 98034.

DCD Staff Planner: Jeff Smith at (360) 337-5777.

State Environmental Policy Act (SEPA): Notice of Determination of Significance, request for comments on scope of Environmental Impact Statement (EIS), and announcement of public EIS scoping meeting

EIS Required: As the lead agency under SEPA, Kitsap County has determined this proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c) and will be prepared. Project application materials indicating likely environmental impacts can be reviewed upon request at the Kitsap County Department of Community Development (360-337-5777). The lead agency has preliminarily identified the following key areas for discussion in the EIS: **earth (site grading) water resources (shoreslines, streams, wetlands, groundwater), plants and animals, historic and cultural resources, land use including relationship to plans and policies, recreation, environmental health (relationship to on-going remediation process), traffic, air quality, public services, utilities, aesthetics / light and glare .**

Scoping: Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. You may comment on alternatives, mitigation measures, probable significant adverse impacts, and permits or other approvals that may be required.

Commenting: The following options are available for providing comments on the scope of the EIS:

1. Via e-mail to Environmental Planner David Greetham at dgreetha@co.kitsap.wa.us no later than Wednesday, **March 20, 2013**.

2. In writing to: Kitsap County Department of Community Development, Attn: David Greetham, MS-36, 614 Division St., Port Orchard, WA, 98366. Written comments shall be postmarked by Wednesday, March 20, 2013.

3. In person at the public EIS scoping meeting (details below).

Public EIS Scoping Meeting/Open House: a public EIS scoping meeting/open house will be held to provide an opportunity for the public to learn more about the proposed actions and to provide input into the environmental review process. The meeting will be held **Monday March 18, 2013**, Poulsbo City Hall Council Chambers, 200 NE Moe St., Poulsbo, from **5:00 - 7:00 PM**.

The file(s) pertaining to the above projects are available for public inspection at the Department of Community Development, at the Administration Building, 619 Division Street, Port Orchard, WA 98366, between the hours of 10:00 A.M. and 3:30 P.M. Monday through Thursday, except on holidays. If you have any questions or concerns regarding project proposals, please contact the Department of Community Development Staff Planner indicated above. If you have procedural questions, please contact me at (360) 337-4487. All interested persons are welcome to attend any public hearings that may be held.

To receive further notice in reference to the above project(s), you must notify the Staff Planner listed above, in writing, at the following address: Department of Community Development, Mail Stop 36, 614 Division Street, Port Orchard, WA 98366. OR you may submit the request via e-mail to kashcraf@co.kitsap.wa.us

Kitsap County does not discriminate on the basis of disability. Individuals who require accommodations at the public hearing, or who require information in a different format should contact the DCD ADA Coordinator at (360) 337-7181 (voice) or (TDD) (360) 337-7275 or (800) 816-2782. Please provide two weeks notice for accommodations, if possible. \

KAREN ASHCRAFT, CLERK OF THE KITSAP COUNTY HEARING EXAMINER
www.wa.gov/kitsap/departments/community/he.html

AD#2013

Appendix B

Agencies/Jurisdictions/Entities
Sent DS/EIS Scoping Notice

Federal Agencies

US Navy

State Agencies

WA State Department of Transportation

WA State Department of Ecology

WA State Department of Fish and Wildlife

WA State Department of Natural Resources

WA State Department of Archeology and Historic Preservation

County Agencies/Departments

Kitsap County Public Works

Kitsap County Public Works, Transportation Planning, MS-26

Kitsap County Parks and Recreation, MS-6

Kitsap County Health District

Kitsap County Fire Marshal

Kitsap County SEPA Coordinator

Kitsap County Staff Planner – Jeff Smith

Kitsap County Department of Community Development – Karen Ashcraft

Kitsap County Department of Community Development - Counter

Service Providers

North Kitsap School District #400

Kitsap Public Utility District No. 1 (water purveyor)

Kitsap Transit – Doug Johnson

Kitsap County Fire Protection District No. 18

Puget Sound Energy, Attn: Real Estate

Tribes

Port Gamble S’Klallam Tribe

Suquamish Tribe

Other

Owner – Pope Resources

Applicant – Olympic Property Group, LLC

Engineer/Surveyor/Representative – Triad and Associates

Adjacent Property Owners

800 foot radius plus land owners along SR 104 (the sole transportation route serving the site):

- To the west: SR 104 approximately 1.25 miles west of the town site to Hood Canal bridge, and then continuing approximately 0.5 mile south along SR 3.
- To the south: SR 104 approximately 2.5 miles south of the town site, effectively picking up the entire west shore of Port Gamble Bay.
- To the east: Port Gamble S’Klallam Reservation, and Hood Canal Drive approximately 0.5 mi. north of the north reservation boundary.

Appendix C

Scoping Meeting Transcript

EIS SCOPING MEETING
PORT GAMBLE REDEVELOPMENT

March 18, 2013
5:00 to 7:00 p.m.

Poulsbo City Hall
200 Northeast Moe Street
Poulsbo, Washington

Cheryl A. Smith
CCR 3017

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M E E T I N G A G E N D A

5:00 - 5:45 p.m.
Open House

5:45 - 7:00 p.m.
EIS Overview and Public Comment

* * * * *

P R E S E N T E R S

Mr. Dave Greetham, Environmental Planner
Kitsap County Department of Community Development
614 Division Street, MS-36
Port Orchard, WA 98366

Mr. Jon Rose, President
Olympic Property Group
19950 Seventh Avenue Northeast, Suite 200
Poulsbo, WA 98370

Mr. Rich Schipanski, Manager
EA Engineering, Science and Technology
720 Sixth Street South, Suite 100
Kirkland, WA 98033

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A P P E A R A N C E S

KITSAP COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT

Dave Greetham, Environmental Planner
Jeff Smith, Land-Use Planner
Patty Charnas, Environmental Programs Manager

EA ENGINEERING, SCIENCE AND TECHNOLOGY

Rich Schipanski, Manager

OLYMPIC PROPERTY GROUP

Jon Rose, President

* * * * *

P R E S E N T A T I O N

Page

Welcome and Introductions 5
Dave Greetham

Applicant Overview of Proposal 7
Jon Rose

EIS Process 14
Rich Schipanski

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P U B L I C Q U E S T I O N S

Public Member Questions

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* * * * *

P U B L I C C O M M E N T S

Ron Eber
Mark Barabasz
Lou Foritano
Brian Kilpatrick
Craig Jacobrown
Dave Haley
Christine Castigliano
John Willott

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* * * * *

1 [Meeting Presentation and Comments Begin at 5:15 p.m.]

2

3 MR. DAVE GREETHAM: Good evening, friends. My
4 name is Dave Greetham. I'm an environmental planner with
5 Kitsap County Department of Community Development. Thanks
6 for coming in on a nice sunny -- well, sort of sunny
7 evening.

8 The reason we're here tonight is the Port Gamble
9 redevelopment project. We all know that. The real reason
10 we're here is you're going to help the county decide what
11 kind of environmental issues need to be studied in the
12 environmental impact statement, or EIS, for the project.

13 So we're very early in the project. We're going
14 to go through this environmental impact statement first,
15 then it will go on to public hearings/decision-maker stage
16 at a later time.

17 So in the corner many of you have signed in.
18 You can sign your mailing address and/or e-mail to get on
19 the mailing list. You can sign up to speak tonight if
20 you'd like to provide input on what we should be studying
21 in the EIS. And we'll keep you informed of major points
22 in the process if you sign up on that list. And if you
23 haven't yet, feel free to on your way out or a little bit
24 later.

25 Around the room there are a couple of blowups in

1 color of the site plans. One is called "preferred plan,"
2 one is called "alternative plan." The preferred plan has
3 a little less intensive development on the point there at
4 the mill site. The alternative plan has more development
5 on the mill site.

6 There are two handouts to the right of that on
7 the table. You can grab those or any handouts you see
8 tonight.

9 Again, my name is Dave Greetham. I'm the
10 environmental planner for the EIS process. I'd like to
11 introduce my colleague, Jeff Smith. He will be the
12 land-use planner as this goes through the project. So we
13 do the environmental review, Dave; land-use planning
14 before it goes to public hearing, Jeff Smith.

15 I'd like to introduce my planning environmental
16 programs manager, Patty Charnas, behind me here.

17 North Kitsap District 1 Commissioner Robert
18 Gelder is with us tonight. Comments or are you just here
19 to observe?

20 MR. ROBERT GELDER: Just here to observe.

21 MR. DAVE GREETHAM: Okay.

22 And with that, I'm going to introduce -- we're
23 going to have a couple folks for a presentation, then
24 we'll get into public comment and input on the EIS.

25 So our brief presentation will be two parts:

1 Jon Rose with Olympic Property Group will provide an
2 overview of what the applicant is proposing so we'll all
3 learn together what's being proposed, and then I'll
4 introduce Rich Schipanski from EA Engineering Consultants
5 who is going to be preparing the EIS. They are
6 specialists in the environmental process, and the EIS is
7 prepared at the county's direction. We're responsible for
8 the documents. We've consulted with an independent third
9 party to help us with that process, and you're going to
10 help us as well. Thanks again for coming.

11 Mr. Rose.

12 And I'm going to see if I can get the lights
13 dimmed here.

14 MR. JON ROSE: Good afternoon -- or good
15 evening, ladies and gentlemen. I'm Jon Rose, president of
16 Olympic Property Group.

17 I'm going to have a very brief session for once
18 and just talk about just what is the project so that's
19 well understood and then let the county go from here. The
20 main point of this meeting is to advise the county and
21 give comments on what should be studied during the
22 environmental impact statement process, what studies they
23 should do. And my part is to make sure that the project
24 itself is well understood by you and by others so you'll
25 know what you're commenting on.

1 So the next set of slides is kind of a
2 yesterday, today and tomorrow. This slide was taken
3 probably around the 1940's. As you can see, the mill site
4 was very full and very intensely covered. The mill site
5 itself is about 26 acres, and it was solely dedicated to
6 lumber production. Most of the site is impervious, and
7 there was probably about two acres of dock and overwater
8 coverage back at that time. If you add the amount of log
9 rafting that used to be done, there was probably another
10 eight to ten acres of overwater cover with the log rafting
11 that happened back in the day. Next slide.

12 That is an overview of sort of the main portion
13 of the mill and showing the burner stack, and across the
14 way it would be the Hansville Peninsula. Next slide.

15 At its peak, Port Gamble had about 800 people
16 living in it. And when the automobile was introduced,
17 which was at the same time we had the service station --
18 the service station that you see up there was from 1920 --
19 it really marked the decline in the town as people began
20 the process of commuting. Since mill worker families
21 could not own homes inside the town, they now had the
22 ability to start commuting to buy their own properties
23 outside of town, and so the homes themselves became less
24 and less used and less and less important. Next.

25 This is a snapshot of the mill site as it is

1 today. In front of you at the very foreground is the
2 wharf that was the main wharf where three-, four- and
3 five-masted ships sailed into Port Gamble, loaded up on
4 lumber, and took that lumber all over the world.

5 A secondary process that is related but is a
6 different process is the environmental cleanup. And if
7 you've read the newspaper at least once in the last four
8 months, you've caught some of the flavor of the
9 environmental cleanup project that's going on. That's not
10 part of the subject tonight, but it is important for you
11 to know that that environmental cleanup is happening, and
12 Pope Resources has fully embraced it. And by the time
13 this project is done, all of the 1,800 creosoted piles
14 that you're looking at and all of the overwater structure
15 that you're looking at will all be removed.

16 And that's one of the reasons it took us since
17 1995 to get this master plan in the door is we wanted to
18 make sure we didn't submit the project until after we were
19 fully aware of what was going to be required for the
20 environmental cleanup. That cleanup started in 2002, and
21 we've been going at it now for 11 years. But the very
22 biggest part of that, which is cleanup of Gamble Bay and
23 wood waste in the sediments -- which is the primary issue
24 of concern is wood waste from the chip mill and from
25 sawdust. You know, that occurs in large measure right

1 around the mill site, but there's evidence of it
2 throughout the bay.

3 There is also evidence from the creosoted
4 pilings. The pilings, every busy port in Washington State
5 has creosoted piling. All of the bays show contamination
6 from creosoted pilings. Liberty Bay does, Miller Bay
7 does. All of our urbanized waterfronts show that
8 evidence.

9 I think Port Gamble is probably going through
10 the most complete cleanup and removal of 99 to 100 percent
11 of all those pilings through our cleanup effort and
12 remediation of that wood waste. So all of that is going
13 to get hammered out -- has been hammered out and will
14 happen, but it's not part of what we're here to talk about
15 tonight. Next.

16 This slide is great because it really gives you
17 a view of the property that is inside this current
18 application. There are 200-plus acres that are being
19 applied for under this application. Half of those acres
20 are going to be an open space, and most of the development
21 is going to happen either on the mill site, which you see
22 in front of you, or in the town which is represented by
23 all the green lawn areas.

24 To the south and down the shoreline a little bit
25 you can see an area that's also mostly covered in meadow.

1 That's also part of the development that we're talking
2 about this evening.

3 We haven't called for housing there and we're
4 not entirely certain of a final plan there, but that's one
5 of the areas we think it was important to put in this
6 master plan because its potential uses include things like
7 a campground, RV park, a place to stage equestrian rides,
8 a parking lot so people can access the 4,000 acres of
9 trail. And we wanted to control that to be sure that kind
10 of amenity wasn't left to a committee, and so we included
11 that in our plan.

12 Up on the hill you'll see another green area,
13 and that's the Babcock farm. The Babcock family was
14 originally from Maine. They came to the West Coast to be
15 part of Port Gamble. The Babcock family owned property
16 out there until 2006. We bought the farm back from the
17 Babcock family to complete and reassemble the property.
18 And now that portion of the property, along with about an
19 acre of greenhouse, forms a very important part of the
20 Port Gamble master plan, and that's our agrarian district
21 where the master plan will call for things like continued
22 farming, agriculture, small-scale agriculture, tourism and
23 industrial -- agricultural businesses and then
24 tourism-related agriculture such as a winery at the top of
25 the hill and other facilities that would go along with

1 that.

2 So up on that hill and just outside of the
3 fields -- all the fields will be preserved as agricultural
4 space. Outside of that area there will be some
5 development of about ten homes and then all these
6 agricultural uses that I spoke about.

7 As part of the environmental cleanup, the
8 wastewater treatment plant system currently outlets into
9 Hood Canal. Like almost all wastewater treatment plants
10 up to ten years ago, including many of the counties and
11 most of the counties, it discharges into Puget Sound after
12 receiving secondary treatment, in some cases tertiary
13 treatment.

14 Part of our environmental cleanup is the State
15 wanted to be sure, as part of the cleanup, that that
16 outfall was removed. It's one of the last outfalls. It's
17 not the last, but it's one of the last outfalls in Hood
18 Canal. So it's part of that process. That's going to be
19 abandoned, and that effluent from the wastewater treatment
20 plant that currently goes to the wastewater treatment
21 plant will then be pumped up to the hill in back of that
22 agrarian area in back of the farm. And that will be a
23 large on-site septic system or drain field system.

24 In that particular location in Port Gamble,
25 there is a great deal of what's called recessional

1 outwash, and that is a very, very thick layer of sand and
2 gravel that are very favorable to disposal through a large
3 on-site septic system.

4 With that, you're going to see two plans talked
5 about tonight. This is our preferred plan. And this plan
6 reflects some conversations we've been having with the
7 Department of Ecology whereby they have been interested in
8 bolstering the effect of the cleanup by purchasing some of
9 the land on the mill site. And so we've been in that
10 conversation with Ecology for over a year.

11 And the idea of this preferred plan is there are
12 approximately eight acres that Ecology has expressed an
13 interest in buying for open space. So it's not acres
14 we're giving away to be nice guys. It's acres that
15 Ecology has said, "We want to make this cleanup project,"
16 which is a \$17 million cleanup project, "a real
17 whiz-bang." And so they've offered to provide funding in
18 the past for 480 acres on the -- inside Port Gamble Bay
19 that we own, and offered to buy part of the development so
20 that there's improved and increased buffers on the mill
21 site.

22 We are still in negotiations, if you followed at
23 all, with Ecology. This is our preferred outcome. But if
24 it doesn't happen, and we couldn't take the chance of not
25 knowing before our vesting period came due, we have an

1 alternate plan. Next.

2 The alternate plan has much smaller buffers and
3 more development. And so the project itself is the same
4 in every respect except for the area of that eight acres
5 that Ecology has expressed an interest in the past in
6 purchasing. Otherwise, the two plans are identical.

7 This is really the county's meeting. This is
8 not our meeting. I'm going to wrap up. But we will be
9 hanging around the open house part of that. If you have
10 questions for either my staff or I, we'll be happy to
11 field those. Thanks very much.

12 MR. DAVE GREETHAM: Thanks, Jon. That was an
13 informative overview.

14 So that brings us to where we are today. The
15 State Environmental Policy Act, or SEPA, is the process
16 that helps us sort out the impacts of these alternatives.
17 So that's where the EIS consultant comes in. I'd like to
18 introduce Rich Schipanski. And also Karen from EA is here
19 and a couple folks from Triad, if you can raise your
20 hands. They can answer questions. They're the
21 engineering firm that have prepared the application and
22 site plans.

23 Thank you.

24 MR. RICH SCHIPANSKI: Thanks, Dave.

25 So as Dave mentioned, SEPA stands for the State

1 Environmental Policy Act, and it's the law that directs
2 that agencies consider the environmental impacts of
3 development projects. SEPA also identifies agencies that
4 will lead that responsibility. And in this case the lead
5 agency is Kitsap County. And Kitsap County has
6 determined, after reviewing the application, that an
7 environmental impact statement be prepared and that that
8 process be followed for this project.

9 An environmental impact statement is a document
10 required by SEPA for projects that have the potential to
11 result in significant impacts. And the purpose of the EIS
12 as well as all of SEPA is to inform the decision makers.
13 The EIS is not in itself a decision-making document. It
14 is an informative document for the public agencies and
15 ultimately for the decision makers.

16 The major steps in the EIS process, there's
17 three of them. The first one is scoping, which is where
18 we are right now. And there's a 21-day scoping period
19 where comments from the public and agencies are received
20 and considered by the lead agency to help define the scope
21 for the environmental impact statement.

22 The environmental impact statement itself has
23 two components. The first is the draft EIS which will
24 take the comments and take the input that we've received
25 during the scoping period and we'll develop a draft EIS

1 which will talk about impacts and potential mitigation
2 associated with elements of the environment, which I'll
3 touch on briefly. But the draft EIS is then issued, and
4 it goes out for public comment for a 30- or a 45-day
5 comment period. These comments are then considered and
6 responded to in the final EIS. The draft and the final
7 EIS, those two components make up the environmental impact
8 statement, and then that is used by the lead agency, here
9 Kitsap County, in the decision-making process.

10 At this point the county has -- Kitsap County
11 has identified elements of the environment that it has
12 anticipated at this point will be analyzed in the EIS.
13 They're listed out on the boards. I think we have a
14 handout there that lists them. But very briefly, Earth,
15 geotech; landslide potentials, seismic, that kind of
16 thing; water resources, surface water, groundwater; plants
17 and animals including wetlands and streams; historic and
18 cultural; of course, land use and the relationship to the
19 Kitsap County code; recreation; environmental health.

20 Jon touched on it. The EIS will describe the
21 process that is undergoing for environmental cleanup and
22 how the site development would relate to that.
23 Transportation; air quality; public services including
24 schools and fire, police; utilities; and aesthetics and
25 light and glare. And those are the elements of the

1 environment that are preliminarily identified.

2 The EIS will also consider alternatives. SEPA
3 requires that, at a minimum, the EIS look at the proposal
4 and the no-action alternative, but may also look at design
5 alternatives. And at this point, the alternatives have
6 not been completely defined. Waiting till the end of the
7 scoping period. But obviously, we have two development
8 proposals that have been submitted as part of the
9 application.

10 And so as Dave mentioned, the purpose of scoping
11 and the purpose of this meeting is to gather comments from
12 the public. The comment period is open until Wednesday
13 the 20th, but this meeting gives people an opportunity to
14 provide oral comments and/or written comments and to just
15 understand a little bit of the process.

16 MR. DAVE GREETHAM: Thanks, Rich.

17 Yes. And there are three ways to submit
18 comments. Maybe four. Verbally tonight. We have a court
19 reporter over here that's recording comments. We have
20 comment sheets on the table. You can e-mail comments to
21 me. There's information on the sheets to e-mail them
22 directly to me by the end of the day Wednesday. Or you
23 can mail them in and postmark them Wednesday. And any of
24 those methods work. Your choice.

25 I think if we could try to keep our comments to

1 about three minutes apiece, that will give folks a chance.
2 How many folks want to speak tonight, very roughly? Okay.
3 Well, there's a little latitude then. Not everybody's
4 going to speak. So there's some latitude in your time.
5 but just be mindful of your time.

6 Yes, Betsy.

7 MS. BETSY COOPER: Will you have time for some
8 clarifying questions just before we start?

9 MR. DAVE GREETHAM: Betsy asked if we have time
10 for clarifying questions, and we do have the experts in
11 the room. If it's a SEPA question, I can tackle it or
12 Rich. And if it's a site-plan question, if it would help
13 with your comments, we'd be glad to entertain a question
14 or two first. Go ahead.

15 MS. BETSY COOPER: A basic question. It appears
16 the materials that were provided on the sheets are on the
17 mill site, but I just wonder, can you clarify on that
18 where are the places where Jon was describing the Babcock
19 farm and the meadow and what those . . .

20 MR. DAVE GREETHAM: Sure. So there's some
21 questions about, and maybe our Triad can come and answer a
22 couple of these questions about some of the specific -- or
23 is Jon in the room still? There you are. Sorry, Jon. I
24 didn't see you.

25 Jon, do you want to answer a couple of questions

1 about specific locations of projects?

2 MR. JON ROSE: Do you want me to come up there?

3 MR. DAVE GREETHAM: Yeah. Come on up.

4 MR. JON ROSE: Or elements of the project.

5 So, Betsy, the area where we talked about, sort
6 of the activity center that was south of town is right
7 here. The area of the Babcock farm is generally right
8 here. The large on-site septic system is here. All of
9 this dark green is open space. There are some extremely
10 large wetlands, and all of that has been sort of clustered
11 in an open space that will be contiguous with the Kitsap
12 Forest and Bay Project.

13 And then, you know, largely outside of the mill
14 site, this whole area here, all of that -- except for the
15 downtown, all of this area is residential. And then this
16 is commercial. And that's going to consist mostly of
17 infill, so there's a lot of green space there. There's
18 going to be quite a bit of infill inside the town center.

19 And then this is the mill site development.
20 This portion from here south is residential. The idea of
21 putting residential there, we have -- the mill site zoning
22 allows us to do everything up to and including a new
23 sawmill. That's the zoning that we have today. But it
24 also allows for a mix of uses. And so the strategy was to
25 put the quieter uses further inside the bay and maybe more

1 commercial uses on the mill site more towards the outside
2 of the bay.

3 So this is residential. This is shops. This is
4 a hotel and conference center. And this is the area that
5 we have always hoped to get a marine science center.
6 We've had quite a bit of interest over the years from
7 different universities and also from different aquaculture
8 folks to do a marine science in that location.

9 Any other questions on geography?

10 MS. BETSY COOPER: Well, maybe others have it,
11 but basically, I was just curious. When you say "the
12 activity center," what kinds of uses could potentially
13 occur?

14 MR. JON ROSE: So potentially campground,
15 staging for equestrian rides, staging for our activities
16 that are up in the town, you know, all the crazy things
17 that we do with concerts and medieval and Civil War and
18 all that stuff, you know. The real estate in the town is
19 way too valuable to just kind of hold a circus, but we
20 didn't want to lose them, and that may be a spot for that.

21 Also, you know, we still have a desire to do
22 education. I would love to see a Montessori, or an
23 elementary school in that location would be perfect for
24 us.

25 MS. BETSY COOPER: In the paper I've been

1 reading about wanting to do a marina. Is that still
2 (inaudible)?

3 MR. JON ROSE: No. There is no marina proposed.
4 We're not proposing a marina. We are proposing a dock
5 that is -- the float part itself would be 150 feet long.
6 We would limit it to less than ten boats at any one time
7 because that turns into the definition of a marina which
8 includes shellfish closures. And if the dock is limited
9 to less than ten boats, it's a dock and not a marina by
10 the Department of Health, and that will preclude an
11 automatic regulatory shellfish closure. So long ago we
12 announced we would limit the dock use so it would not
13 close shellfish beds.

14 MR. LOU FORITANO: Maybe today, as I know Dave
15 is aware because he led the project, we've come through a
16 multiyear shoreline management program which required an
17 inch-by-inch survey of three sides of this project, all
18 the water sides. Will all that information inform, affect
19 EIS, or will the activities of the EIS be redundant as to
20 what will probably be and already has been the most
21 contentious part of this application?

22 MR. JON ROSE: So I'll do one part of that and
23 then Dave will give his.

24 Although the shoreline management plan studied
25 every inch, it only studied it at a depth -- you know,

1 this much depth for every inch of shoreline. This project
2 will take that level of study for this piece of the
3 shoreline and grow it by this much. So by the time this
4 EIS is done, there will be at least eight inches of
5 different studies that will be much more focused on this
6 particular shoreline and that particular development.

7 MR. DAVE GREETHAM: And really, just to
8 acknowledge Lou's comment, the county did a shoreline
9 inventory and characterization of the entire shoreline for
10 the shoreline master program update. So even though this
11 project is vested under current shoreline and land-use
12 regulations rather than the new SMP that's upcoming, the
13 scientific and background information we gleaned from the
14 characterization can be provided to the consultant for
15 this project. So it's good, valid, current information.
16 Thanks.

17 Any other clarifying questions before we go into
18 our testimony and feedback on the EIS? Ron.

19 MR. RON EBER: I was curious because I don't
20 know this master plan or whatever you call it, development
21 project which goes after the EIS. But Jon was talking
22 about they're proposing residential, but the zoning allows
23 a lot more. So when you're at the end of this process to
24 improve something that you say this is residential, is
25 that what it has to be? Or did they then have the option

1 of going, "Oh, you've approved this but the zoning allows
2 something else," and then they file a subsequent
3 application to do something else under the zoning?

4 MR. DAVE GREETHAM: Yeah. Fair question. Our
5 land-use planner, Jeff Smith, and I were discussing this.
6 Sometimes that's locked in through a developer's
7 agreement, other times it's defined in what the hearing
8 examiner approves. I think the application is very clear
9 that's been submitted as to what they would like to occur
10 in each tract.

11 Presumably, if there's not a separate
12 developer's agreement, the hearing examiner will be ruling
13 on what's described in their application for each of those
14 tracts. And if you've read their application materials,
15 which we'll provide gladly upon request at the county,
16 they very clearly describe in each tract what is on in the
17 application for that tract. And so presumably, the
18 land-use planner, when he's writing a staff report, and
19 the hearing examiner making a future decision will be
20 conditioning it on that proposal.

21 Jeff, anything you want to add to that?

22 MR. JEFF SMITH: You're fine.

23 MR. DAVE GREETHAM: Okay.

24 All right. I think we're to the -- oh, yeah.

25 Yes.

1 AUDIENCE MEMBER: Can we put up the preferred
2 plan instead of the alternative plan where we really focus
3 on because it is the preferred plan?

4 MR. DAVE GREETHAM: So the question was, can we
5 put the preferred plan, which is now on the screen. And
6 you recall the primary difference is the band of open
7 space along the shoreline in the preferred plan.

8 AUDIENCE MEMBER: Well, I was looking for that
9 to be the primary difference. But as I look at the
10 preferred plan, it's also a lot less intensive on the
11 north shore there. When you go to the alternative plan,
12 you've got a lot of residential development on the acreage
13 that's in negotiation now. And I don't exactly know how
14 that's going to be resolved, but you also get a lot more
15 intensive building footprints on the north shore. Why is
16 that connected? Why wouldn't the alternative plan simply
17 deal with that eastern shore?

18 MR. DAVE GREETHAM: So the question really ties
19 into how we approach this EIS process. One thing we're
20 going to do -- the question was, why is the alternative
21 plan more intensive in some areas, basically.

22 AUDIENCE MEMBER: Well, in areas that aren't the
23 subject of the Department of Ecology negotiations.

24 MR. DAVE GREETHAM: Sure. There's no answer to
25 that yet, but part of our role moving forward is going to

1 be to narrow down the scope of the alternative. So an EIS
2 process has to provide reasonable alternatives for the
3 decision maker. We haven't finalized those alternatives
4 yet.

5 So your question's good. We haven't quite
6 gotten there. We'll be working after the comment period
7 with the consultant to make sure we discussed the whole
8 range of impacts from more intensive to less intensive.

9 I can't speak as to why the applicant proposed
10 certain things. But that's what we've accepted as their
11 application at this time, but not necessarily what the
12 final result will be, of course. In other words, the EIS
13 process is going to hone down a no-action alternative, a
14 preferred alternative, and one or two other alternatives
15 so a decision maker can look at the impacts of each of
16 those.

17 Ron.

18 MR. RON EBER: Another angle on this, so the EIS
19 is going to look at impacts of the preferred alternative
20 and the other -- and the other alternative and maybe some
21 other options including no build to inform the decision
22 maker. But what then in -- it seems like that will be
23 real interesting, but we're liable to end up with a whole
24 other alternative based on the hearing examiner and how
25 the applicant proposes in response to all that. So the

1 alternatives looked at, in other words, are not what may
2 finally be approved, A or B. It may be some combination
3 thereof based on later stages in the process?

4 MR. DAVE GREETHAM: Sure. So the question is
5 basically what is the alternative's change. The
6 requirement under the State SEPA law is that whatever is
7 proposed is within the range of alternatives discussed.
8 In other words, the high end of impact we analyze in this
9 document that's going to come from this process and the
10 low end, anything that goes above and beyond that has to
11 be reopened. The EIS has to have an addendum discussing
12 that additional impact. So anything can be considered
13 within that range of alternatives. And that's one of the
14 intents of SEPA, to give you sort of a range. And, again,
15 the decision makers can sort of look at the effects of
16 each of those within that range.

17 Betsy, you had another question.

18 MS. BETSY COOPER: Yeah. I have one other. At
19 this point the zoning in all these different areas would
20 not necessarily allow uses to be (inaudible). So will the
21 EIS be looking at the specific zoning changes, as well?

22 MR. DAVE GREETHAM: So the question was, does
23 this involve zoning changes. Actually, the zoning is in
24 place. In approximately 2000 the county zoning code and
25 any subsequent comprehensive plans were revised for the

1 rural historic town zone. And within that RHT, or rural
2 historic town, there's a range of uses: waterfront,
3 residential, commercial. So there's no zoning change
4 proposed. This is anticipated in the current zoning code
5 for Kitsap County.

6 MS. BETSY COOPER: So just to follow up quickly,
7 is the whole area that you just described with the meadow,
8 activity zone and all that in the rural --

9 MR. DAVE GREETHAM: No. So the question was, is
10 the activity area on the south end of the -- the picture,
11 at the bottom of the picture within the rural historic
12 town. Some of this project extends south of the rural
13 historic town boundary into the rural wooded and rural
14 residential zones. Those also are not proposed for
15 rezoning.

16 Am I correct, Jeff? There's no rezone involved,
17 right?

18 MR. JEFF SMITH: That's correct.

19 MR. DAVE GREETHAM: So anything that's proposed
20 is within the allowed zoning in the county's code today.

21 MS. BETSY COOPER: Even that area of the Babcock
22 farm?

23 MR. DAVE GREETHAM: Yes.

24 MS. BETSY COOPER: So you're saying that all
25 those things are within the existing zoning now?

1 MR. DAVE GREETHAM: Yeah. So the 2000 language
2 was very detailed, and it really anticipated a lot of
3 these types of uses. What it didn't get into, of course,
4 was the environmental impacts of each of the uses, and
5 that's our main role moving forward.

6 And maybe that's a good time for some testimony.
7 I think we have a list of folks who would like to speak on
8 the contents of the EIS. And we've got your addresses on
9 here, but if you could at least spell your name for the
10 court reporter, that would be helpful.

11 The first person on our list is Lynn Schorn. Is
12 Lynn here? Come on up, Lynn. Do you want to speak, Lynn?

13 MS. LYNN SCHORN: I didn't know I signed up.

14 MR. DAVE GREETHAM: That's okay. You don't have
15 to. I have you as a yes on the box, but I'll just take
16 that as a mistake if you didn't want to speak.

17 Next up, a question mark, Ron Eber. Did you
18 want to speak, Ron?

19 MR. RON EBER: Yeah.

20 MR. DAVE GREETHAM: Come on up.

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1 R O N E B E R

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3 MR. RON EBER: Ron Eber, E-B-E-R, Box 249, Port
4 Gamble.

5 A couple of quick thoughts that strike me, broad
6 topics because I think the list is fairly comprehensive
7 but some of these are subparts within that. I think the
8 impacts on Port Gamble Bay are very important in terms of
9 water quality, and what I didn't see on the list was
10 fisheries, an impact to the fishery, which is real
11 important. Also, access and the issue of nonpoint source
12 pollution that may be increased from additional paving and
13 hard surfaces and building surfaces that will go in under
14 the existing zoning.

15 Some of this may have been resolved by Mr. Rose.
16 There's been lots of talk about docks versus marina, so it
17 sounds like the outer range being proposed is a dock, not
18 a marine. But the size, the number of boats, and, again,
19 impact on fisheries and water quality both directly from
20 the dock and from any boats that go there. But some of
21 that concern me be resolved.

22 Probably the biggest thing that comes to mind,
23 you have a traffic -- transportation. And it's not just
24 the number of new cars. But that turn is real tight
25 there. It's a state highway. There's tremendous amount

1 of through traffic that's always going to the bridge and
2 not coming through Port Gamble. And with more houses
3 there, you're going to have more people, left and right
4 turns. And I can see a big problem with the traffic flow
5 on the state highway being slowed down.

6 There's been talk, I think it's on one of the
7 maps, of eventually being a bypass. Mr. Rose has talked
8 about that at some of his public meetings that something
9 that would be considered down the line, I think, is one of
10 the alternatives is to think about the impact of
11 separating the through traffic that's going to the Hood
12 Canal Bridge and the Olympic Peninsula, particularly in
13 the summertime, and what happens when the bridge opens and
14 closes from people who are just trying to go into Port
15 Gamble either to the commercial area or because they're
16 now living there.

17 Finally, the issue of historic quality was
18 mentioned that I think the high point population was 800
19 people at one time and there was some existing historic
20 pattern of where the houses were is to compare that with
21 what's being proposed. I don't know what the ultimate
22 population is going to be. But how does that affect the
23 historical quality in terms of building structure, design,
24 spacing and fits under that historical designation that I
25 think both the State and the federal government have

1 designated the area?

2 So those are just some quick looks and thoughts.

3 MR. DAVE GREETHAM: Thanks, Ron.

4 Dave Haley.

5 MR. DAVE HALEY: I wanted the opportunity to ask
6 questions if something came up, but I haven't heard
7 anything I want to ask a question on. I'll be sending you
8 an e-mail.

9 MR. DAVE GREETHAM: Thank you, Dave.

10 Next up we have Mark, and I'm sorry,

11 B-A-R-A-B --

12 MR. MARK BARABASZ: Barabasz.

13 MR. DAVE GREETHAM: Thanks, Mark.

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1 M A R K B A R A B A S Z

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3 MR. MARK BARABASZ: Mark Barabasz,
4 B-A-R-A-B-A-S-Z. I live in Hansville.

5 Before I read my comment, there's something that
6 was just said about historical. And I just wanted to
7 mention that the history of that area goes back far more
8 than 150 years, and that would be something that maybe you
9 guys would want to consider, as well.

10 So anyway, I live in Driftwood Key, and it's
11 just north of Port Gamble Bay. And as we know, Port
12 Gamble has a lot of businesses, vehicle traffic,
13 commercial enterprises, all of which generate a lot of
14 waste. And there's impervious surfaces there, and there
15 are more coming according to the plans that I've been
16 reading about. I just want to compare that to where I
17 live a little bit before I get to my real point here.

18 So my home is on a small postage stamp sized
19 lot. My backyard borders a small ditch that runs through
20 several backyards to a culvert which empties into Hood
21 Canal. There's no traffic in my backyard, there are no
22 businesses, no commercial or industrial enterprises. It's
23 a lawn with a ditch. And that ditch is bordered on both
24 sides by 25 feet of clearance to which I can't extend my
25 lawn per county rules.

1 Last year a county land-use supervisor explained
2 to me with careful detail, and I appreciated that, why I
3 cannot extend my lawn or put in a garden even. I'm only
4 allowed to put in native species of vegetation. I cannot
5 remove any of the existing vegetation except the
6 blackberry bushes.

7 He explained to me that this ditch is actually a
8 seasonal stream. It gets that designation because the
9 runoff from it in the several yards it goes through is
10 channeled into a culvert which empties into Hood Canal.
11 As such, and I'm now under the jurisdiction of county,
12 state and federal agencies. I'm just a little homeowner
13 here. And it was stressed to me that I need to follow
14 these guidelines or be subject to fines. And I was not
15 offered any mitigation alternatives. That's at the county
16 level. I can't even imagine state and federal, what I'd
17 be subject to if I didn't follow the guidelines.

18 Now, this impressed me, and I liked it. This is
19 good. I appreciate all of that, and I applaud the county
20 and every other agency that wants to keep this place
21 clean. Now, there are a lot more people more up on the
22 technical details of things, and they're going to be
23 giving a lot of statements about that, about what should
24 be reviewed for this EIS and the dangers to Hood Canal and
25 Gamble Bay. But a couple other things that I'll just

1 point out. Gamble Bay has the second-largest population
2 of herring in the whole of Puget Sound. It's a very
3 important food for an endangered species of salmon.
4 That's only one area that will be impacted, and it's an
5 important one. As mentioned earlier by Mr. Eber, our
6 fisheries are in dire straits these days.

7 And, you know, globally, we are becoming more
8 aware of local activities and the impact that they have.
9 We have seen recently radioactive debris in Washington
10 shores from poor ecological practices thousands of miles
11 away just last year. I'm fully conscious of the risk that
12 my lawn poses to Hood Canal, and you can bet that I'm not
13 going to take any part in causing any of the destruction
14 of Hood Canal. It won't happen.

15 I'm also fairly certain that the risks my lawn
16 presents pale in comparison to what OPG is planning. And
17 all I ask is that this board simply apply the same
18 stringent methods to your permitting that you apply to me.

19 Thank you.

20 MR. DAVE GREETHAM: Thanks for the comments,
21 Mark.

22 Next up will be Lou Foritano.

23 And while Lou's coming up here, Ron's and Mark's
24 comments remind me of another element to this review
25 that's occurring. We've also sent this project to State

1 agencies for review. That includes Fish and Wildlife,
2 Ecology, Department of Transportation per Ron's comments,
3 and also the local tribes. So while we're getting your
4 input, we're also getting input from those agencies and
5 tribes at the same time.

6 Thank you.

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1 L O U F O R I T A N O

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3 MR. LOU FORITANO: Good evening, all. I'm Lou
4 Foritano. And the address information is there.

5 My property, interesting enough, in terms of the
6 prior speaker sits between his home and Driftwood Key and
7 the Port Gamble S'Klallam tribe, which is half a mile to
8 myself also on the water. If my arm were better, I could
9 throw a rock across Hood Canal and hit where the
10 convention center of the perspective Port Gamble project
11 preferred plan will be. So I am as conscious as anyone
12 who lives on that water about what happens in Port Gamble,
13 and certainly what happens to the water. I regularly
14 watch dozens of fishing boats principally from the tribe
15 and enjoy them as I do the wildlife and the eagles.

16 But just for the sake of balance, I'd like to
17 offer a different perspective, and that perspective has to
18 do with speaking in strong support of the development of
19 Port Gamble. Having also been a volunteer on the planning
20 process for Kitsap County for six years, I know how
21 planning works, how land use works a bit. I know the kind
22 of scrutiny that basic plans, homeowner plans, commercial
23 plans undergo. And my sense is, and all it is is a sense
24 and a perspective, is that there will be no project that
25 will undergo the degree of scrutiny as it relates to the

1 concerns expressed by the prior speakers than this one.

2 EIS is big enough, the county oversight with all
3 the State is big enough, and the State agency oversight is
4 on top of that. And if that doesn't work, I can assure
5 you, because we've seen it already, the tribes will be all
6 over any attempt to do damage to the waterways that serve
7 their needs and their interests.

8 The thing I think that makes this project
9 different is that Port Gamble is unique. It's unique not
10 just because of what it's called. It's unique in terms of
11 the needs of this county to have something. We don't have
12 a Port Townsend. We have a Poulsbo. We have a Port
13 Orchard. We have a ferry destination called Kingston.
14 Port Gamble is something that could be extraordinarily
15 special if it's done right.

16 And my ten years of living here, which isn't as
17 long as some of you, and my experience with my neighbor
18 across the water, and that's the Olympic Property Group,
19 has been extraordinarily positive. And I say that as
20 somebody who spent 30 years in the business world and
21 could not think any more poorly about most corporations
22 that exist in this country. My attitude is negative about
23 business, and I'm from that world. It is not about what
24 I've seen by way of the behavior of the Olympic Property
25 Group, and Jon in particular.

1 So my vote will be -- assuming all the
2 conditions and practices and prohibitions are in place,
3 everyone has a chance to say their piece for the proper
4 re-creation of this beautiful town. As long as Jon
5 doesn't put a Ferris wheel where I can see it from my
6 bedroom window.

7 MR. DAVE GREETHAM: Thanks, Lou.

8 Next up, Brian Kilpatrick.

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1 B R I A N K I L P A T R I C K

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3 MR. BRIAN KILPATRICK: Brian with an "I,"
4 K-I-L-P-A-T-R-I-C-K.

5 I won't be as eloquent as this gentleman. I'm a
6 mountain biker, and Port Gamble is a town that's
7 fantastic. The open space is fantastic. But Port Gamble
8 without the open space is like a balloon without air. And
9 so many users use this property. And I want to thank OPG
10 for that use. It's just fantastic. Hundreds of people
11 use this every week.

12 So I want to talk about the impact to
13 recreation. There are towns like Bend, Oregon that infuse
14 so much money into the community because they have a
15 beautiful place like Port Gamble could be. And if they do
16 this right and they do this as they intend to make this
17 just a beautiful community with this gorgeous open space,
18 we can see so much money added to our community. And I'm
19 really pleased by the whole plan.

20 The sun is out, and I'm going to go ride my bike
21 on that property right there.

22 MR. DAVE GREETHAM: Thanks, Brian.

23 We have one more commenter, then we'll certainly
24 open it up for other folks who think they'd like to maybe
25 come up with some other comments or questions. So the

1 last one on the list is Craig Jacobrown. Is Craig here?

2 MR. CRAIG JACOBROWN: So I can take more time.

3 MR. DAVE GREETHAM: We're doing fine on time.

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1 C R A I G J A C O B R O W N

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3 MR. CRAIG JACOBROWN: Well, I'm pleased to -- I
4 also mountain bike and worked at the theater in Port
5 Gamble last summer and was able to mountain bike from my
6 home in Indianola. I guess I'm supposed to say Indianola,
7 and you spell my name J-A-C-O-B-R-O-W-N, Craig with a "C."

8 And so I love what OPG has done for our county.
9 The trails really connect Indianola and all the other
10 cities in the county to Port Gamble. So the value that
11 OPG has brought to our county is not lost on me. I am
12 very thankful for it.

13 But in all seriousness and with all due respect,
14 I believe that we are all, everyone in the room is
15 interested in attracting people with quality hearts and
16 minds, whether they are tourists or they are moving here
17 to be residents or whether they are business owners to
18 come to utilize this beautiful Port Gamble area as well as
19 anyone else who is going to come to the county.

20 So with that in mind, I believe that we have the
21 opportunity now to do some really quality planning. And
22 so this EIS process, I think several people have already
23 mentioned, has the opportunity to look at a number of
24 things. I'm just going to repeat the nonpoint source
25 pollutions, even though Jon Rose has mentioned they're

1 already in the process and, I guess, committed to pulling
2 out all the toxic creosote-laden posts. And I'm glad to
3 hear you're committed to that. I sometimes hope that
4 that's in writing somewhere so that some of the things
5 that we hear that maybe that won't happen unless something
6 else happens first. That concerns me.

7 But the nonpoint source pollution, as others are
8 saying and as our friend Mark has said, it would be
9 nonpoint pollution that comes through his culvert.
10 There's certainly going to be more nonpoint source
11 pollution that's going to come through into the bay from
12 this town. I hope EIS is going to be looking at that.

13 But I wanted to bring up one other thing that I
14 have not heard mentioned, or at least in the detail that
15 I'd like to hear it mentioned. I believe in the first
16 phase or some very early phase of the EIS, it is important
17 to study the indigenous history of the first people
18 communities that have been -- that can be covered in the
19 shoreline area. And if it's verified that a town has been
20 there not only for the past couple hundred years but for
21 thousands of years, that the history of that should, I
22 believe, be highlighted somehow in this town. That, in
23 fact, would help to attract these tourists with the hearts
24 and minds we're looking for, but also the residents for
25 that town -- for the town. And that this -- you know,

1 maybe some of this area here could not only be a marine
2 science center, but some of it could be museums to
3 commemorate and pay homage to the first people who clearly
4 would have -- we know they've been there for a couple
5 hundred years or were there for a couple hundred years
6 before the mill. We believe there's some evidence and at
7 least a belief, and maybe there could be more evidence
8 uncovered that they've been there for thousands.

9 And I then believe -- and the Suquamish would be
10 -- also, I'm glad you're working with both tribes. The
11 Suquamish is going to be very interested in the thousands
12 of years ahead of where the Port Gamble S'Klallam, of
13 course, are going to be able to verify.

14 But other than that, the town of Port Gamble
15 right now already has a museum which does a really good
16 job of pointing out this history, especially vis-a-vis how
17 trees have been utilized by primarily non-natives but the
18 natives that would work in the mill site. And I believe
19 now you could extend that, and the invitation is there, to
20 have more museums, more cultural activities, more that
21 look at the tree and how -- cedars, firs, all the
22 different trees that have been used in that area for years
23 have been -- would have been used thousands of years
24 before, and to attract that kind of people to our area and
25 highlight that as part of our rich heritage is, I think, a

1 must. And I haven't heard it enough, and I hope that we
2 hear more about that from you all.

3 Thank you.

4 MR. DAVE GREETHAM: Thanks, Craig, and all for
5 your thoughtful comments.

6 So Craig is the last one on the sign-up list.
7 Does anyone else want to -- yeah, Jon, and anybody else
8 that wants to offer some comments, we've still got some
9 time.

10 MR. JON ROSE: So I just wanted to offer some
11 clarifying comments. Because you had questions, it's easy
12 to answer up here.

13 Regarding storm water and nonpoint pollution,
14 Driftwood Key is actually an old Pope & Talbot project
15 that was done in the late 1960's. And we're proud of all
16 the projects that our parent company was involved in
17 including Driftwood Key, but it was done at a time before
18 people understood what kind of impacts to storm water and
19 saltwater quality development had, development of all
20 kinds.

21 And so the Driftwood Key project has absolutely
22 no storm water nonsource point pollution control in it.
23 Most of our historic towns do not. Kingston does not,
24 Poulsbo does not, Bremerton does not. All of these places
25 got developed 100 years ago, and it's really only in the

1 last 25 years that storm water treatment has become part
2 and parcel of land-use development.

3 Port Gamble is no different. It has got roads.
4 It has huge expanses of asphalt. Down on the mill site
5 today, it has 50 buildings, it has an acre of greenhouse.
6 And today, none of that is treated for storm water
7 quality. None of it. But when this project is done, all
8 of it will be treated for storm water quality.

9 So the day after this project is done, there
10 will be more storm water treatment, which is part of this
11 EIS process, than there has ever been in Port Gamble
12 before that exists today in Poulsbo, that exists today in
13 Driftwood Keys. And that's one of the benefits of having
14 an old town go through a redevelopment is storm water
15 quality will be better after the project is done.

16 Regarding cultural resources, a couple things.
17 There will be a cultural resources section that is going
18 to cover both post-settlement era, so from the time Pope &
19 Talbot landed there and founded the town. There's going
20 to be an eye on that cultural resource of that era because
21 this is a national historic landmark district like
22 Williamsburg, like Mystic Seaport. This is a very special
23 place, and that's going to be studied extensively.

24 Concerning pre-contact cultural resources, we
25 have -- the county will have somebody on board who is an

1 archaeologist who has studied Port Gamble before, because
2 we did that study during the environmental cleanup. That
3 same archaeologist is going to study cultural resources.

4 Concerning museums, tribal museums, our mind has
5 always been open. We have, since I began working at Pope,
6 a standing offer that we've reiterated several times to
7 the Port Gamble S'Klallam tribe to come into our museum
8 and change it, help us change it to reflect the people
9 that live across the water and their history. That's been
10 done formally, it's been done informally. To date we
11 haven't been taken up on that. Maybe someday we will. As
12 long as we're still part of the town, which we won't be
13 forever, we'll be open to that. But we can't make
14 somebody take an offer. So those are things that are
15 sensitive to us, Craig.

16 Can I take any questions if people just had
17 questions that I could answer?

18 AUDIENCE MEMBER: I live down at the end of the
19 bay. And when you started the cleanup, how long was the
20 bay closed for shell fishing when you started the cleanup?

21 MR. JON ROSE: So the question is, this
22 gentleman lives at the south end of the bay. When the
23 cleanup starts, how long is shell fishing going to be
24 closed? And it will be -- I mean, it will be temporary.
25 That's going to be something that the Department of Health

1 and the Department of Ecology have to figure out what is
2 the length of time that seems reasonable. And those are
3 suggested. Nobody's going to arrest you for picking off
4 your own beach.

5 AUDIENCE MEMBER: No. But last time you started
6 doing cleanup down there, my beach was closed for almost a
7 year for shellfish. You were stirring up all (inaudible)
8 and all the creosote. Do you have any plans to cap that
9 bay at all or are you going to start dredging?

10 MR. JON ROSE: So the question is, what's going
11 to happen with the bay. The last time a dredging project
12 happened, they closed his beach for a year. And, again,
13 this is not about that, but I can help answer that
14 question.

15 So there have been two dredging projects that
16 happened: one in 2004 and one in 2007. Those were both
17 done by Pope & Talbot just before they went bankrupt. The
18 dredging that we are going to do going forward will be
19 larger in scale than both of those put together. And no
20 creosote pilings were removed during that. So I'm
21 guessing this is going to be more impactful in terms of a
22 shellfish closure.

23 How long will it last? I don't see why it would
24 last less because it's going to be bigger.

25 Is there going to be a cap put in place? All

1 around the mill -- so part of that environmental cleanup
2 is through most of the mill site. The tideland area
3 between high water and extreme low, that area for much of
4 the mill site is going to be dredged. So we're going to
5 go and dig an average of two feet out and then replace
6 that sand with sand from our sandpit. Out in the water
7 you can't do that, and it will be these buckets that
8 dredge and place the material on a barge.

9 AUDIENCE MEMBER: So all the oil and hydraulic
10 fluid that's been spilled in there for how long will all
11 be dredged up?

12 MR. JON ROSE: Well, hopefully not much
13 hydraulic fuel because that's lighter than water and
14 floats, but there was -- absolutely going to be stirred
15 up. And then through all of the areas where we dredge,
16 there's going to be a sand cap placed that's going to go
17 from one foot to a maximum of four feet.

18 AUDIENCE MEMBER: So you wouldn't have capped
19 that instead of dredging it like they did on Eagle Harbor
20 on Bainbridge Island?

21 MR. JON ROSE: So the question is, can't you
22 just cap it instead of dredging it.

23 AUDIENCE MEMBER: Or is there plans for a deep
24 water dock there, a deeper water dock than there is?

25 MR. JON ROSE: Are we not doing that because of

1 plans for a dock? So actually, our cleanup plan in 2011
2 was estimated to cost \$4.5 million dollars. And a bunch
3 of stakeholder groups around the bay said they're not
4 doing enough to clean it up. And so Ecology, in
5 responding to tribes and neighbors, about tripled the size
6 of the dredging project to address their concerns. That's
7 taken that project to now a \$17 million project to address
8 primarily tribal concerns.

9 And we wanted to -- and there's areas where the
10 wood waste is very deep that our consultants suggested we
11 just cap it, which is, you referenced, in Eagle Harbor,
12 why don't you just cap it and not stir up the muck. But
13 neither the tribe nor DOE wanted us to do that. They
14 wanted us to dredge everything out and then replace it.
15 And we wanted to do it because we thought it would be
16 effective and it would cost less, but it didn't go that
17 way.

18 MR. DAVE GREETHAM: And I should have
19 re-emphasized, of course, none of that will be part of
20 this EIS because it's completely independent.

21 AUDIENCE MEMBER: I just asked a question.

22 MR. JON ROSE: Sure.

23 MR. DAVE GREETHAM: Thanks again. Glad we can
24 share the information.

25 MR. JON ROSE: However you get the information,

1 it's important because there's a lot going on in Port
2 Gamble right now.

3 Craig.

4 MR. CRAIG JACOBROWN: So I appreciate you said
5 that you've welcomed some collaboration with the S'Klallam
6 tribe in a museum. And I'm interested in have you offered
7 some collaboration in this initial part of the EIS where
8 they might be able to help with some of the archaeological
9 digging to find out what else might be out there other
10 than --

11 MR. JON ROSE: So the way it works is we have
12 to. So even if we didn't want to, the process, we would
13 be required to collaborate with the tribes, and that will
14 be through the county's consultant who will ask the tribe
15 to share whatever they're willing to share on what they
16 know about any prehistory and settlements. So that's
17 going to be done with both the S'Klallam and the Suquamish
18 and other tribes including the Skokomish. There was
19 actually another band up in this area that was as big a
20 part of this area called the Chimacums. They were wiped
21 out through intertribal warfare after a European contact.

22 So that word goes out, that invitation goes out.
23 You can't make people participate, but that will be an
24 official part of the process.

25 MR. CRAIG JACOBROWN: Will it be early?

1 MR. JON ROSE: It will be early. That's part of
2 -- that's exactly what the scoping business is all about.

3 AUDIENCE MEMBER: So their comments are due by
4 the 20th, as well?

5 MR. DAVE GREETHAM: Yeah. Everybody's comments
6 are due by the 20th. But the way this process works, once
7 we issue a draft EIS -- and I know Rich mentioned this,
8 but I'll reiterate this. This is important. We'll gather
9 all this information, discuss the alternative and issue a
10 draft EIS. That will then open up another 30- or 45-day
11 comment period. So you'll be able to see the results --
12 preliminary results of everything we're discussing tonight
13 in that draft document. And everybody on this list and
14 anybody that comments will get notice of that draft EIS.
15 So we'll probably have another public meeting at that
16 time, too, to go over some of these points. But all these
17 items will be in that draft document, or at least after we
18 finish narrowing the scope.

19 I just wanted to make sure people are aware
20 there's that additional comment period. And then there
21 will be an additional comment period when Mr. Smith
22 eventually prepares a staff report to the county hearing
23 examiner on the overall proposal.

24 So with that, are there any other comments on
25 the scope of the EIS? Yeah, Ron.

1 MR. RON EBER: There's two questions. You've
2 talked about the EIS process. What's the basic timeline
3 for the completion of the EIS before you release the
4 draft?

5 And then the second question is more to the
6 overall proposal. This is obviously under the existing
7 zoning, not a series of individual permits for each of the
8 lots under the existing zoning. It's (inaudible) sort of
9 master plan. Can you say more about what that is or what
10 the standards are that they have to comply with, whether
11 those are just under the county plan or that's the State
12 statute?

13 MR. DAVE GREETHAM: Sure. So two questions.
14 One was the timing of the EIS. Don't quote me on this
15 date. They will be wrong. But we usually tell folks the
16 draft EIS is a good six to eight months in preparation.
17 The EIS process can easily take a full year. Rich
18 probably has plenty of experience, and you might want to
19 offer some feedback on dates, as well.

20 MR. RICH SCHIPANSKI: Basically, the schedule
21 can't be defined, obviously, until scoping is completed
22 and we know what elements and alternatives and all that.
23 But I think Dave is correct in that just a ballpark that
24 the draft would probably be -- I'm assuming it could be
25 issued in the summer -- late summer, maybe.

1 MR. DAVE GREETHAM: So maybe late summer for the
2 draft?

3 MR. RON SCHIPANSKI: And the final probably
4 around the end of the year, in that range.

5 MR. DAVE GREETHAM: So to reiterate, probably
6 late summer for the draft, and then we'll have a comment
7 period, and then a final answering and responding to those
8 comments toward the end of the year. Like I said, nobody
9 quote me on that date. They're always off by a little
10 bit.

11 And then Ron's second question had to do with
12 the actual permit applications. The zoning code is very,
13 very detailed with regard to the rural historic town and
14 what's allowed and what's required to be reviewed. And so
15 the application we're looking at is called the performance
16 base development. In plain English, that's a big
17 plat-type project, but it's got some flexible setbacks and
18 side yard setbacks and heights and things like that.
19 Because you're looking at the big picture, you get some
20 flexibility in how you review it.

21 We also have a shoreline permit for all the
22 activity -- shoreline substantial development permit,
23 excuse me -- for all the activity within the 200-foot zone
24 of the shoreline. That's where the state shoreline law
25 applies. We will eventually have grading permits and

1 building permits down the road, but all that follows the
2 hearing examiner process and the EIS process.

3 So right now this is being looked at under
4 what's called a performance base development. In plain
5 English, a big, almost a master-plan-type view of the
6 entire project, and then the building permits and grading
7 permits follow after it's been through the local process,
8 the land-use process.

9 Yes, Lou and then Dave.

10 MR. LOU FORITANO: It's kind of a spontaneous
11 thought, and I've not suggested this to Jon, but this is
12 as good a meeting facility as you can get. But since
13 we're talking about Port Gamble, it might be nice on down
14 the road when we have a lot more meat on these bones to
15 schedule at least one public meeting on-site. I want to
16 remind you that there is a gathering place, if Jon would
17 make it available, for a meeting at least of this size.
18 And for anyone who hasn't walked the ground there or wants
19 to see what some swell idea is or some swell plan, it may
20 be nice to see it in place up there.

21 MR. DAVE GREETHAM: So the suggestion is
22 possibly a future public meeting on the site or on the
23 grounds at Port Gamble.

24 Jon.

25 MR. JON ROSE: If Dave were to facilitate that,

1 we wouldn't charge him less than double.

2 MR. DAVE GREETHAM: We've been offered slightly
3 less than double the rate if we have that meeting.

4 Dave, and then we had another question.

5 MR. DAVE HALEY: I did come up with a question.

6 MR. DAVE GREETHAM: Dave, do you want to come up
7 and provide some input into the record for the scope?

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1 D A V E H A L E Y

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3 MR. DAVE HALEY: Okay. Dave Haley, Indianola.
4 I, too, am from Indianola. David Haley, H-A-L-E-Y.

5 It's really a question about the other
6 activities that go on in the bay. I don't know how
7 expansive the EIS is, but there are other activities.
8 There's a dock across the bay on Point Julia and there's a
9 number of residences around the bay. Does the EIS, for
10 this project, consider other impacts of activities that
11 are going on presently on the bay?

12 MR. DAVE GREETHAM: Yes. So the question, of
13 course, is what other impacts need to be discussed outside
14 this project on the bay. And the SEPA, State
15 Environmental Policy Act, requires that we consider
16 cumulative impacts. We can't look at this, you know, in a
17 narrow box. We've got to discuss other things that we're
18 aware of in the bay. That's called a cumulative impacts
19 discussion. And that's where we acknowledged some of the
20 other activities that we're aware of that are being
21 proposed or known future activities in and around the bay.

22 So when you see that draft, you'll see a
23 cumulative impact discussion for other activities. And
24 although the EIS won't necessarily be driving the permits
25 for those other activities, it has to acknowledge those

1 and consider them along with this project.

2 MR. DAVE HALEY: Thank you for that.

3 I do have one concern. The gentleman mentioned
4 that there have been a lot of studies along the shore of
5 Port Gamble. The dock that's been proposed in this
6 development is more north of the point, the mill site
7 point. And it seems to be that that would be a tremendous
8 benefit to the bay in having it basically outside the bay
9 proper rather than inside the bay proper. And I would
10 hope that there would be studies of currents and sediment
11 drift that would be included in the EIS to determine
12 whether or not that will cause any impact at all on the
13 bay.

14 MR. DAVE GREETHAM: Thanks, Dave, for the
15 feedback.

16 Yes. Come on up.

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1 C H R I S T I N E C A S T I G L I A N O

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3 MS. CHRISTINE CASTIGLIANO: Hi. My name is
4 Christine Castigliano. Would you like me to spell that?
5 C-A-S-T-I-G-L-I-A-N-O.

6 I'm a property owner. My property adjoins the
7 open space part. What's the correct name of that, the
8 4,000 acres that we all ride on? What's it called?

9 MR. JON ROSE: Popeland.

10 MS. CHRISTINE CASTIGLIANO: Popeland. Okay. So
11 my property adjoins Popeland. And I just want to say that
12 I'm really, really pleased in general with some of the
13 inclusions here. I love the cluster development, I love
14 infill, I love the agrarian aspect of the farm, and I
15 really like what I've heard about the wastewater
16 management.

17 So I think the primary concern I have about that
18 is about traffic. And so I'm wondering if it's possible
19 to find out more about that future bypass. Because I
20 believe that that will have a significant environmental
21 impact as well as potentially property owners like me. So
22 I'm not sure. I know that it might be beyond the scope of
23 your immediate plan, but to me it's related. So I'd like
24 to ask about more info.

25 MR. DAVE GREETHAM: And on a general note, I

1 just got preliminary comments from Washington State
2 Department of Transportation before I left my office
3 today. So they'll be looking at that very closely, as
4 well.

5 I don't know all the specifics yet since we
6 don't have the detailed traffic analysis. I'm not sure
7 there's anything we want to add tonight about that, but
8 the draft EIS will go quite in-depth on traffic. And we,
9 like I said, already got comments from DOT.

10 Jon.

11 MR. JON ROSE: Can I just do it from here?

12 MR. DAVE GREETHAM: Yeah. Shout it out, Jon.

13 MR. JON ROSE: So the idea of the bypass really
14 came from a study that the State did around 1997. So they
15 got some funding to do an EIS. The funding ran out before
16 they completed the EIS. They had a preferred plan which
17 basically called for taking 104 up over the top and almost
18 down all the entire ridge of our upland block. They
19 called it the Fillet Plan because it filleted the land
20 into two pieces. And our traffic that we're generating
21 here is only a fraction of the 70,000 people that live in
22 Clallam -- or Clallam and Jefferson counties. So this 200
23 homes is not going to own the bridge, but somebody needs
24 to be thinking about what happens here in 20 years.

25 We have just allocated space for a bypass up

1 next to town. It's shown there. But the idea is we're
2 not building it. It's going to be part of our traffic
3 mitigation to leave that behind so this region has a way
4 of dealing with that issue as we go forward. That bypass
5 is right here. If I wasn't so nervous of all you people,
6 my hand wouldn't be shaking. So it's right in there.

7 And when will it get built? They didn't even
8 have enough money to finish their study, but at least
9 there will be space there without having to condemn
10 properties.

11 AUDIENCE MEMBER: What happens to the people at
12 the end of the bay?

13 MR. JON ROSE: You will see a slightly worse
14 condition than you have today.

15 AUDIENCE MEMBER: Slightly?

16 MR. JON ROSE: Slightly worse.

17 AUDIENCE MEMBER: It's pretty bad.

18 MR. JON ROSE: It is bad. Why did you buy on a
19 highway, for God's sake?

20 AUDIENCE MEMBER: 25 years ago it wasn't that
21 bad.

22 MR. DAVE GREETHAM: And like I said, that will
23 be a big element to the EIS review, too. So stay tuned
24 for the draft on that one. I think the short answer, what
25 Jon told us, is the bypass is shown as a set-aside area

1 that OPG is not planning on constructing that as part of
2 this project, but it's being set aside for potential
3 future.

4 Any other questions? comments? Yes.

5 AUDIENCE MEMBER: Is anyone looking at
6 developing the wetlands?

7 MR. DAVE GREETHAM: The question was, is anybody
8 looking at wetlands. And the wetlands are -- you'll see
9 on the colored plans more clearly than this one even. As
10 you go further south of the historic town site, there's a
11 very large wetland system or two or three. And we do have
12 a very detailed wetland study already in the application
13 materials. So that's going to be a big part of the
14 review, as well. We've identified water resources. That
15 includes the bay, wetlands, storm water. But yes.
16 Wetlands are a significant part of that landscape on the
17 south end of town.

18 Other questions? Yes.

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1 J O H N W I L L O T T

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3 MR. JOHN WILLOTT: Pegleg, P-E-G-L-E-G.

4 I am John Willott, and I am the past president
5 of North Kitsap Trails and cofounder of the Kitsap Forest
6 and Bay Coalition.

7 In 2007 Pope came to the community and asked
8 what they wanted to do with this land. And it was a very
9 courageous thing to do, to ask us. Through that time,
10 through these past six years or so there's been very -- a
11 lot of involvement in these projects. RWIP, Legacy
12 Project, we've got the Forest and Bay Project now out of
13 this all because all you worked together, because you all
14 really care about this. The county has put in just tons
15 of hours, tons of time, money. OPG, Pope has put in lots
16 of money and time to do this right. It is really, really
17 encouraging to me to see all the caring about this project
18 by the community.

19 I have been in other communities and worked
20 them. Methow Valley is one. And the caring came out in
21 there, and they've created a wonderful place for people to
22 live, and everybody is very happy living there. I see
23 that same caring happening here. And out of that caring,
24 I think we're going to really have a great project in the
25 end. And I want to applaud all of you for that, and being

1 involved, staying involved and talking, and keep talking
2 and keep evolving as we go along this process.

3 Here's to you all. Thank you, very much.

4 MR. DAVE GREETHAM: Thanks, John.

5 Any other comments?

6 John kind of stole my thunder. The county can't
7 say thank you enough for the time you're putting in. And
8 it is really going to be helpful as we hone in on this,
9 these EIS topics.

10 So we'll stick around for a little while. We've
11 got boards. We can answer some more questions. And
12 thanks again for coming, folks. Stay tuned for that draft
13 EIS.

14 [Meeting concluded at 6:30 p.m.]

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C E R T I F I C A T E

STATE OF WASHINGTON)
) SS
COUNTY OF PIERCE)

I, Cheryl A. Smith, a Court Reporter in and for the State of Washington, do hereby certify:

That the foregoing EIS scoping meeting was taken before me at the time and place therein set forth;

That the speakers were by me recorded by voice recognition and thereafter transcribed under my direction;

That the foregoing transcript is a true record of the EIS hearing given by the speakers, to the best of my ability.

I further certify that I am in no way related to any party to this matter, nor do I have any interest in the matter

Witness my hand and seal this 27th day of March, 2013.

Cheryl A. Smith, CCR No. 3317
in and for the State of Washington,
residing at Auburn. My certification
expires August 5, 2013.

Appendix D

Compilation of Written Scoping Comments

Name	Representing	Email Address	Comment	Date
Bert Jackson	Individual	berthj@centurytel.com	<p>E I S WIDER PLAN & WATER</p> <p>The development of Historic Port Gamble calls for a special plan. We ask you to consider the impact of Port Gamble on the wider community. This is an opportunity to initiate 21st Century solutions and the potential for a new way of living in community.</p> <p>To do no harm means, no commercial, no industrial, no residential construction In the flood plane.</p> <p>The Port Gamble Historic Village has an existing water problem. The current development plan will meet only the current needs, When the development is built out, the impact will require Port Gamble to get additional water from Poulsbo.</p> <p>What if a desalinization utility was placed in the flood plane? The water plant would not only serve Port Gamble, but also the wider community as their wells fail. Maybe send water to Poulsbo who is also concerned about their water future. Another bonus is to construct the desalinization utility property to be park like and open space for the public.</p>	

Name	Representing	Email Address	Comment	Date
			<p>Environmental Impact Study Re; "The Port Gamble Experience"</p> <p>You are charged with the task to review the Port Gamble development plan to do no harm and have zero waste. Please make sure this plan does not impede the existing Port Gamble Experience.</p> <p>The Port Gamble Experience is to touch, feel and know Port Gamble. To know Port Gamble, means hiking, kayaking, and experiencing the unique natural Northwest beauty up close.</p> <p>This is an opportunity to have a plan that showcases the Port Gamble Experience and builds a thriving community. The Port Gamble Experience calls for more open space and a defined business district. A business district that serves the community and honors the history and culture of Port Gamble.</p> <p>We can do no harm and do good by not building in the flood plane and making it open space. We can design a business district that nourish each other, share space, parking and utilities to lessen the impact on this special village and the Port Gamble Experience.</p>	

Name	Representing	Email Address	Comment	Date
			<p>The EIS Task</p> <p>The Port Gamble Redevelopment Plan has an impact on the ecological environment and just as important, impacts the cultural environment.</p> <p>PGRP is like a pony that has only one leg. A plan highlighting tourism. The three missing legs are, ecology, community and culture.</p> <p>1. Ecology: To build in the flood plane creates a huge potential for pollution.. Water will be inadequate when the plan is built out or completed. The sewer system, LOSS, also is limited and minimal. Storm water and rain gardens empty directly into Hood canal.</p> <p>2. Community; There is no defined business district. . Traffic patterns and parking are inefficient The plan discourages the “walk about’ image of Port Gamble.</p> <p>3. Culture: No mention of recognizing the lumber / forest culture.. No plan to recognize the marine / fishing culture. No encouragement in the plan to have Native American culture (Port Gamble Historic Village status was given to recognize and encourage its culture and history.)</p> <p>To address how the ecology, community and culture are impacted by this plan, will change Port Gamble tourism from a seasonal to a year round business. It will also seriously improve the land value.</p>	

Name	Representing	Email Address	Comment	Date
			<p>Environmental Impact Study Hotel Placement</p> <p>Port Gamble Redevelopment Plan proposed hotel placement is wrong on 3 counts.</p> <ol style="list-style-type: none"> 1. Built in the flood plane brings high environmental risk. Protecting existing habitat is the most important action needed.. Do no harm. 2. Poor economic investment. The hotel caters to boating making it seasonal. The hotel has a limited view. 3. Separated from the rest of the town. <p>PGRP for the hotel on the highest hill is right on 5 counts</p> <ol style="list-style-type: none"> 1. Has three views instead of one. 2. Four million people drive through Port Gamble every year, according to the real estate industry, on their way to the rain forest and mountains.This would give higher visibility and access to the hotel. (Less room vacancy.) 3. Able to control ecological events from the hotel and parking lot. 4. More integrated with the business district 5. More historically correct. 	

Name	Representing	Email Address	Comment	Date
Paul Lee	Individual	plex2g@gmail.com	<p>Dear County Commissioners, I understand that you will be reviewing the proposed development plan for Port Gamble. I would like to express my view and concerns as a property owner on Gamble Bay. The pollution of soil and water near and around Port Gamble by Pope and Talbot notwithstanding, Gamble Bay remains one of the very few body of water that is not overdeveloped in the State of Washington coast. It is actually a very pristine bay, with abundance of shell fish, like oysters and clams and geoducks. It is also breeding ground for various species of fish, like the second largest herring spawning ground in Washington. Salmon and steel-head return to the bay annually. I am concerned that the proposed development may have significant adverse impact on the Bay, like runoff from the development into the bay. The increase traffic is also an significant issue. HWY 104 is 2 lane passageway and the only route in and out of Port Gamble. But the more important issue is the proposed dock/ marina that OPG wanted for over night moorage and docking of large commercial tour boats and seaplanes. There is the fear of personal waste discharged into the bay if overnight moorage is allowed, creating coliform bacteria and subsequent closure of the bay for shell fish harvesting. Large commercial tour boat propeller wash may re-suspend toxic materials, impacting the shellfish and geoduck beds in the Bay. According to county code, Title 22, areas identified by the WDFW, or Department of Natural Resources, as "having a high environmental value for shellfish, fish life, or wild life, piers and docks shall not be allowed except where functionally necessary to the propagation, harvesting, testing or experimentation of said marine fisheries or wildlife, unless it can be established conclusively, as determined by the shoreline administrator, that the dock or pier will not be detrimental to the natural habitat or species of concern. I would therefore urge you to make sure the proposed development at Port Gamble to be limited in scale, and that a dock if approved should not have overnight moorage nor allowed to have large commercial tour boat or seaplane docking. Thank you for your consideration.</p> <p>Sincerely, Paul P Lee MD Kingston, WA.</p>	3/18/2013

Name	Representing	Email Address	Comment	Date
Susie Smith	Individual	bigdog5678@hotmail.com	<p>I was born and raised in New Hampshire, 5 miles from the Maine border. I have lived in New England off and on as an adult. Historic Port Gamble was built by and for millworkers from Maine. It is authentic, except the houses painted in colors are considered not authentic, not classy by New Englanders. White with black shutters, or pale yellow, or natural, weathered wood are genuine to a New England seaport town. Each house should have a placard by its front door telling when it was built and who the original occupant was. The old shops and the church also should have placards. New England has found over and over, that the fastest way to destroy the tourist trade for a small seaport town is to build more structures, or to add a large hotel/restaurant. The tourists stop coming because it has been made into tourist glitz, and they seek out unspoiled, undiscovered little seaport towns instead. Port Gamble is an historic gem for Washington, and OPG wants to destroy its historical aspect just to make money. I've seen this happen over and over in New England, and New Englanders are always sorry that their community leaders allowed the historic quality to be destroyed in the name of quick profits. The developer collects his profits, and withdraws, leaving the town no longer able to sustain itself on tourism dollars, and the town becomes just another town like any other, where the residents commute long distances to a job, because they no longer can earn a living in the home town. OPG says they will build the new structures in the New England style. Obviously, they don't have a clue about the New England style, or they wouldn't have the buildings painted in colors, and they wouldn't be forbidding sheds in the back yards. Anyone can tell when a structure is a modern reproduction and when it is truly old. Reproductions do not attract tourists. They are a red flag that the place has been turned into a tourist trap, and the tourists actually stop coming, because they want "the real deal". Please don't let an historic gem be destroyed by a bankrupt company. Once ruined, the historic charm cannot be reclaimed. OPG will leave Washington, either through bankruptcy, or because there are no more forests to rape. So losing our heritage in an effort to cater to a big corporation is useless in the long run. OPG simply wants to build more houses to sell/rent, and they can do that in any other modern town in the Northwest that is growing and needs more housing. The housing market is picking up now. We just built, and our builder was overwhelmed by the number of people on his waiting list.</p> <p>Jennifer Moon Kingston</p>	3/18/2013

Name	Representing	Email Address	Comment	Date
Dave Haley	Individual	davehaley@comcast.net	<p>To: Kitsap County DCD; I am writing to address the subject of the future of piers proposed by Pope/OPG at Port Gamble relative to the environmental health of the bay. I request that the EIS thoroughly address the two existing piers (docks) south of the mill site and construction of a new dock or docks. OPG's Preferred and Alternate Plans are clearly of significant environmental benefit to the health of Gamble Bay for several reasons. The two existing old creosote piers would be removed (currently in negotiations between OPG and WDOE) and replaced with a new environmentally compatible dock. Not only will the toxic creosote be removed, but the new dock will be outside Gamble Bay proper since it would be located north of the mill site point. Due to the location and flushing by prevailing tidal currents it would therefore have significantly less impact on the bay than any pier or dock located within the bay. A thorough review of surface tidal currents and sediment drift should be done for the new pier location. Chances are that there is no impact on the bay, not unlike the dock south of Pt. Julia on the east side of the bay which is within the bay proper. There are two small piers located south of the mill site point are indicated to remain in the plans. The EIS needs to address these as well. The improvements to the health of the bay that should result from OPG's Plans would be a real plus for Gamble Bay, Hood Canal and Puget Sound.</p> <p>Dave Haley Indianola</p>	3/19/2013

Name	Representing	Email Address	Comment	Date
Linda Troup	Individual	ltroup4435@aol.com	<p>Kitsap County Planners and Developers: I am a long time Kitsap County resident and 35 year military veteran who retired with honorable service. This is in response to the Herald's request for citizen opinion on the health of our environment. While city growth reflects positive change and economic improvement it often overlooks and neglects an important aspect. Over the years my family, friends and I, all animal advocates, have seen much development that encroached or removed wildlife habitat in Kitsap County. Nothing is apparently done to mitigate the sudden disruption of wildlife homes. Dens are bulldozed over and protective brush and trees removed. One often sees dead wildlife who became confused, frightened and fled onto roads and are killed. In 2011 we witnessed a family of raccoons, babies too, lifeless on highway 305 when the Bremerton Winco supermarket mall was created. More recently in Poulsbo nine acres of dense woodland was plowed away to prepare for a new Safeway, with no regard for the squirrels, raccoons and opossums living there. Such disregard is immoral, not ethical and just plain wrong. When "might is right" becomes the most prevalent attitude, people are harmed, too, by a brutish desensitization that diminishes one's humanity, by not taking into consideration that this world is for wildlife, too. Its easy to look the other way' but this world also belongs to animals. A world that nurtures and sustains wildlife, not just humans. Such disregard is how animals become endangered, when only human interests count. While environmental impact statements do assess critical areas and whether endangered animals exist in a proposed development, it does not consider many other animals who are not (yet) endangered. They are on their own... An easy solution to this neglect is for city planners and legislatures to require that developers provide for the wildlife who will be displaced or have their lives disrupted by a proposed project. Developers can hire trappers to humanely trap and relocate wildlife to safe, forested areas. It would not be cost prohibitive. One of many licensed trappers would have charged approximately \$450.00 for a week of humane trapping, checking traps daily, for the nine acres referred above. Trappers can collaborate with the Washington Department of Fish and Wildlife to ensure good transfer placement. Many animal welfare organizations in Kitsap County have volunteers who love and respect wildlife, who would sign waivers and eagerly assist in the humane trapping/transfer process to save affected wildlife. All this can start early enough to prevent slowing development timelines. Many heartless developers will disagree, even mock this concept and want business as usual. But these ideas are a just a beginning for a better world, or county, that cares for its wild residents, too. Anyone can help improve the direction this leads with his or her own recommendations. We need to expand our consciousness and extend empathy toward wildlife in order to be good stewards of Kitsap County. We don't have to wait for humane action to be legally required. Be proactive and show the rest of Washington how its done, how Kitsap cares. To ignore the welfare of wildlife is to demonstrate the worst kind of human behavior and can even be viewed as mean spirited, inhumane. City planners, developers, please demonstrate compassion and kindness to animals. Don't dismiss animal welfare, or pretend to agree and kick this proposal down the road. Animals matter and many, many Kitsap residents agree. Thank you.</p> <p>Sincerely, Linda Emily</p>	3/19/2013

Name	Representing	Email Address	Comment	Date
Lucretia Winkler	Individual	lucretiawinkler@yahoo.com	<p>March 19, 2013</p> <p>The following are items of concern regarding Port Gamble Redevelopment:</p> <ol style="list-style-type: none"> <li data-bbox="680 228 1808 386"> <p>1. Wetlands</p> <p>The development appears to be high intensity and adjoining multiple wetlands. The housing development, camping/RV/equestrian events area and farm/vineyard are in close proximity to the wetlands. Are there plans to address the issue of animal, fertilizer, and vehicular waste pollution to the wetlands?</p> <li data-bbox="680 423 1808 776"> <p>2. Groundwater</p> <p>My understanding is Kitsap County's drinking water comes from an aquifer (groundwater) system. The area receives no significant snowfall therefore the system must be recharged by rainwater. The county has been experiencing significant growth in recent years which stresses this system. Port Gamble redevelopment would add to the stress, and I am concerned about the following issues:</p> <p>Are the wetlands recharging areas? Wetland pollution mentioned in item #1 would eventually pollute the groundwater system.</p> <p>Is groundwater being recharged sufficiently to prevent saltwater intrusion from Hood Canal? This event would impact drinking water and vegetation</p> <li data-bbox="680 813 1808 906"> <p>3. Septic system</p> <p>I am assuming this system is designed similar to home systems but on a larger scale. How large is the drain field and what is the plan if the system fails?</p> <li data-bbox="680 943 1808 1068"> <p>4. Traffic</p> <p>State Route 104 has significant traffic on a normal day, and Port Gamble events already add to the congestion. A high-intensity development will only increase the confusion. How much of the wetlands will be destroyed to accommodate a by-pass? Isn't there a fee associated with this action?</p> <p>In conclusion, Port Gamble accommodated a larger population in the past but a large population may not be the best future. The county as a whole was less populated and resources less stressed. The mill site clean-up is also an indication environmental policies were not in place or considered. The grandiose past is not always the best option.</p> <p>Sincerely, Lucretia Winkler</p>	3/19/2013

Name	Representing	Email Address	Comment	Date
Ron Hirschi	Individual	whalemail@waypoint.com	<p data-bbox="625 133 737 164">Planners,</p> <p data-bbox="625 203 1808 391">Thank you for the opportunity to comment on the Port Gamble master plan. I grew up in Port Gamble, my Father and Grandmother were born there and all together, our family worked for the mill company for a combined total of about 300 years. One of my uncles was killed in the mill and our earlier elders worked with Pope and Talbot in Maine, first arriving here in the 1850s with Captain Keller. And so, you can imagine how connected we have been in the past. Our family is equally concerned about the future, especially the environmental condition of Port Gamble Bay and its tributaries.</p> <p data-bbox="625 430 1818 586">As a former Port Gamble S'Klallam fisheries biologist, I helped place Laudine DeCouteau Creek on maps. Prior to that time, its watershed had been clearcut and sprayed to kill riparian habitat simply because it was not placed on any existing maps. This small but valuable tributary to Port Gamble Bay has since garnered some attention and will eventually heal on its own, but I hope your review considers possible restorations and by all means, future protection.</p> <p data-bbox="625 625 1818 878">As a child, I played in the headwaters of Machias Creek, tromping up and down wooden flumes that still carried water to the town supply. We could, at that time, run back home and turn on the faucet to see muddy water caused by our young and ignorant mischief. Machias Creek is a historic salmon stream and I hope your review considers possible restoration as water supply issues surface, given the plans for additional homes. I think I had 40 customers when I delivered the Bremerton Sun to town residents in the 1960s. Not sure, but I guess, as is happening in other towns like Poulsbo, more water is going to be needed to supply all those additional people with drinking water. Perhaps if wells are planned, other water sources from springs that fed Machias Creek can once again be a part of its headwaters.</p> <p data-bbox="625 917 1818 1105">My understanding is that Machias Creek is a major piece of the history of why the original inhabitants of Port Gamble Mill Town site were asked to move across the channel. The mill needed its water supply. I remember what my father told me was the very first reservoir and we visited it once. It would be a westbank tributary to Machias Creek maybe only half a mile upstream from the bay on the east side of the old road to the Babcock farm. I remember it as a wooden structure similar to a small reservoir where I fished as a child, one used by the Alder Mill as their water supply in the South Fork of Laudine Decouteau Creek.</p> <p data-bbox="625 1144 1818 1490">I'm certain that others have addressed most of my concerns for protection of Port Gamble Bay, but I think there may be issues I know about because of my long time experiences with the shoreline. For example, the species diversity under and, ironically, on dock pilings at the mill site, is incredibly high. There are (or were) unusual populations of marine invertebrates on rocks and the pilings as well as in substrate that will be altered on removal of the pilings. As did others, we harvested scallops and butter clams under the dock. I also harvested invertebrates for my cousin, Tom Rice, for display purposes at the Of Sea and Shore Museum. I'm not suggesting that removal of the pilings should not take place, but your efforts might include possible salvage of unique species, including chitons and any scallops still present. Given the long term presence of human alteration of the site, habitat has been created that supports some amazing life, some of which has cultural value. Pockets of unusual species assemblages might be moved to other locations where tribal efforts are underway to protect and even restore similar habitat, such as kelp forests.</p>	3/19/2013

Name	Representing	Email Address	Comment	Date
			<p>My father is now 91 and lives on social security and help from family and friends since his retirement income from 40 years of employment with the mill disappeared when Pope and Talbot went bankrupt. I understand that it is not legally possible for holding Pope Resources responsible for that loss and yet, I see them spending a lot of money to clean up the bay, even though they were not the original corporation that caused what we now see as an environmental problem. Since you cast your net in a wide way to include cultural issues and historic impacts, I wanted to add a thought. Maybe it might be the ethical thing to do as Port Gamble moves into the future, to honor past debts, human as well as environmental.</p> <p>My father represents a promise once made, a historic promise to pay for his work that helped build the town. As Master Mechanic, he and Gene Deford were largely responsible for keeping the mill running, 24/7. He would work long days, only to be called at midnight to come repair some broken equipment when there was a night shift. His life was completely devoted to that mill. According to the Pope Resources website, "Pope Resources, Olympic Resource Management (ORM), and Olympic Property Group (OPG) benefit from a 150-year heritage of land and resource stewardship in the Pacific Northwest, stemming from our past linkage to Pope & Talbot, Inc."</p> <p>That historic linkage would not have been possible without men like my father. And, I can't imagine a healthy future for Port Gamble without there being some form of healing caused by past injustices; some gesture to honor people like my dad who should be receiving what he earned and what he is owed.</p> <p>Thank you again for the opportunity to respond.</p> <p>Ron Hirschi PO Box 22 Poulsbo, Washington 98370 whalemail@waypoint.com</p>	

Name	Representing	Email Address	Comment	Date
Mary Gleysteen	Individual	marygleysteen@gmail.com	<p data-bbox="632 139 804 167">March 19, 2013</p> <p data-bbox="632 204 1161 358">Kitsap County Dept. of Community Development Attn: Port Gamble EIS Scoping Planning and Environmental Programs division 614 Division St. MS-36 Port Orchard, WA 98366</p> <p data-bbox="632 396 1787 453">I attended the March 18, 2013 Scoping Meeting and want to support the "no action" alternative which was not discussed.</p> <p data-bbox="632 490 1797 651">I believe that Hood Canal is in crisis. Water quality, oxygen levels and the ability of the ecosystem to sustain itself are in jeopardy. Port Gamble Bay is a prime example. Although the Dept. of Ecology, OPG and other concerned entities are taking steps to remediate some of the factors which have lead to the degradation of this important resource, there is no indication of when the process will be complete or if the efforts will be sufficient to restore this part of the Hood Canal to a healthy state.</p> <p data-bbox="632 688 1787 849">I understand that the clean up is not a part of the SEPA process; and the project proponents cannot argue that their development will actually enhance the water quality by correcting effects of the run off, septic issues and other pollutants which currently contribute to the contamination of the canal. These issues, although caused by the proponent and its parent company and historically lax county regulations and enforcement, are separate.</p> <p data-bbox="632 886 1782 976">Remediation of current inadequacies should take place whether or not further development is allowed. Current deficiencies should be addressed prior to complication by additional risk factors such as increased paving, run off, vehicular, business, marine and household traffic and contaminants.</p> <p data-bbox="632 1013 1812 1102">The cumulative effects of construction, development and occupation of the proposed Port Gamble plan must be factored in with the effects of the dredging, pile removal and clean up currently underway and mandated by the state.</p> <p data-bbox="632 1110 1822 1200">The eelgrass, herring, shellfish and other ecological components of the marine environment are critical not only to the health of the bay and salmon recovery efforts, but also to the historic and cultural resources of the area.</p> <p data-bbox="632 1208 1818 1330">Salmon are historically prime cultural as well as economic resources as recognized by the Boldt decision and other treaty law. It is up to us as citizens of this county and country to uphold treaty rights and obligations, since Article VI of the US Constitution makes clear that treaties are the supreme law of the land. As such, they should be given great deference in decisions of this kind.</p> <p data-bbox="632 1367 1822 1456">Traffic and the provision of public services to 400 additional residences, recreation and entertainment venues will create noise pollution in areas that have not been previously been subjected to such development, (eg "the meadow" and the Babcock farm.)</p> <p data-bbox="632 1464 1778 1490">Traffic through Port Gamble is currently a nightmare. Cumulative impacts will be worsened with increased</p>	3/20/2013

Name	Representing	Email Address	Comment	Date
			<p>bridge closures due to construction at Bangor, on -going local clean up and remediation efforts, new construction, as well as those brought about by use by visitors, residents, maintenance, deliveries, school buses, fire and emergency vehicles, etc. I suggest that, along with the no action alternative, it would seem reasonable to require the proponent to mitigate the compounding of an already serious situation, one recognized as far back as 2007 when the state contemplated a by -pass.</p> <p>I therefore ask county staff and decision makers to consider the tenuous and worsening water quality situation in Port Gamble and Hood Canal, in addition to the cumulative impacts of the proposed development. This is not simply a regulatory issue or a paperwork exercise; it is the future of a unique and vital part of this place we call home.</p> <p>I urge you to adopt the “no action” alternative. If we are to err, let us err on the side of caution and preservation. It is time for us all to look beyond immediate financial gain, and to protect what is truly valuable and irreplaceable in our community.</p> <p>Mary Gleysteen 26707 Lindvog Rd NE Kingston, WA 98346</p>	
Jackie Rossworn	Individual	rosswornjr@wavecable.com	<p>As a waterfront owner and 35 year resident of Kitsap County I believe the best route for the development of Port Gamble should be the MAXIMUM DEVELOPMENT POSSIBLE. They should have docks, launches and everything water related to develop a "state of art" tourist center and city. As it stands there is not a viable tourist area in Kitsap County except a day trip to Poulsbo. Kitsap can do better than that! Sometimes the government is WRONG and is the PROBLEM. Over regulation is economically harmful and a deterrent to the possibility of a fantastic Kitsap County where people are excited to spend their vacations. Or we could take the route of SMP and GMA and remain wallowing in can't do this, can't do that, can't, can't, can't....can't grow BETTER, can't have NEW ideas, we can only regulate. Jon Rose and Company have spent millions and millions of dollars making a better place in Kitsap County than ever before. LET HIM CONTINUE.</p> <p>Jackie Rossworn Kitsap Citizen and home owner</p>	3/20/2013

Name	Representing	Email Address	Comment	Date
Irwin Krigsman	Individual	krigsman83@msn.com	<p data-bbox="634 139 877 164">David Greetham, DCD</p> <p data-bbox="634 203 806 261">Port Gamble EIS March 18, 2013</p> <p data-bbox="634 300 1167 324">Subject: Port Gamble Redevelopment Comments</p> <p data-bbox="634 363 1077 388">Department of Community Development</p> <p data-bbox="634 427 1734 485">Unable to attend the meeting concerning the redevelopment of Port Gamble, however, I would like to comment on this matter.</p> <p data-bbox="634 524 1772 583">Here is the issue—is the natural shoreline designation compatible with desired development plans for the shoreline component of this plan?</p> <p data-bbox="634 621 1814 712">If the natural shoreline designation is intended to preserve, maintain or restore those natural resource systems existing relatively free of human activities, and those shoreline areas possessing these characteristics intolerant of human use or of cultural and historic use, how can such a proposal be compatible?</p> <p data-bbox="634 751 1797 842">Activities which will degrade the natural or cultural aspects of the area should be discouraged, restricted or totally prohibited while, on the other hand, those activities which will contribute to the preservation of such areas and the enjoyment of such areas by the public are to be encouraged.</p> <p data-bbox="634 849 1791 940">This plan at this point may be good for tourism and business, but it appears not to be a sound legal plan for what will promote a healthy and productive shoreline environment, and a general respect and appreciation for what is trying to be accomplished by the tribe in cleaning up the bay.</p> <p data-bbox="634 979 1707 1003">Please include the following issues in the EIS. Narrowing these issues down would be of great value.</p> <ol data-bbox="680 1075 1814 1393" style="list-style-type: none"> <li data-bbox="680 1075 1814 1133">1. Natural features which are not suitable for substantial development, such as clearing construction or other operations that would change the natural character of the area. <li data-bbox="680 1172 1755 1230">2. Natural features which are culturally unique, protected or of community interest.(Historic town status) <li data-bbox="680 1269 1764 1328">3. Biologic systems which are intolerant of intensive use and critical to the continuing function and maintenance of larger ecological systems. <li data-bbox="680 1367 1545 1393">4. Those areas which need to be restored because of any of the above criteria. <p data-bbox="634 1432 1822 1490">Perhaps the other point needed to be included in this impact statement would be replication of services to be provided. How many hotel rooms do we need in any given area? Would this be in direct conflict with services</p>	3/20/2013

Name	Representing	Email Address	Comment	Date
			<p>provided by the tribal ventures?</p> <p>Lastly and a single most important issue is the treaty status of affected areas. This component could land Kitsap County mired in legal issues and great cost to the citizens of this county.</p> <p>Thank you for including this in your comment period.</p> <p>Judith Krigsman, Illahee</p>	
Marcus Hoffman	Individual	mhoffman@reidrealestate.com	<p>Kitsap County, Please keep the docks in place in Port Gamble. Losing the docks would be a serious set back in making this area one people can use and allow access to our waterways. The environmental clean up can be accomplished effectively and still allow Kitsap to enjoy our wonderful shoreline and waterways. Please don't tear out our unique cultural heritage and historic access. Marcus</p>	3/20/2013
John Willett	Individual (KFBC?)	johnwillett@embarqmail.com	<p>Kitsap County Dept of community Development Attn: Port Gamble EIS Scoping</p> <p>With the hand outs that I received at the County's Scoping meeting on the 18th it is hard to distinguish the details of what is really being proposed for the redevelopment of Port Gamble by OPG. That being said, this is an EIS scoping process and the particulars will be vetted and will evolve during this whole permitting process.</p> <p>Here are my concerns and comments from what I have gleaned so far from my inquiries and experience:</p> <p>1) OPG's development Plan should include 21st Century techniques in tertiary treatment of storm water and sewage. Whether using bio or mechanical filtration, there are many new systems that can perform tertiary treatment for far less costs to the pocket book or the environment than 20th Century techniques. Wetland filtration would not only filter environmentally harmful substances out of the runoff and waste water but would produce as a byproduct more wetland habitat for our region that is losing it daily. There are many Towns and Cities using 21st Century tertiary treatment techniques successfully for decades; i.e. Arcadia, Calif.</p> <p>2) A good community relations move for OPG would be to adopt the 2013 SMP regulations for this development. In any case, the "Alternative" Plan's variance request of the current "outdated" SMP should be denied.</p>	3/19/13 3/21/2013

Name	Representing	Email Address	Comment	Date
			<p>3) Using the water is what we do around here. A dock would be a nice amenity for the redeveloped town, if it could be done sustainably. There are many environmental concerns that stem from any dock, especially in one of the last fully working estuaries on Puget Sound. After many conversations with the leaders and staff involved with the future permitting of this proposed small public dock on the old mill site I see that there are very real concerns about the “what if’s” of a oil or sewage spill from a boat tied up there. As we all know, “Stupid happens” and preventing a spill from a tribal fishing boat anchored in the bay or a private boat at this proposed dock can always be a threat. There are state laws that make boaters responsible for clean up and damages to habitat or to other parties from spills. But, there are not laws that mandate that all licenses for private boats with gas, diesel motors or heads must have insurance that will cover the clean up and damages from spills. This lack of assurances for clean up and spills needs to be corrected because some owners will go bankrupted from the costs.</p> <p>In the mean time, what can be done to make sure these assurances for this dock are met in the future permitting of this dock? OPG could, as mitigation for this dock, stipulate in its permit application that it will, until licensing includes this insurance, take responsibility by having their own insurance for cleanup and damages for any boat that has a spill at its public dock, regardless if they are licensed or not. . Another stipulation for the dock should be that there is a “spill response boat” and system there on that dock at all times and a manager of that system and boat that can implement containment action quickly.</p> <p>4) Recreation is a big part of this redevelopment. Since a lot of the focus of this plan is trails and water for this town’s amenities, Public access to trails and the beach should be assured with any plan for the town and its waterfront. Public access to the mill site dock should also be assured. Abilities for the public and lot owners to launch kayaks, canoes and row boats easily should be assured. A waterfront building should house facilities for kayak, canoe or row boat club storage and commercial rental/sales. In the town a trails shop should be in the plan for locals and visitors, including bikes and hikes with gear and guides. The equestrian center placement seems to be in a good spot with ample fields for pasturing and facilities for events, boarding and lessons. Livestock runoff will be a concern at the equestrian center, containment and setbacks from the nearby creek should reflect new SMP standards. The developer should take responsibility for care and upkeep of these trails that feed the economic desirability of the development to its owners and visitors. This can be done by funding work by volunteers that can carry on through the transition to County ownership of the Port Gamble Block forest.</p> <p>5) There will be hotel guests, trail users, kayakers, shoppers and lot owners merging with ferry, Olympic Peninsula and Pacific Beach traffic on those busy days in summer. The “Plans” 104 connections look inadequate for this.</p> <p>6) Where is the, and who will pay for the; fire, police and aid cars that a town of this size will require?</p> <p>John Willett Co-Founder KFBC Past-President NKTA</p>	

Name	Representing	Email Address	Comment	Date
Chuimei Ho	Individual	cmho@cinarc.org	<p>Kitsap County DCD, Port Gamble EIS, 614 Division St., MS-36 Port Orchard, WA. 98366.</p> <p>Dear Sir/Madam,</p> <p>I am pleased to hear that there will be environmental plans for improving public use of Port Gamble. I am particularly pleased to hear that consideration will be given to include "changes to historical aspects of the town." Port Gamble played a significant role in Chinese American history. Chinese immigrants lived and worked there as early as 1870 as lumbermen, launderers, crew workers on steamboats, domestic servants, and cooks for ships and hotels. Some were fishermen, living and working side-by-side with the Native Americans of northern Kitsap. Among the laundry people at Port Gamble were a couple, Chin Gee Hee and his wife. Chin Gee Hee later moved to Seattle and became one of the leading Chinese merchants in the United States. He is best known for financing and building a railway in China, having learned how from experience as a railroad contractor for the Northern Pacific. I have heard that there is still a Chinese laundry building standing in Port Gamble. As a Kitsap County resident, I was disappointed to find that neither the current Port Gamble Museum exhibits nor any signs in the neighborhood mention the Chinese presence in the area. Does the county development plan include references to that presence? Will appropriate signage and exhibit space be part of the plan? I sincerely hope so. I am in the course of preparing an article on historical Port Gamble for our Northwest Chinese-focused website, <www.cinarc.org>. Meanwhile, I would be very happy to assist your office in clarifying historical issues regarding former Chinese residents in Port Gamble and their close connections with local Native American.</p> <p>Chuimei Ho</p>	3/21/2013
Lynn Schorn	Individual	lynn@newmotionpt.com	<p>I am a landowner on the west side of Gamble Bay. I believe that the plans submitted to EIS for the development of Port Gamble are comprehensive and have obviously been prepared with elements of a balanced town development.</p> <ol style="list-style-type: none"> 1) I am in favor of the preferred plan of the Mill Site, as I believe that retaining as much water front land as possible is important to the esthetics, environment and health of the Bay. I am in full support of the development of Port Gamble as outlined following all of the environmental impact studies. (I fully support development in town sites in Kitsap County rather than a rural sprawl which encourages more need for driving). 2) One aspect of challenge in my opinion will definitely be traffic related and will require traffic lights, assistance from mass transit bus system, etc.(currently Kitsap Transit does not have any stop in Port Gamble). 3) The development of Port Gamble as a historic town site could lend itself to positive economic impact on Kitsap County as a tourist and recreational hub for future generations. 4) I would be interested in some of the residential areas to encourage low income housing as well to create a diverse community, but don't believe this is involved in this EIS study. <p>Thank you for the opportunity to comment on this Plan. Lynn Schorn</p>	3/21/2013

Name	Representing	Email Address	Comment	Date
Sally Banfill	Individual	sbanfill@oz.net	<p>David Greetham From: Sally Banfill SBANFILL@OZ.NET Sent: Wednesday, March 20, 2013 10:45 AM To: David Greetham Subject: Re: Port Gamble Re-development Project Comments</p> <p>Hi Dave,</p> <p>I just wanted to add that the preferred plan with more open space is the better plan. That's obvious. I didn't comment before because I thought it was a separate issue. DOE needs to make it work with this dock. Why are they being so flip about such an enormous amount of grant money? Is the philosophy "as long as I get my salary out of the process I don't care about anything else?" Hanford is leaking radioactive waste and these guys are quibbling about when to rebuild the dock- boxed in by their own over the top rules. no doubt.</p> <p>Sally Banfill</p> <p>On Mar 19, 2013, at 1:26 PM, David Greetham wrote:> Thanks for the comments Sally. I will add you to our interested parties list for future notices.>> FYI the Comprehensive Plan/Zoning Code language for Port Gamble generally lines up with your architecture comments below. When the "Rural Historic Town" language was drafted (around 1999-2000), it included a requirement that the county to set up a review committee or hire an outside architectural expert to advise and comment on the proposed plans.>> Dave>> David Greetham> Environmental Planner> Kitsap County Department of Community Development Planning and> Environmental Programs Division> 360-337-5777>>>></p> <p>-----Original Message-----> From: Sally Banfill [mailto:SBANFILL@OZ.NET]> Sent: Tuesday, March 19,2013 1:16 PM> To: David Greetham> Subject: Port Gamble Re-development Project Comments>> Hi Dave,>> I wanted to comment on the Port Gamble Project because I believe it has the potential to be one of the best places to live in Washington. The best way to achieve this is to use the existing historic section as a blueprint for all new construction. Great American neighborhoods are made up of quality architecture, landscaping, walk ability, and community. The existing American Gothic/Farmhouse style homes with their charming front porches are all about greeting your neighbors - not hunkering down. Tree-lined streets with sidewalks are just intrinsically good. Having some businesses within walking distance is also an asset. Shared space and getting out of your car is good for the1environment. It's a balanced approach instead of using "density" to ruin old sections of town or "conservancy" to steal rural property, or making it so only retired people can live in rural areas.>> My biggest concern about the project is that if you don't match the architecture you will have destroyed an historic jewel. I also don't want it to be a box store development - we have a glut of those.>> I wish that Pope Resources would have considered matching the historic architecture of Gig Harbor in their south end activities. Gated communities are the antithesis of community. "Let me use your infrastructure but I'm not even going to allow you to look at my home." Suburban cul-de-sacs are just unbearably boring.>> Sincerely,>> Sally Banfill2</p>	3/22/2013

Name	Representing	Email Address	Comment	Date
Mark Barabasz	Individual	n/a	<p>Mark Barabasz 37404 Bay Street NE Hansville, Washington 98340 360447-7296</p> <p>March 16,2013</p> <p>Kitsap County Dept. of Community Development Attn: Port Gamble EIS Scoping Planning and Environmental Programs Division 614 Division St., MS-36; Port Orchard, WA 98366</p> <p>To Whom It May Concern:</p> <p>I live in the Driftwood Key development in Hansville, Washington. This is on the NW tip of Kitsap County and borders Hood Canal. Port Gamble is just a few miles south, also on the Hood Canal.</p> <p>Port Gamble is a village that borders Hood Canal and Gamble Bay and has wetlands and creeks, all of which empty into either Hood Canal or Gamble Bay. There are businesses, vehicle traffic and other commercial enterprises, all of which generate waste which have a strong possibility of ending up in the larger estuary through the creeks or wetlands or runoff from existing impervious surface materials, and more is planned.</p> <p>My home is on a small postage stamp size lot. My back yard borders a small ditch that runs through several back yards to a culvert, which empties into Hood Canal. There is no traffic in my back yard. There are no businesses and no commercial or industrial enterprises. It is a lawn with a ditch. The ditch is bordered on both sides by 25 feet of clearance to which I cannot extend my lawn per county rules. Last year a county land use supervisor explained to me with careful detail why I cannot extend my lawn, or put in a garden. I am only allowed to put in native species of vegetation. I cannot remove any of the existing vegetation, except the blackberry bushes. He explained to me that this ditch is actually a seasonal stream. It gets that designation because the runoff from it, and the several yards it goes through, is channeled into a culvert which empties into Hood Canal. As such, I am now under the jurisdiction of county, state and federal agencies. It was stressed to me that I need to follow these guidelines or be subject to fines. I was not offered any mitigation alternatives. That is at the county level. I cannot even imagine what I would be subject to at the state and federal levels should I not adhere to the guidelines. I was mightily impressed by this, of course, and applaud the county's stringent guidelines to protect our cherished natural resource, Hood Canal.</p> <p>Now, I know that there will be many statements that delve into the more technical aspects of what the county should be reviewing for this EIS, and the dangers to Hood Canal and Gamble Bay by the proposed development plans submitted by OPG. Gamble Bay has the second largest population of herring in the whole of Puget Sound. It is a very important food for an endangered species of salmon. That is only one area that will be impacted.</p> <p>But it is an important one. Our fisheries are in dire straits these days.</p> <p>We are becoming more aware of local activities having a global impact. We have seen radioactive debris on</p>	3/22/2013

Name	Representing	Email Address	Comment	Date
			<p>Washington shores from poor ecological practices thousands of miles away. Now, I am fully conscious of the risks my lawn poses to Hood Canal. You can rest assured the destruction of this beautiful body of water, and the life systems it supports, will not happen at my hands. I am also fairly certain that the risks my lawn presents pale in comparison to what OPO is planning. I humbly ask this review board to simply apply the same stringent standards of permitting to the OPO project that it would apply to me, my lawn and the ditch.</p> <p>Thank you for your support.</p> <p>Sincerely, Mark Barabas</p>	
Betsy Collins	Individual	ewc1035@comcast.net	<p>David Greetham From: Betsy <ewc1035@comcast.net> Sent: Wednesday, March 20, 2013 11:31 AM To: David Greetham</p> <p>Please consider the "no action" option on the OPG proposal for the development of Port Gamble. I feel there are too many unanswered questions, and that this is too huge a project to rush into! Too many times over the years I have seen Pope allowed to do things that damaged the environment.. I do not trust them to live up to their responsibilities or promises, and I don't believe Kitsap County should either. Please put the welfare of our beautiful, irreplaceable Canal and surrounding area before the greed of a corporation! Thank you for your time.</p> <p>Betsy Collins</p>	3/22/2013

Name	Representing	Email Address	Comment	Date
Joyce Willson	Individual	blackfish5@comcast.net	<p>Scope of EIS for Port Gamble Redevelopment Plan Willson</p> <p>Dave Greetham: email: dgreetha@co.kitsap.wa.us</p> <p>Subject: Scope of the Environmental Impact Statement (EIS) for the Port Gamble Redevelopment Plan</p> <p>Thank you for giving me the opportunity to comment on the issues related to the proposed adverse impacts of the redevelopment on Port Gamble Bay, the negative impact it will have on the people of Kit sap County, including the Port Gamble S'klallam Tribe and its cumulative effect on the environment of the Hood Canal where I currently reside with my family. Activities such as vessel traffic waves, and wakes, will destroy the habitat of terrestrial and aquatic species, along with increase risks of spills and release. The cumulative impacts from increased impermeable surfaces, storm water runoff, and shoreline armoring will negatively degrade the natural resources of the Hood Canal watershed over time. The Environmental Impact Statement must analyze the cumulative effects of activities on the Hood Canal Watershed, natural resources and treaty rights.</p> <p>The following are my concerns about the Port Gamble Redevelopment Plan and EIS with recommendations.</p> <p>Respectfully, Joyce Willson 38601 Hood Canal Drive NE Hansville, W A 98340 Phone: 360.638.1960 Email: blackfish5@comcast.net Scope of EIS for Port Gamble Redevelopment Plan Willson</p> <p>Issue: Port Gamble bay is in the process of being cleaned up as required by the Washington State Model Toxics Control Act (MTCA), which includes dredging, piling removal, capping and other activities. Contaminated soil can force more polluted material into Port Gamble Bay through storm water runoff, erosion or wind.</p> <p>Suggestion: The EIS analysis should coordinate with current and future MTCA cleanup/restoration actions.</p> <p>Issue: Five feet of impervious new soil fill proposed by the developer will negatively affect storm drainage.</p> <p>Suggestion: The EIS should provide a geotechnical evaluation of all site grading and fill, including materials, compaction, inspection and interim surface flow patterns.</p> <p>Issue: Increased impervious surfaces of parking lots, roads, sidewalks and trails will add to erosion, loss of riparian habitat from increased water volumes, increase run-off of pollutants into the bay will lead to closure of shellfish beds. Suggestion: The EIS should include a comprehensive assessment of the effects of the proposed impervious surfaces on the hydrologic cycle and water quality.</p> <p>Issue: Stabilizing the fill on the mill site area by applying grass seed is adding an invasive specie to the area that will contribute to the loss of fill into the Bay and will require additional physical structures that would intensify waterward erosion of waves and prevent replenishment of natural sediments. Salmon, herring, shellfish habitat would be degraded without these natural nutrients. Suggestion: The EIS should include a full analysis of shoreline armoring fill stability and erosion control, as well as the function of feeder bluffs and other coastal processes.</p> <p>Issue: Port Gamble shoreline is located within a 100-year flood plain and development will negatively impact</p>	3/25/2013

Name	Representing	Email Address	Comment	Date
			<p>salmon, which is a threatened and endangered species. Suggestion: a) EIS should comply with the national Flood Insurance Policy Biological Opinion requirement for floodplains, b) a comprehensive analysis of placing fill on the site to include ecological functions on salmon, birds and other marine species, c) impacts to marine life and habitats and d) full flood risk analysis.</p> <p>Issue: Any buildings or impervious surfaces within the wetland buffers or adjacent to the wetland complex would have a direct adverse effect on the watershed and Port Gamble Bay and the proposed tracts of the development 942 through 944, and 945, Tracts 932, 937 and 938, Lot 142 are located adjacent to the Machias Creek and wetland complex that connects directly to Port Gamble Bay. Suggestion: EIS should include Section 404 of the Clean Water Act of the proposed development located in wetland buffers and adjacent to the Machias Creek and wetland complex.</p> <p>Issue: Adverse effects of increased runoff containing oils from motor vehicles or household chemicals could received inadequate treatment in the Low Impact Development (LID) process and degrade the water quality of the Bay. Another related issue is manure from the livestock agricultural district that poses a hazard to increasing paralytic shellfish poisoning (PSP) outbreaks and risks associated with direct discharge to Hood Canal And the Bay. Suggestion: The EIS should analyze the risk for contamination from agricultural runoff and address how the operation will not significantly increase PSP outbreaks or exposure to pathogens related to livestock waste. Scope of EIS for Port Gamble Redevelopment Plan Willson</p> <p>Issue: Proposal and location of a Large On-site Sanitary Sewer (LOSS) will discharge wastewater to the ground and to the highly permeable sand aquifer, which is susceptible to contamination. The single sewage treatment system, and the proposed one, is inside the Limited Area of More Intensive Rural Development (LAMIRD), which is a violation of the Growth Management Act (GMA). Further the existing sewer system is inadequate to serve existing needs and has resulted in the closure of a prime geoduck bed, which is a violation of tribal treaty rights. Suggestion: The EIS should include an analysis of the cost of maintaining the LOSS system in the future, the ability of the development to pay the cost of the required expansions and the public cost of maintenance. The EIS should include a full analysis of the LOSS system being proposed identifying threats to ground water and water quality. The EIS should examine the GMA provisions against extension of sanitary sewers and the potential for the proposed system to encourage future rural development and sprawl.</p> <p>Issue: Removal of contaminated toxic soil as part of MTCA cleanup by trucks and barges will be distributed throughout Port Gamble, across the Bay to the reservation that is hazardous to human health and wildlife. Exhaustion from trucks, cars, ships and boats related to construction and redevelopment activities contains polyaromatic hydrocarbons and matter that have a negative impact on human health. Suggestion: The EIS should include an analysis of impacts caused by increased traffic and its potential impacts on local air quality. The EIS should also address dust mitigation technology that will be used during the construction phases.</p> <p>Issue: Alteration of the landscape from development would result in habitat loss and fragmentation, which impacts birds, mammals such as bear, cougar, deer, and other species. Marine and freshwater animals are dependent on health of the entire watershed. Suggestion: The EIS analysis should assess the impacts of the proposed redevelopment on restored upland and aquatic habitats, including vegetation and eelgrass plantings, shoreline restorations, conservation easements, and other activities. The EIS should evaluate upcoming restoration and conservation plans for assessment of redevelopment impacts.</p> <p>Issue: Potential runoff, shoreline structures, overwater structures and wastewater discharge's, increased risk of spills and contamination, increased vessel activity from the proposed development pose a threat to eelgrass and other aquatic vegetations, herring spawn, surf smelt and sand lance (school fish) spawning in the</p>	

Name	Representing	Email Address	Comment	Date
			<p>near shore areas. Chinook salmon, steelhead and other finfish species is at risk along with shellfish, horse, littleneck, butter and manila clams, oysters, and geoduck. Suggestion: The EIS should evaluate the potential impacts of the proposed redevelopment on these aquatic resources and the increased risk for closure of shellfish beds due to potential impacts to water quality.</p> <p>Issue: Increase in road traffic that is congested at peak hours of the day plus backups as a result of the Hood Canal Bridge. A "Future Bypass could address some of the problems: Suggestion: The EIS should analyze impact of new development on the transportation network in light of existing congestion and the operation of the Hood Canal Bridge. The EIS should also fully analyze the need for and timing of the construction of the "Future Bypass."</p> <p>Issue: Increase in aquatic vessel traffic will contaminate aquatic habitat and water quality in Port Gamble Bay, demand for docks and moorage will increase vessel traffic contributing to a loss of loss of aquatic habitat negatively impacting shellfish, herring and other forage fish, and salmon, which is a violation of tribal treaty rights. Suggestion: The EIS should fully analyze the full extent of the impacts from construction and redevelopment. The EIS should identify the number of construction barges and other vessels on site at anyone time and the specific locations where these vessels will be parked during construction. The EIS should include a comprehensive analysis of the project increase in vessel activity associate with the proposed development, as well as direct impacts to tribal fisheries.</p> <p>Issue: Soil samples taken from the mill site upland areas indicate the presence of Dioxin/Furan that exceed Ecology standards for human health. The current MTCA cleanup action is not complete and therefore the toxins continue to exist in the soil where redevelopment is planned. Suggestion: The EIS should address the significant impacts of the upland contamination on humans and wildlife and should consider any alternatives that would eliminate these potential risks to human health or require the completion of the upland cleanup before construction and permitting begins.</p> <p>Issue: The location of the cleanup disposal facility, and its size and design is not stipulated and could pose hazardous conditions to human health if not evaluated and planned properly. Suggestion: The EIS should include an analysis of potential risks to human health and wildlife from the proposed redevelopment near the planned disposal facility, as well as the potential for runoff, trespassing, and wind conditions associated with the facility and the redevelopment plans.</p> <p>Issue: Construction and redevelopment operations will increase noise levels for nearby residents and wildlife, during off-hours and nighttime, disrupting local residents and tribal fisheries. Suggestion: The EIS should include an analysis of noise levels for compliance with Environmental Protection Agency requirements. Nearby residents, fishers and harvesters should be informed of any noise levels exceeding those considered hazardous and those anticipated during nighttime construction. The EIS should address mitigation measure that would be used to negate noise impacts.</p>	

Name	Representing	Email Address	Comment	Date
John Sledd	Individual	johnsledd@comcast.net	<p>From: johnsledd@eomeast.net Sent: Wednesday, March 20, 2013 5:02 PM To: <i>David Greetham</i> Subject: Port Gamble EIS Scoping</p> <p>Dear Mr. Greetham: I have a few personal comments on the EIS scoping, not made in any representative capacity. Generally, the scoping notice captures the areas I see as most likely significant impacts. I would also address risks of earthquake and liquefaction of the fill at the millsite -- both the existing fill, which is probably full of organic material and contaminants, and whatever is proposed to be placed new. I would also consider conflict of additional vessel traffic drawn to the development with fishers, both commercial and recreational ones like me. Finally, as someone whose own beach has been contaminated by runoff, I would address the impacts of the agricultural operation and other development including runoff of fertilizer and pet and livestock waste. Thanks. John Sledd 8002 Illiahee Rd NE Bremerton, WA 98311</p>	3/25/2013
Ben Salerno	Individual	bdsalern@sprynet.com	<p>From: Katrina Knutson Sent: Tuesday, March 12, 2013 11:23 AM To: David Greetham Subject: FW: You have a new case! CRM:0015000001350</p> <p>From: Dana Crompton Sent: Tuesday, March 12, 2013 11:10 AM To: Katrina Knutson Subject: You have a new case! CRM:0015000001350</p> <p>This case was forwarded to you from CRM and requires your action. Please advise on the course of action by replying to this email. PLEASE DO NOT CHANGE THE SUBJECT LINE OF THE EMAIL OR DELIVERY WILL BE DELAYED. If you have questions or need assistance, call Kitsap One at 360-337-5777.</p> <p>Case #KC-28758-14XC96 Created on: 3/11/2013 1:49 PM Subject: Community Planning Case Owner: Holly Cremeans Customer: Ben Salerno Phone: 360-930-8130 Secondary Phone: Email: bdsalern@sprynet.com Location of concern: Nearest Cross Street: Parcel Number: Description of concern: **Mr. Salerno has sent a second email regarding the same project, please see attached for a copy of the email.LS 3/12/13*** email received by Kl;</p>	3/25/2013

Name	Representing	Email Address	Comment	Date
			<p>The development of Port Gamble does not adequately address the increased traffic flow along State Route 3. This route is already congested, especially during early morning and evening hours, and specifically, any time the Hood Canal Bridge traffic must stop for passage of ships and submarines. Presently, there are times when the egress and ingress is prohibited for those neighborhoods located along State Route 3 between Big Valley Rd and the Hood Canal Bridge due to vehicle passage blocked by heavy or stopped traffic. These neighborhoods have no alternative route in or out and must use State Route 3. This condition is not only an inconvenience, but impacts safety for the residents of these neighborhoods. The additional traffic any development of Port Gamble would bring would only worsen an already dangerous situation. Only if the development plan also includes proper mitigation for the increased traffic over this section of State Route 3 - or- includes the major project of building a new State Route 3 through the undeveloped land and allow the present State Route 3 to become a secondary road for residential use, should the development of Port Gamble be considered.</p> <p>Ben Salerno CDR USN (RET) Follow up needed by: 3/14/2013 1:49 PM</p>	

Name	Representing	Email Address	Comment	Date
Patricia Endresen	Individual	endresen@msn.com	<p data-bbox="625 133 1129 293">From: Patricia Endresen endresen@msn.com Sent: Wednesday, March 13, 2013 3:13 PM To: Kitsap1 Cc: Patricia Endresen; evanstj1@hotmail.com Subject: Port Gamble Scoping Process</p> <p data-bbox="625 326 1808 423">As Kitsap County enters the environmental impact analysis for Olympic Property Group's (OPG) proposal to redevelop Port Gamble, we urge the County and OPG to pay particular attention to an environmental impact that often escapes scrutiny - light pollution.</p> <p data-bbox="625 423 1818 683">Our family has lived on the southern shore of the Twin Spits area of North Kitsap since 1949. We look directly south to Port Gamble, some four nautical miles across Hood Canal. Not so long ago, our night sky to the south was characterized primarily by the distant glow of the lights from Seattle. In recent years, however, that glow has been replaced by the much more prominent glare of the lighting fixtures adorning Port Gamble's streets and buildings. We are frequent visitors to Port Gamble and its businesses, so understand that the fixtures themselves are attractive and architecturally consistent with the town's historical identity. The problem, however, is that Port Gambles' lighting designers appear not to have anticipated the amount of light that bleeds away from the town itself, and is now readily visible miles away across Hood Canal.</p> <p data-bbox="625 683 1824 976">Fortunately, this is an easy negative environmental impact to remediate. Many design solutions to mitigate light pollution have been successfully employed by other communities in rural areas that are committed to protecting the visibility of their night skies. Without significant expense, these solutions could be retrofitted to Port Gamble's existing structures and fixtures. More important, OPG is in a unique position as Port Gamble's developer to prescribe a set of lighting design criteria to be incorporated in all future construction at the site. Using such design criteria as downward directed lighting, shielded fixtures, specific spectrum lights, and limited signage would help unify the identity of Port Gamble's commercial uses and public areas. In addition, these design criteria would create a unique and low impact feel throughout the new residential neighborhoods OPG hopes to establish.</p> <p data-bbox="625 976 1818 1105">Securing OPG's commitment to pay careful attention to the potential for light pollution and to overlay lighting design criteria on its site right from the beginning could avoid the future development of Port Gamble from becoming a major blight on Hood Canal's shore, visible and irritating to hundreds of its neighbors in North Kitsap.</p> <p data-bbox="625 1105 1014 1227">Regards, Trevor Evans and Patricia Endresen 2619 NE Twin Spits Rd Hansville, WA 98340</p>	3/25/2013

Name	Representing	Email Address	Comment	Date
Marilyn Bode	Individual	lidenbode@aol.com	<p>From: lidenbode@aol.com Sent: Tuesday, March 19, 2013 2:24 PM</p> <p>To: David Greetham Cc: Robert Gelder; Charlotte Garrido; jbrown@co.kitsap.wa.us Subject: My comments on the scope of the EIS for the Port Gamble <i>development</i> Kitsap County Department of Community <i>Development</i></p> <p>Attn. <i>David</i> Greetham 614 Division St. MS-36 Port Orchard, WA 98366</p> <p>To whom it may concern: What makes an action "significant?" How is the peril our environment is now in a result of "insignificant" environmental impact decisions in the past? The county hearing examiner, county commissioners, developers and their shareholders all impact the scope of the EIS. We community members and the earth itself must be heard as to what is significant. I was encouraged to see the list of 12 key areas Kitsap County, as the lead agency under SEPA, will be addressing as likely <i>adverse</i> impacts on the environment the OPG proposal may <i>have</i>.</p> <p>Our history of exploitation of the earth's resources through thoughtless opportunistic development thus environmental degradation has wrecked <i>havoc</i>. Terms used by Olympic Property Group in their proposal like "Substantial Development Permits" and "Technical Deviation" remind me of past development activities. Too often the findings in an EIS turn out "insignificant." Hood Canal, Puget Sound, Gamble Bay are an environmental disaster because somewhere down the line development was deemed "insignificant" in an EIS. This is obvious to me having <i>lived</i> on Apple Tree Cove, Kingston, for 70 years. The developments on the uplands from the Post Office to the Village Green and also the breakwater and the marina, <i>have</i> had a significant impact on Apple Tree Cove. Storm water run off, sewer construction, dredging, location, and use of the marina and breakwater, the new "slough" bridge, have had unexpected impacts. My low point property is now a wetland due to the lack of surface water management by the county over many years.</p> <p>My list of significant impacts regarding Port Gamble and Port Gamble Bay includes increased boat, vehicle, plane, and motorized water sports traffic resulting in water, air and noise pollution in a currently quiet rural community. No matter what is designed, surface and storm water run off and erosion seems to elude the expertise of Kitsap County. Hood Canal and Gamble Bay must not receive run off which would be laced with additional vehicle waste, and lawn and landscape fertilizer. Carbon footprint will be increased with more wood stoves, fireplaces, barbecues, lawnmowers, weedeaters, leaf blowers. Then there is digging, grading, filling in order to build on the flood plain which already is fill, and on the shoreline It all adds up and taken as a whole impact, not just piece by piece it will be significant.</p> <p>Perhaps the most critical in my thinking and that of fisheries management experts is the significant impact of development on the endangered salmon resource. . According to a white paper by orcanetwork.org, the rights of western Washington treaty tribes to harvest fish and shell fish are at grave risk."Stopping habitat degradation on fish bearing streams is the cornerstone of salmon recovery, but habitat is still declining.</p>	3/25/2013

Name	Representing	Email Address	Comment	Date
			<p>Habitat degradation continues steadily, destroying the salmon resource and along with it the cultures and communities of the treaty tribes of western Washington." Since the 1970's Boldt Decision as a non-Indian ally I have been aware of how fragile the affirmed treaty right of Tribes to harvest half the salmon resource is when the resource is in such peril. Non-Indians must respect for our half of Treaty obligations and not put up any more with our broken promises. Tribes are being accountable and doing their share to promote recovery. This is the work of Northwest Indian Fish Commission. Billy Frank, esteemed Executive Director says fishing rights are a civil right. Recovery is what must be sought, not just maintenance of productivity. This is also the work of the Point No Point and the Point Elliot Treaty Councils. With two Tribes in Kitsap County and more in our Puget Sound area Kitsap County is obligated to see that treaties are upheld and development does not further degrade the environment. The ideas, expertise, and treaty rights of the affected tribes must be respected and paramount in decisions about Port Gamble's future.</p> <p>Everyone, each citizen, each living thing on earth has an individual view of what is "significant" to them. At this time and place very little is "insignificant" when it comes to the environment, which is in direct opposition to powerful pro- growth pro- economic development forces.</p> <p>Respectfully, Marilyn Bode P.O. Box 819 Kingston. WA 98346</p>	

Name	Representing	Email Address	Comment	Date
Craig Jacobrown	Individual	n/a	<p>March, 16 2013</p> <p>Kitsap county Dept. of Community Development Attn: Port Gamble EIS Scoping Planning and Environmental Programs Division 614 Division St., MS-36; Port Orchard, WA 98366</p> <p>Craig Jacobrown PO Box 421 Indianola, WA. 98342</p> <p>Dear Commissioners,</p> <p>I belong to a working group that wants to become stewards of the Kitsap community commons, the part of our beautiful part of the country that will be attractive to people with quality hearts and minds whether they are visiting here as tourists, moving here to live with their family or purchasing land zoned for a resort hotel. We do not want to attract any more tourists, residents or businesses who are not able to act In harmony with the local culture and environment. The current EIS process for the Port Gamble town site Is potentially momentous. We all know that here In our little corner of our county, the vision is emerging of our community. Every one lives in or near beautiful waterfront towns, beautiful forests with trails that connect each town, like any islander- beautiful water connecting us to each other and providing further recreation and livelihood. Moreover the deep rich culture and history of this region spans thousands of years and Is clearly a potent guide post for our future cultural tenor.</p> <p>The first phase of the EIS should enthusiastically pursue a thorough study of the Indigenous history of the first people’s communities that can be uncovered In the shoreline sands. If It Is verified that the town has thousands of years of history and culture to explore, a museum and park should be planned and built with such unique attraction that it's fame alone can raise the value of property In this town. This vision that Is emerging must show deep respect for all the parties Involved Including the Suquamish who, just like the Port Gamble S'Klallam, from their own perspective, were devoted stewards of this corner of our county. Simultaneous with this research phase of the EIS we must remove all toxic dock posts that remain in Gamble Bay and clean up all the surrounding environmentally sensitive areas. Only after these two phases are well underway or complete can any further development be planned for the Gamble Bay. As county properties are being secured for the long term future we can crystalize the vision of a cultural and environmental gathering place on the Port Gamble waterfront that will pay homage to the culture and the ancestors who still occupy the territory and the modern day flora and fauna that have proved beneficial and resilient throughout the centuries.</p> <p>Maybe we can create a whole Town around the concept and culture of reverence for Trees. The current museum has done a pretty good job of starting us down that path; the PGS Tribe and/or the Suquamish could take us considerably further.</p> <p>Please clean up the Bay and study the archaeology of the region and insure against any further damage to the environment before accepting any development plans from the property owners.</p>	3/25/2013

Name	Representing	Email Address	Comment	Date
Bruce McCain	Individual	n/a	<p data-bbox="625 133 1835 267">Kitsap County Department of Community Development Attn: David Greetham, MS-36 614 Division St. Port Orchard, WA 98366</p> <p data-bbox="625 300 1835 397">6622 NE Middle St. Suquamish W A, 98392 March 13,2013</p> <p data-bbox="625 397 1835 430">Re: Comments on the scope of the EIS for the Port Gamble Redevelopment Plan</p> <p data-bbox="625 462 1835 495">Dear Mr. Greetham:</p> <p data-bbox="625 495 1835 690">I would like to thank you again for the opportunity to view the application materials for the subject plan. Being a retired fishery biologist, I am most interested in assuring that the EIS addresses the protection of marine species in Port Gamble Bay and Hood Canal. In particular, I am concerned about herring because the Bay and nearby Canal have some of the largest populations of herring in Puget Sound. The redevelopment site is surrounded by herring spawning sites in nearshore areas. Surprisingly, I did not find any mention of herring and the potential effects of the redevelopment options on herring in the application materials.</p> <p data-bbox="625 690 1835 917">Scientists at NOAA Fisheries NW Fisheries Science Center in Seattle (my former employer) have demonstrated that petroleum hydrocarbons associated with surface water runoff cause lethal and sub-lethal effects in herring embryos. Herring spawn on sea grasses around Port Gamble Bay and Hood Canal between January and March, and the eggs hatch a few weeks later. This area receives some of its heaviest rainfalls during this time period. Research conducted by the above scientists and others have also demonstrated that contaminants in surface water runoff adversely affect juvenile and adult salmon. The entire shoreline of Port Gamble Bay is considered to be critical habitat for the threatened summer-run chum salmon.</p> <p data-bbox="625 917 1835 1144">According to the Plan's Preliminary Drainage Report, surface water run-off will be discharged directly into salt water via outfalls with no flow control. The Plan states: "No evidence of surface water contamination was observed during site visits." It seems to me that this statement is meaningless because the Plan calls for extensive parking lots and road systems which will accumulate the types of contamination mentioned above. I am concerned that in spite of OPG's current Plan to control the release of contaminant-laden surface water runoff into the seawater surrounding the proposed development on the Old Mill site will fail. This failure will likely be due to a combination of the climatic, geologic and environmental factors.</p> <p data-bbox="625 1144 1835 1469">To the Plan's credit, the proposed features of their drainage system will include detention facilities, storm water filters, and outfalls. In the preferred design, the primary outfall will discharge into Hood Canal. The Canal also has extensive herring spawning areas. Unfortunately, the alternate plan will include outfalls into both the Canal and the Bay. These features will be designed by standard modeling procedures. Special attention needs to be paid to evaluate the accuracy of these procedures because the development of the Old Mill Site involves a number of extreme conditions. For example, the Old Mill Site is designated a special flood hazard area in a Kitsap County Flood Insurance Map. With climate change, "100-year floods" are occurring much more frequently. Also, at least 60 % of the Old Mill Site will have impervious surfaces. Finally, most of the Old Mill Site will be built on contoured fill which could be eroded during heavy precipitation, allowing direct flow into salt water.</p> <p data-bbox="625 1469 1835 1497">In conclusion, Kitsap County is fortunate to have a thriving ecosystem in Port Gamble Bay and nearby Hood</p>	3/25/2013

Name	Representing	Email Address	Comment	Date
			<p>Canal. This ecosystem will likely be enhanced once the DOE-led clean-up of the Bay is completed. It is critical that the County take every precaution to assure that this proposed massive redevelopment project does not jeopardize key elements of this ecosystem.</p> <p>Sincerely, Bruce B. McCain, PhD</p>	
Tom Nevins	Individual	tenevins@earthlink.net	<p>From: Tom Nevins <tenevins@earthlink.net> Sent: Tuesday, March 19, 2013 1:04 PM To: David Greetham Cc: Patty Charnas Subject: EIS Port Gamble Scope</p> <p>Dave,</p> <ol style="list-style-type: none"> 1. Bluff stability/failure consequences for the north and east bluffs: Increased impervious may actually improve stability if stormwater is directed away from the area. Or, The predicted increased storm intensity of the future may cause instability. Given that there will be buildings/homes at the foot of the bluffs, concern should be noted. 2. The most intense development allowed by the zoning should be one of the alternatives, or a master plan agreement from which deviations would be very difficult should be recorded. 3. Increased Slope failure possibility should be studied on the western area where waste water drain field will be located. <p>Tom</p>	3/25/2013

Name	Representing	Email Address	Comment	Date
Jagdish Sharma	WA Commission on Asian Pacific American Affairs	capaa@capaa.wa.gov	<p>The State of Washington COMMISSION ON ASIAN PACIFIC AMERICAN AFFAIRS 210 11th Avenue SW RM 301A • MS 40925 • Olympia, Washington 98504-0925 PH: 360.725.5667 • FX: 360.586.9501 • EM: capaa@capaa.wa.gov • WS: www.capaa.wa.gov Improving the lives of Asian Pacific Americans</p> <hr/> <p>Agency Overview The CAPAA was established by the state legislature in 1974 to improve the well-being of Asian Pacific Americans (APAs) by ensuring their access to participation in the fields of government, business, education, and other areas. It has a board made up of 12- governor appointed members that represent the diverse APA communities of Washington State.</p> <p>March 19, 2013 Kitsap County Department of Community Development Port Gamble EIS Scoping Planning and Environmental Programs Division 614 Division St. MS-36 Port Orchard, WA 98366</p> <p>Dear Mr. David Greetham:</p> <p>The Washington State Commission on Asian Pacific American Affairs (CAPAA) supports the inclusion of the historical significance of the Chinese community and the preservation of Chinese artifacts in the Environmental Protection Agency’s Environmental Impact Statement on the development of Port Gamble.</p> <p>The Commission is committed to improving the well-being of the Asian American and Pacific Islander (AAPI) community by ensuring their access in the fields of government, business, education and other areas. We respond to the needs of the AAPI community by working with the community, Governor, State Legislature, federal, state and local agencies on implementation of coordinated policies and plans. The Commission is committed to supporting our State’s diverse cultural history as well as cultivating and nurturing relationships between AAPI communities and agencies.</p> <p>We understand that Chinese immigrants have been a part of Port Gamble’s history since the mid-1800s, having contributed to the growth of the town. We appreciate the Kitsap County Department of Community Development and the Environmental Protection Agency for their work on the development of Port Gamble. Further consideration on the inclusion of the historical significance of the Chinese community and artifacts in the Environmental Impact Statement ensures that AAPI concerns are addressed.</p> <p>Sincerely, Jagdish Sharma Justin Chan Chair Executive Assistant</p>	3/25/2013
Doug Chin	OCA – Greater Seattle (Organization of Chinese Americans)	n/a	<p>David Greethan Kitsap County DCD 614 Division Street (MS-36) Port Orchard, W A. 98366</p>	3/25/2013

Name	Representing	Email Address	Comment	Date
			<p>OCA Greater Seattle P.O. Box 14141 Seattle, Washington 2013</p> <p>March 20, 2013</p> <p>Subject: Port Gamble Development EIS</p> <p>Dear Mr. Greethan:</p> <p>We understand that plans have been submitted to develop Port Gamble and that Kitsap County will be preparing an environmental impact statement on that plan. We ask that the County take into consideration in the EIS the presence of Chinese at Port Gamble and that any artifacts from the Chinese found during the development process be preserved and the role of the Chinese be acknowledged. Port Gamble is significant to the legacy of Chinese Americans because it was where the first group of Chinese were contracted to work in Washington Territory. Indeed, in 1857, Chinese were contracted from San Francisco to work at the Port Gamble mill.</p> <p>Subsequently, Chinese worked and lived in the mill town of Port Gamble over the next 60 years or so, working not only as laborers but as servants, laundrymen, cooks and timekeepers. We understand that a Chinese resided there at separate quarters, which may still exist.</p> <p>Thank you for your consideration.</p> <p>Sincerely, t}}&/Aj~ Doug Chin OCA-Greater Seattle President</p>	
Ron Landon WSDOT	WSDOT	n/a	<p>March 18,2013</p> <p>Mr. David Greetham Kitsap County Dept. of Community Development Planning and Environmental Program Division 614 Division St., MS~36 Port Orchard; WA 98366</p> <p>Olympic Region Headquarters 5720 Capitol Boulevard. Tumwater P. O. Box 47440 Olympia WA 98504-7440 360-357-2600 Fax 360-357-2801 nv: 1-800-833-6368 www.wsdot.wa.gov</p>	3/25/2013

Name	Representing	Email Address	Comment	Date
			<p>RE: Port Gamble Redevelopment Environmental Impact Statement (EIS)</p> <p>Dear Mr. Greetham:</p> <p>Thank you for allowing the Washington State Department of Transportation (WSDOT) the opportunity to comment on the scoping process for the Port Gamble Redevelopment Environmental Impact Statement (EIS). WSDOT looks forward to working with the county during its environmental impact review for the Port Gamble Redevelopment and asks that the review team take advantage of seeking input from WSDOT. The following comments are provided for your consideration.</p> <p>State Route (SR) 104 provides the primary access to the Port Gamble area as well as for regional traffic on the North Kitsap Peninsula. WSDOT will be interested in what impacts the proposed redevelopment would have and minimizing those impacts to the state facility. WSDOT will want the opportunity to review and comment on any traffic analysis and results that is conducted during the EIS process.</p> <p>Any traffic analysis should focus on the full build out of the development program; further we would recommend that the analysis area limits include the intersections at SR 104 at SR 3 to the west and SR 104 at SR 307 to the south. It is through these intersections that traffic has to pass to access the Port Gamble area; beyond these intersections SR 104 essentially becomes a closed system since there is no other outlet to the overall area other than these intersections. We are interested in subsequent impacts to these locations.</p> <p>To ensure that this state facility continues to operate efficiently WSDOT is interested in minimizing any potential proliferation of access breaks along the state route. Also any proposed non-motorized facilities or amenities located within the State highway right-of-way shall meet all applicable WSDOT design standards.</p> <p>Thank: you for the opportunity to comment on this scoping process and we look forward to working with the County in regards to this study. Please contact Dale Severson, of my office at (360) 357-2736 if you have any questions or would like to discuss any of these comments.</p> <p>Sincerely, Ron Landon, P.E. Transportation Planning and Program Manager WSDOT, Olympic Region RL:dlj GK</p>	

Name	Representing	Email Address	Comment	Date
Gregory Griffith, Deputy State Historic Preservation Officer	Washington State Department of Archeology and Historic Preservation (DAHP)	n/a	<p data-bbox="625 133 772 164">April 8, 2013</p> <p data-bbox="625 196 1318 358">Mr. David Greetham Environmental Planner Kitsap County Department of Community Development, MS-36 614 Division Street Port Orchard, Washington 98366</p> <p data-bbox="625 391 1262 521">In future correspondence please refer to: Log: 040313-09-KP Property: Port Gamble National Historic Landmark District Re: Scope of Environmental Impact Statement</p> <p data-bbox="625 553 856 584">Dear Mr. Greetham:</p> <p data-bbox="625 617 1822 747">The Washington State Department of Archaeology and Historic Preservation (DAHP) is in receipt of the Notice of Application/Determination of Significance/EIS Scoping Notice of the Port Gamble Redevelopment Plan submitted by Olympic Property Group (OPG). In response, DAHP staff has reviewed the Performance Based Development/Preliminary Plat and provide the following comments/recommendations:</p> <ol data-bbox="625 747 1822 1485" style="list-style-type: none"> <li data-bbox="625 747 1822 812">1. We concur with Kitsap County's Determination of Significance (DS). We also strongly support discussion of historic and cultural resources as a key area of the Environmental Impact Statement (EIS). <li data-bbox="625 812 1822 941">2. Generally, DAHP commends OPG and the County for the overall approach to the redevelopment of the Port Gamble National Historic Landmark (NHL) District. We recognize and appreciate the effort that has been devoted by OPG, the County, and many other interested parties to assure preservation of the District while allowing for sensitive and appropriate new construction. <li data-bbox="625 941 1822 1006">3. Please be advised that DAHP will need to see the original cultural resources survey report in addition to the summarized version of the survey that will become part of the EIS. <li data-bbox="625 1006 1822 1071">4. Complete cultural resources survey reports should be sent to DAHP and the affected Tribes prior to release of the final EIS, and prior to any ground disturbing activities commencing on any part of the redevelopment. <li data-bbox="625 1071 1822 1136">5. Archaeological site inventory forms must be submitted to DAHP in advance of the final report, and Smithsonian trinomials (site numbers) must be incorporated into the final report text. <li data-bbox="625 1136 1822 1201">6. DAHP will review the report(s) and inform the applicant when an excavation permit from this office is required. <li data-bbox="625 1201 1822 1364">7. In our review, we have not come across text or narrative that addresses how the redevelopment plan and process will affect and manage archaeological properties, cultural resources, and cultural landscapes in the District and other areas proposed for new construction. Therefore, in addition to discussion in the EIS, we recommend that OPG's Performance Based Development be revised to include how these resources will be approached from both a policy as well as procedural basis. <li data-bbox="625 1364 1822 1461">8. Furthermore, our initial review of the Performance Based Development document leads to our support of the language that recognizes the District's historic and architectural context and builds upon these as the basis for new development. <li data-bbox="625 1461 1822 1485">9. An initial look at the proposed Rural Historic Town Waterfront (RHTW) raises questions about the visual 	4/8/2013

Name	Representing	Email Address	Comment	Date
			<p>and architectural relationship between the RHTW and the Historic District on the bluff above. A preliminary recommendation is the overall plan could be strengthened by closer connection between the RHTW and the Rural Historic Town Commercial areas in terms of building and site design.</p> <p>10. Finally, we recommend that a meeting between the SHPO, DAHP staff and OPG, project planners and the County would be beneficial. The purpose of the meeting would be to gain a better understanding of the details and specific aspects of the plan. Topics should include an explanation of proposed new parking and circulation patterns; location of new construction in relationship to historic properties; preservation of historic landscapes and management of new landscaping; design guidelines for new construction; identification and protection of archaeological and cultural resources, and anticipated approach to long-term development and management of the community.</p> <p>Again, thank you for the opportunity to review and comment on the Scope of the EIS for the Port Gamble Redevelopment Plan. We look forward to working with the County, OPG, and other interested parties as the project review process moves forward. Feel free to contact me should you have any questions and/or to arrange for a meeting about the project.</p> <p>Sincerely,</p> <p>Gregory Griffith Deputy State Historic Preservation Officer</p> <p>C: Hank Florence, National Park Service Josh Wisniewski, Port Gamble S’Klallam THPO</p>	

Name	Representing	Email Address	Comment	Date
Christine DeGeus	Kitsap County Public Works – Traffic Operations	cdegeus@co.kitsap.wa.us	<p>From: Christine DeGeus Sent: Wednesday, March 20, 2013 7:17 AM To: David Greetham Subject: FW: Port Gamble Redevelopment Plan</p> <p>David, Below are my comments on the Port Gamble Redevelopment Plan. I sent them to Shawn on March 14, 2013 as this is my usual point of contact at DCD. Sorry if there was a misunderstanding. My comments are very similar to Greg's. Let me know if you have any questions. Christine DeGeus Traffic Operations Supervisor Kitsap County Public Works 360-337-7217 cdegeus@co.kitsap.wa.us</p> <p>From: Christine DeGeus Sent: Thursday, March 14, 2013 12:43 PM To: Shawn Alire Cc: Jeff Shea Subject: Port Gamble Redevelopment Plan</p> <p>I have reviewed the Port Gamble Redevelopment Plan submittal dated March 5, 2013 and have the following comments:</p> <ol style="list-style-type: none"> 1. The Preliminary Transportation Assessment prepared by Transpogroup, dated January 10, 2013 did not include 2023 background traffic volumes or LOS for reference. Future submittals should include figures depicting existing, future background and future background with project volumes for clarity. 2. The 1st paragraph, page 4, refers to Pacific Avenue and it should be Puget Way. 3. The report discussed roundabout operations, but did not include supporting analysis for verification. 4. While most of the internal roadways are private, Carver Drive, Gamble Way, and Power Drive are County roads. The existing Carver Drive and Gamble Way roadways should be improved to match Road A cross sections on RD1. Power Drive should be improved per Kitsap County Road Standards for rural roadway sections with 3-foot minimum shoulders for pedestrian use. 5. Consider providing a turnaround where Carver Drive will transition from a public road to a private road. <p>If you have any questions, please feel free to contact me.</p>	3/25/2013

Name	Representing	Email Address	Comment	Date
Jeffrey Griffin	Kitsap County Fire District 18	n/a	<p>David Greatham - Kitsap County</p> <p>The Poulsbo Fire Department Kitsap County fire district 18 has reviewed the materials provided to us describing the substantial redevelopment of Port Gamble. The project as described involves substantial redevelopment and construction of single family residences as well as the creation of a destination center that includes new commercial retail, transient accommodations (hotel) and shoreline development. The proposed redevelopment is expected have an impact on the fire district's call volume and will create very urban development in an otherwise rural setting. Port Gamble currently lacks a water supply for firefighting purposes, most of the buildings are unprotected and access for fire apparatus is limited - all of which will be negatively impacted with more intense development. The district's fire response to Port Gamble is established according to the rural nature of the setting that exists today and redevelopment will significantly impact the district's ability to provide fire and emergency medical responses. For these reasons the district asks that the Environmental Impact Statement include measures that address the district's fire protection concerns and the impact this redevelopment will have on the district's ability to provide fire and emergency medical service.</p> <p>Most respectfully, Jeffrey Griffin, Fire Chief</p>	3/25/2013
Roma Call	Port Gamble S'Klallam Tribe – Natural Resources Department	n/a	<p>PORT GAMBLE S'KLALLAM TRIBE NATURAL RESOURCES DEPARTMENT 31912 Little Boston Rd. NE – Kingston, WA 98346 March 20, 2013 Attn: Dave Greatham MS-36, 614 Division St., Port Orchard, WA 98366 Subject: Scope of the Environmental Impact Statement for the Port Gamble Redevelopment Plan</p> <p>Dear Mr. Greatham,</p> <p>Thank you for the opportunity to comment on the scope of the Environmental Impact Statement (EIS) for the Port Gamble Redevelopment Plan. The Port Gamble S'Klallam Tribe is highly concerned that the proposed plan will have significant adverse effects on natural resources and treaty rights in Port Gamble Bay and the surrounding area. We look forward to working with Kitsap County to ensure that the EIS will effectively address these concerns.</p> <p>I. Effects on Tribal and Treaty Interests</p> <p>Fish, shellfish, and other natural resources have sustained the Tribe's members and culture since time immemorial. The Tribe asks first and foremost that the EIS take the required hard look at these impacts, implement maximum mitigation, and seriously consider the no-action alternative and the restoration and preservation alternative proposed by the Tribe below.</p> <p>A. Background on the Tribe's Use of Port Gamble and Its Resources</p> <p>The Port Gamble S'Klallam Tribe is the successor in interest to Indian bands and tribes signatory to the 1855 Treaty of Point No Point, 12 Stat. 933.1 According to S'Klallam oral traditions, the ancestral Port Gamble</p>	3/25/2013

Name	Representing	Email Address	Comment	Date
			<p>people lived in the area of the level, sandy spit on the west shore of the mouth of Port Gamble Bay. Since the Port Gamble Mill was built, Port Gamble people have lived across the Bay from the mill and town. Their community is the closest to the proposed development and will be the most effected. Like other Washington treaty tribes, the S’Klallam people relied on their fisheries for much of their food supply, pre-dating the signing of the treaty by thousands of years.²</p> <p><i>1 United States v. Washington, 459 F. Supp. 1020, 1039 (W.D. Wash. 1978) (hereinafter Boldt II).</i></p> <p><i>2 See United States v. Washington, 384 F. Supp. 312, 350-53 (W.D. Wash. 1974), aff’d 520 F.2d 676 (9th</i></p> <p>The tribes used all available species of fish, including all six species of salmon, herring and other smaller fish, and shellfish.³ Tribal customs and traditions reflected the importance of the fisheries by proscribing waste, regulating distribution of the catch, and discouraging water pollution.⁴ An annual First Salmon ceremony expressed the people’s appreciation for their harvest.⁵ Trade in fish was a major element of the tribal economy, and the tribes developed a vibrant cultural life based on the wealth of their fisheries.⁶ The Tribe also made extensive use of terrestrial wildlife, waterfowl, and plant materials. Port Gamble Bay and connecting waters provided rich fisheries, and their shores provided abundant plant and wildlife resources. Marine waters also offered the Tribe an easy means of travel. Each summer the S’Klallam dispersed by canoe to camps where they fished, hunted, gathered and met family and friends.⁷ The Treaty reserved to the S’Klallam the right to take fish at all these “usual and accustomed grounds and stations” (U&A)—an area roughly centered on Port Gamble Bay that includes all of the bay, most of the Hood Canal watersheds, and extends west along the Strait of Juan de Fuca to the Sekiu River, north to the San Juan Islands, east to Whidbey Island, and south through Hood Canal.⁸ Within these areas the Port Gamble S’Klallam and other tribes that share the U&A are entitled to take half the harvestable fish and shellfish, and retain the right to access private property to fish and to shellfish.⁹ Today, over 150 years after signing the Treaty of Point No Point, the Tribe retains deep cultural and economic ties to the surrounding waters and to their natural resources. More than ninety tribal members earn all or a portion of their livelihood working as commercial salmon fishermen (PGST 2005-2009 survey). In addition, the Tribe conducts fisheries in its U&A to obtain fish for ceremonial use. Subsistence harvests from the Tribe’s U&A are a key element of the diet of many tribal members. For example, Region 10 of the United States Environmental Protection Agency (EPA) found that the consumption rate for tribal members was approximately 147 pounds of salmon per year, 68 pounds of other fish per year, and 400 pounds of shellfish per year. See <i>Framework for Selecting and Cir. 1975), subst’y aff’d sub nom. Washington v. Wash. Commercial Passenger Fishing Vessel Ass’n, 443 U.S. 658 (1979) (hereinafter Boldt I).</i></p> <p><i>3 Id.</i></p> <p><i>4 Id. at 351, 357.</i></p> <p><i>5 Id. at 351.</i></p> <p><i>6 United States v. Washington, 626 F. Supp. 1405, 1433 (W.D. Wash. 1985); Boldt I, 384 F. Supp. at 350.</i></p> <p><i>7 United States v. Washington, 626 F. Supp. at 1442; Boldt I, 384 F. Supp. at 350-51.</i></p> <p><i>8 See United States v. Washington, 626 F. Supp. at 1442; Boldt II, 459 F. Supp. at 1041.</i></p> <p><i>9 See, e.g., United States v. Washington, 873 F. Supp. 1422, 1444-45 (W.D. Wash. 1994) (hereinafter Shellfish I).</i></p> <p>Using Tribal Fish and Shellfish Consumption Rates for Risk-Based Decision Making at</p>	

Name	Representing	Email Address	Comment	Date
			<p>CERCLA and RCRA Cleanup Sites in Puget Sound and the Strait of Georgia, EPA Region 10, Appendix B, Table B-2 (consumption rates based upon data from the Suquamish Tribe, a neighboring Tribe); see also Fish Consumption Survey of the Suquamish Indian Tribe of the Port Madison Indian Reservation, Puget Sound Region. The Tribe also continues to harvest other resources from lands surrounding its Reservation and the town of Port Gamble, including cedar bark and other plant materials. In recent decades there is resurgent interest in weaving and other use of native plant material. The Tribe’s objective is to enhance and preserve forever its members’ ability to hunt, fish, and gather these traditional resources.</p> <p>B. The Treaty of Point No Point Reserves Perpetual Fishing, Hunting and Gathering Rights to the Tribe, Which Local Governments and Developers Cannot Infringe.</p> <p>A proper conception of treaty rights must begin with the history and purpose of the Treaty. In Article I of the Treaty of Point No Point, the S’Klallam people ceded to the United States most of their rights in their land. However, the Treaty reserves the right of the Tribe to continue to harvest natural resources as before. “Whatever land concessions they made, the Indians viewed a guarantee of permanent fishing rights as an absolute predicate to entering into a treaty.”¹⁰ Federal negotiators, led by Territorial Governor Isaac Stevens, obliged. “I want,” Stevens said, “that you shall not have simply food and drink now but that you may have them forever.”¹¹ Gov. Stevens’ promise regarding the Tribes’ continued access to traditionally-utilized resources is memorialized in Article IV of the Treaty:</p> <p><i>The right of taking fish at usual and accustomed grounds and stations is further secured to said Indians, in common with all citizens of the United States; and of erecting temporary houses for the purpose of curing; together with the privilege of hunting and gathering roots and berries on open and unclaimed lands.</i>¹²</p> <p>¹⁰ <i>Shellfish I</i>, 873 F.Supp. at 1437.</p> <p>¹¹ <i>United States v. Washington, Subproceeding 01-1, No. C70-9213, 2007 WL 2437166, at *11 (W.D. Wash., 2007) (hereinafter Culverts Summary Judgment); see also Washington v. Wash. Commercial Passenger Fishing Vessel Ass’n (Fishing Vessel)</i>, 443 U.S. 658, 667 n.11 (quoting Stevens: “This paper secures your fish”).</p> <p>¹² <i>Treaty of Point No Point, Art. IV.</i></p> <p>The right is not created by the Treaty; rather, the Treaty “secures” pre-existing Indian rights.¹³ In other words, the Treaty of Point No Point did not grant fishing, hunting, and gathering rights to the Tribe; rather, it reserved to the Tribe its pre-existing rights to engage in those activities.¹⁴ This reservation of rights was intended to permanently secure the full breadth of pre-treaty resource procurement practices.¹⁵ Nothing in the treaty language or negotiations suggested, and neither side anticipated, that non-Indian development would ever hinder Indian fishing or deplete the seemingly inexhaustible abundance of resources.¹⁶ The Port Gamble S’Klallam Tribe’s U&A encompass the marine and nearshore areas of Naval Base Kitsap – Bangor and surrounding marine and nearshore areas. The right of the Tribe to access and fish at these places exists regardless of who owns the land beside or beneath the waterway.¹⁷ The ability to access all potential fishing places has been and remains crucial for the tribe to maintain harvest stability in the face of unpredictable local variations in the supply of fish.¹⁸ Maintaining access to the entire terrestrial and marine landscape that was used by tribal ancestors is also of critical cultural importance, and helps to define the Tribe’s identity.</p> <p>The rights that the Tribe reserved in the Treaty are property rights, and like any private property cannot be taken for government use except upon payment of just compensation.¹⁹ Because the</p>	

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			<p>treaties are approved by Congress, only Congress can take or diminish tribal treaty rights – no State, local government, or private actor may do so.²⁰ The treaty right is more than the right merely to go fishing; it is the right to actually fish. <i>See, e.g., United States v. Winans, 198 U.S. 371, 381 (1905).</i></p> <p>¹⁴ <i>Id.</i></p> <p>¹⁵ <i>See Boldt I, 384 F.Supp.at 381("At the treaty council the United States negotiators promised, and the Indians understood, that the Yakamas would forever be able to continue the same off-reservation food gathering and fishing practices as to time, place, method, species and extent as they had").</i></p> <p>¹⁶ <i>Culverts Summary Judgment at 10-11. See also Fishing Vessel, 443 U.S. at 668.</i></p> <p>¹⁷ <i>Winans, 198 U.S. 371 (right to cross fenced, private upland to reach fishing water); United States v. Washington 157 F.3d 630, 644-47 (9th Cir. 1998) (tribes have right to take shellfish on private and State owned lands).</i></p> <p>¹⁸ <i>See Boldt I, 384 F.Supp. at 351-52 (local fish supplies varied, so tribes traditionally shifted fishery locations in response to relative abundance).</i></p> <p>¹⁹ <i>Menominee Tribe v. United States, 391 U.S. 404, 413 (1968).</i></p> <p>²⁰ <i>See, e.g., Confederated Tribes of Umatilla Indian Reservation v. Alexander, 440 F.Supp. 553 (D. Or. 1977) (U.S. Army cannot build dam and flood tribal fishing places, where Congressional authorization does not expressly provide for taking of treaty fishing rights). Federal agencies may, however, regulate treaty fishing where necessary for conservation. See N. Arapahoe Tribe v. Hodel, 808 F.2d 741, 749-50 (10th Cir. 1987); United States v. Eberhardt, 789 F.2d 1354, 1359-60 (9th Cir. 1986).</i></p> <p>Harvest fish.²¹ The purpose of the fishing rights provision is to ensure the tribes sufficient harvest to sustain their livelihood, that is to say, a moderate living.²² Because the tribes must share the fishery “in common” with non-Indians, however, tribal harvest is capped at 50% of the harvestable fish in each run or watershed.²³ Non-Indians may not deprive the tribes of their share of the harvest by monopolizing the catch themselves.²⁴ Neither may they drive tribal harvest down by placing obstructions in tribal fishing places that increase the effort required to take the tribal share,²⁵ or by degrading the habitat needed to support fish populations.²⁶</p> <p>C. The EIS Must Fully Analyze and Address Alternatives and Mitigation to Protect These Tribal Interests.</p> <p>The Tribe is not asking that the EIS determine whether the proposed development would violate treaty rights. The County has no more authority to make that determination than it has the power to alter those rights. The Tribe is asking that the EIS be prepared with the recognition that the proposed development is in the center of the Port Gamble tribal world, and its impacts will ripple through the tribal community far and long. The Tribe is asking that those impacts be assessed thoroughly, in full consultation with the Tribe and with special recognition of the importance that affected lands and treaty resources have to the Tribe’s existence, and of the cumulative burden that development has placed on the exercise of tribal rights. The Tribe is asking that mitigation be developed and implemented creatively and energetically, bending all available legal and technical tools to that task. Above all, the Tribe is asking that the County seriously consider alternatives that would have fewer destructive impacts on the natural and historic character of its homeland.</p> <p>II. Alternatives</p> <p>²¹ <i>Fishing Vessel, 443 U.S. at 678.</i></p> <p>²² <i>Id. at 686 (treaty “secures so much as, but no more than, is necessary to provide the Indians with a</i></p>	

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			<p>livelihood-that is to say, a moderate living”). 23 Hoh Tribe v. Baldrige, 522 F.Supp. 683, 690 (W.D. Wash. 1981). 24 Winans, 198 U.S. 371 (non-Indians may not take all harvestable fish with fish wheels); Wash. Dept. of Game v Puyallup Tribe, 414 U.S. 44 (1973) (non-Indian sport fishery may not monopolize harvest). 25 Muckleshoot v. Hall, 698 F. Supp. 1504, 1509 n.5, 1515 (W.D. Wash. 1988) (proposed marina would occupy U&A and increase the effort necessary to harvest tribal share) 26 Culverts Summary Judgment at 11; see United States v. Adair, 723 F.2d 1394, 1410 (9th Cir. 1983) (reserved treaty right to fish impliedly reserves sufficient water in river to support fishery).</p> <p>Consideration of alternative ways to meet a proposal’s objectives is a central part of SEPA review. Too often, objectives are defined narrowly and dictate narrow alternatives, or alternatives are developed that are mere shadow play for a plan that the proponents clearly favor. The alternative proposal presented by the applicant here is of the latter type, and should clearly be rejected as leading to more, not fewer, adverse impacts.</p> <p>The objective of the proposed action here, so far as the Tribe can ascertain from the application, is to develop Port Gamble into a financially self-supporting community. That objective can be attained through alternatives that would have far less environmental impact than either alternative proposed by the project applicant. The Tribe believes the following alternatives should be considered, in addition to the two contained in the project application.</p> <p>The Restoration and Preservation Alternative</p> <p>The EIS should consider an alternative that maximizes environmental gain, while still enhancing the economic vitality of Port Gamble. The central feature of this alternative should be restoration of the former sand spit that is now the millsite. Many entities including Ecology, the Tribe, and the Hood Canal Coordinating Council and their technical consultants have developed conceptual proposals for millsite restoration that can be built upon, and a variety of possible funding sources exists. Such restoration is feasible and would have enormous benefits to marine and terrestrial resources, and would attract recreationalists and other visitors to the town. Upland development in this alternative should focus on historic preservation and environmental protection, whether in public, non-profit, or private ownership, with minimal additional development as necessary to fund and support the preservation mission. Key elements of this alternative should include:</p> <ul style="list-style-type: none"> • No or very limited structures or impervious surfaces on millsite; all natural vegetation • Any millsite structures dedicated to environmental and cultural resource protection and enhancement • No new in water structures (possible exception for small kayak launching float) • All existing in-water structures, including jetty, removed • Shorelines softened; no new fill on millsite • Upland development • Sewer improvements to adequately serve modestly increased use without spills or permit violations; move marine discharge point to open shellfish beds to harvest • Improved stormwater system (better treatment; discharges away from shellfish beds) • Limited new structures and limited commercial uses with focus on improved historical and cultural 	

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			<p>interpretation and resource protection</p> <p>No-Action Alternative This alternative is required by SEPA. WAC 197-11-440(5)(b). The alternative should assume that current types and scales of uses continue, including on the millsite, so that this alternative will be a realistic approximation of what happens if no new land use permits are approved. That will provide the best vehicle for comparing both the impacts of development and the benefits of the restoration alternative. In particular, the alternative should assume that:</p> <ul style="list-style-type: none"> • Upland uses continue at existing scale and intensity • Millsite uses continue at existing scale and intensity (i.e., small-scale industrial use) but all prior Hearing Examiner conditions on such use (such as buffers) are implemented. • Stormwater and sewer systems are unchanged, except as below. • Regulatory actions other than county land use permitting, which are likely to occur independent of the proposed town redevelopment, should be treated as part of the no-action alternative. Therefore, the alternative should assume that Toxics cleanup and Natural Resource Damage settlements or recoveries result in removal of all pilings and overwater structures, substantial shoreline softening, wide vegetated shoreline buffers, and removal of the current town sewage outfall from shellfish beds. • The County should consider two time frames for the No Action Alternative – a permanent one, and a temporary one pending completion and initial monitoring of toxics remediation and NRD restoration activities and land acquisition efforts such as those under the Forest and Bay Initiative. The latter, “delayed action” sub-alternative is appropriate because information regarding the nature and success of toxics cleanup, NRD, and land acquisition activities is essential to defining the affected environment, evaluating impacts, and choosing among alternatives. WAC 197-11-080 favors delay of actions while such essential information is developed. The delayed action sub-alternative is also required under WAC 197-11-440(5)(c)(vii), which mandates considering the benefits of delaying project implementation. <p>If the proposed action is not delayed in order to develop this essential but missing information, a worst case analysis is required under WAC 197-11-080. The worst case scenario would be maximum development and minimum mitigation, affecting an environment that is maximally remediated, restored, or preserved. Examples would be:</p> <ul style="list-style-type: none"> • Intense development with poor stormwater control, which could recontaminate shellfish beds and marine sediments with fecal material, road runoff, and dioxin contaminated sediment; • Demand for moorage resulting in a large new dock and marina that cause shellfish closures, harm herring and other groundfish, destroy toxic sediment caps with prop wash, and prevent eelgrass & geoduck recolonization in remediated areas; and • The new LOSS is not built or is untimely or inadequate, resulting in continued or worsened discharges to Hood Canal and extended or expanded shellfish closures. 	

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			<p>III. Addressing Potentially Significant Adverse Effects to Cultural Resources</p> <p>Federal and Tribal cultural resource management laws protect irreplaceable cultural resources and historic properties. Local governmental permitting processes are responsible to uphold applicable State and Federal cultural resource protection laws and Tribal consultation requirements. These legal obligations and responsibilities to protect cultural resources, which include consultation with Tribes, are not adequately developed in the Scope of the Environmental Impact Statement for the Port Gamble Bay Redevelopment Plan. Failure to not fully comply with all State and Federal cultural resource management laws can (and has a record of) unnecessary destruction of cultural sites and irreparable cultural harm to the communities whose histories and cultural practices are represented and embedded within cultural sites, such as Port Gamble, Port Gamble Bay and Point Julia. Cultural resources are not limited to terrestrial sites. They can and do include shoreline, nearshore, and intertidal and maritime sites. They include but are not limited to traditional harvest sites, cultural places, landscapes, and archeological sites. They also include natural features of cultural significance that may have no outward cultural significance to those for whom the feature does not bear cultural and historic value but are highly significant to local Tribal members. These resources are protected under Federal State and Tribal laws policies and regulations. These protections and the methods to insure these resources will be protected, including Tribal consultation with The Port Gamble S’Klallam Tribe need to be referenced and clarified within the EIS for the Port Gamble Bay Redevelopment Plan. Failure to attend to cultural Port Gamble Redevelopment alternatives has a high likelihood of impacting the integrity of the Port Gamble Historic Listing designation for the National Historic Register. This needs to be evaluated pursuant to Section 106 of the National Historic Preservation Act. Port Gamble Bay qualifies for the National Register of Historic Places as a Native American Cultural Landscape, as a Traditional Cultural Property and as a Sacred Site for the Port Gamble S’Klallam Tribe. Any proposed redevelopment of the Port Gamble Bay Shoreline, requiring a JARPA review needs to consider the potential any proposed action will have on the integrity of Port Gamble Bay as a cultural resource eligible for the National Register.</p> <p>Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (16U.S.C. §§ 470 et. seq.) requires the identification of historic properties (which include archeological sites and traditional cultural properties) within a proposed project’s Area of Potential Effect (APE). 36 C.F.R. § 800.4(a) states that an APE is to be determined in consultation with the SHPO/THPO. An APE is defined in § 800.16(d) as: “The geographic area, or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”</p> <p>The Advisory Council on Historic Preservation (ACHP) 27 offers further clarification of the definition of an APE stating that In developing the APE for an undertaking, consideration must be given to those effects that will occur immediately and directly as well as those that are reasonably foreseeable and may occur later in time, be farther removed in distance or be cumulative, but still resulting from the undertaking.</p> <p>27 The ACHP is an independent federal agency that promotes the preservation, enhancement, and productive use of our nation’s resources when their actions affect historic properties. The ACHP is the Only legal entity with the responsibility to encourage federal agencies to factor historic preservation into federal project requirements.</p>	

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			<p>The APE is not static but should be adjusted as a federal agency further develops the details of the undertaking and learns more about potential historic properties, and how they may be affected. The input of the consulting parties is crucial to this informed revision and refinement of the APE throughout Section 106 review²⁸.</p> <p>The Washington State Environmental Policy Act requires cultural resource evaluation and assessment be carried out Under SEPA. The Washington State Department of Archeology and Historic Preservation is the sole state agency with technical expertise to offer formal opinions and technical opinions to State agencies and local governments.</p> <p>The Port Gamble S’Klallam Tribal Historic Preservation Office has archeological and historic preservation expertise, and cultural resource authority within the boundaries of the Port Gamble S’Klallam Reservation as well as the legal right to provide technical comment and review relating to cultural resources issues affecting Tribes.</p> <p>Coordination with the Port Gamble S’Klallam Tribe means working directly with formal Tribal representatives for cultural resource issues. It does not mean sending a letter to the Tribe informing them of a proposed action or finding. Under Section 106 only Tribes can determine the importance of a cultural resource site to the Tribe. The Tribe determines if they need to participate in a cultural resource consultation and evaluation in relation to a proposed undertaking. The Tribal Historic Preservation Office comments on cultural resource evaluations and provides formal opinions that may concur or disagree with archeological analysis. The Port Gamble S’Klallam Tribe may provide more comprehensive review and analysis then a private contract archeologist. If private archeologists are only providing comment on archeological resources and fail to consider Traditional Cultural Properties and Native American Cultural Landscapes or Scared Sites, they are not meeting their obligations to fully address cultural resources pursuant to all applicable State and Federal cultural resource protection laws.</p> <p>The types of cultural resources that need to be attended to in any cultural resource evaluation associated with proposed re-development of Port Gamble include wetlands, intertidal zones, near shore and marine settings. Theses cultural resources settings include traditional harvest sites, and include natural features of cultural significance to tribal members, even if the site does not appear to outwardly bear cultural or historic value to non-community members.</p> <p>The proposed redevelopment of Port Gamble needs to consider how actions may impact these types of cultural resource sites according to State and Federal laws. The eligibility of many of these sites are hinged upon the relations that people maintain with them through their treaty protected harvest practices. Minimizing consultation with the Tribe, and evaluation of the wide range of cultural resource types can result in the irreversible destruction to tribal cultural resources and has the potential to cause cultural damages to the Port Gamble S’Klallam community. It is in the best interest of all county residents that the Port Gamble Redevelopment Environmental Impact Statement provide as thorough and comprehensive an analysis of potential impacts to cultural resources as early in the scoping phase of the proposed work as possible in order to avoid unnecessary and avoidable impacts to cultural resources.</p> <p>IV. Coordination with MTCA Cleanup and Restoration Actions Needed</p> <p>Cleanup and restoration of the Port Gamble mill site and Bay, considered a priority toxic cleanup site under</p>	

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			<p>the Puget Sound Initiative, is currently underway within the requirements of the Washington State Model Toxics Control Act (MTCA). The Washington State Dept. of Ecology (Ecology) and the Potential Liable Persons (PLPs; Pope Resources LP and Olympic Property Group LLC) entered into an Agreed Order for the Port Gamble mill site cleanup in May 2008. The Agreed Order requires the PLPs to develop a Remedial Investigation and Feasibility Study (RI/FS) work plan to evaluate the nature and extent of site contamination, an RI/FS Report, and a draft Cleanup Action Plan (CAP). Ecology and the PLPs are currently in negotiations regarding the CAP and restoration plan. Release of the draft CAP is anticipated within the next few weeks. Since the MTCA cleanup will include actions at the mill site and within the Bay, including dredging, piling removal, capping and other activities, the County should coordinate its EIS process and permitting with Ecology's cleanup and restoration plans. Coordinating with the MTCA actions could prevent a potential future liability due to possible interactions with contaminated soils and sediments, or interference with required MTCA actions at the proposed project site. The EIS should address the need to postpone any potential permitting and developments until after the completion of actions identified in the consent decree. Coordination with Ecology's cleanup and restoration will also ensure that the EIS includes an appropriate analysis of baseline conditions. As discussed in the Environmental Health section below, issues concerning upland dioxin/furan contamination, the pending upland cleanup, and the "upland disposal facility" associated with the current cleanup, will have direct effects on the redevelopment. It is essential that Kitsap County coordinate the EIS analysis with current and future MTCA cleanup/restoration actions. If upland contaminants are not addressed, development or construction activities could force more contaminated material into Port Gamble Bay via stormwater runoff, erosion or wind.</p> <p>The County should also coordinate with Ecology regarding the previous interim remedial actions that were performed in areas adjacent to the mill site in 2003 and 2007, including the chemistry data from the soils and post cleanup monitoring wells. Although these interim cleanup actions were considered complete, the remaining soil chemistry may not be adequately clean for planned uses under the proposed mill site developments. Close coordination with Ecology regarding post cleanup monitoring and soil sampling at these sites will help to ensure that exposures or recontamination does not occur.</p> <p>V. Addressing Potentially Significant Adverse Effects to Elements under SEPA</p> <p>EARTH</p> <p>Adverse Effects of Fill on Mill Site</p> <p>The entire Port Gamble Mill site was historically filled to unknown depths, perhaps as deep as 20 feet. The nature of the material that was placed is unknown. Some of the fill was soil from previous contaminated mill soils; however this material was not characterized sufficiently for review. It appears that the intent is to place an additional five feet of fill on top of the existing fill to physically support the future development. If the previously placed fill contained organic or expansive materials, it may not be suitable for structural fill and could lead to failure of foundations and infrastructure. Therefore, the EIS should include a full geotechnical analysis of the existing material to determine its suitability for the future development. If not suitable, the grading quantities could increase substantially to remove and replace unsuitable material. Geotechnical review should include analysis of the existing and proposed future fill material.</p> <p>A significant amount of new fill is being proposed, spreading 5 feet deep over the entire site. If compacted as structural fill as appears to be the intent, this fill will be essentially impervious. Storm drainage runoff could become problematic if extreme care is not taken in the selection and placement of this fill, especially given</p>	

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			<p>the developer's claim that storm drainage facilities will be unnecessary because the surface will be pervious with little or no runoff. The EIS should provide a geotechnical evaluation of all site grading and fill, including materials, compaction, inspection and interim surface flow patterns.</p> <p>Adverse Effects from Increased Impervious Surface</p> <p>With the construction of the proposed residential, commercial and recreational buildings on fill, as well as paved parking lots, roads, sidewalks and trails, a significant portion of the shoreline surface would become paved impervious surface and ecological functions would be permanently removed from the watershed. The impervious surface will also eliminate any future opportunities to improve hydrologic functions through restoration, such as planting vegetation and improving soil infiltration. The EIS should identify the percentage of the site that will be covered by impervious surface after project construction and evaluate the impacts to the hydrologic cycle and water quality in Port Gamble Bay.</p> <p>As the natural landscape is paved over, a chain of events is initiated that begins with alterations in the hydrologic cycle and typically ends in degraded water resources (Arnold and Gibbons). As impervious coverage increases, the velocity and volume of surface runoff increase and there is a corresponding decrease in infiltration. Hydrologic disruption gives rise to physical and ecological impacts, such as increased erosion, loss of riparian habitat from increased water volumes, and a more direct transport of pollutants into waterways, creating nonpoint source pollution that can lead to the closure of hellfish beds.²⁹ Therefore, an increase in impervious surface of the size proposed for the Port Gamble shoreline would likely have a significant adverse effect on the hydrologic cycle, surface runoff and water quality in the bay. The proposed projects would permanently remove hydrologic functions from the watershed.</p> <p>According to the Kitsap County Initial Basin Assessment³⁰, a recharge aquifer exists in the Port Gamble area. The Shoreline Substantial Development Permit (SSDP) for the existing development identified shallow ground water on the site, at a depth of less than one foot. As this groundwater will ultimately flow into the bay, maintenance of the quality of the ground is critical. The Hearing Examiner in the SSDP required a four-foot separation between ground water and any new pervious surface. The future depth of the groundwater after development is a very complex geotechnical consideration.</p> <p>Increasing impervious surface at Port Gamble will likely have an impact on the aquifer.</p> <p>According to a Kitsap Water District Issue Paper, an increase in impervious surfaces</p> <p>²⁹ Arnold, C.L., and Gibbons, C.J., Impervious Surface Coverage, The Emergence of a Key Environmental Indicator, Journal of the American Planning Assoc., Vol. 62, No. 2. 1996. ³⁰ Digitized Port Gamble Aquifer, Kitsap County Initial Basin Assessment, Oct. 1997.</p> <p>upsets the natural water balance within a drainage basin because it decreases natural recharge of the aquifer and increases run-off. Reductions in soil permeability from development have many causes including compacting soil with vehicles, covering original soil with blacktop, or erecting buildings. Increases in impervious surfaces and decreases in natural recharge may lower the safe sustainable yield of an aquifer, creating an over-drafting condition that will deplete the aquifer. ³¹ The increased impervious surface at Port Gamble will likely have a significant adverse effect on ecological functions of the Port Gamble aquifer. The EIS should include a comprehensive assessment of the effects of the proposed impervious surfaces on the hydrologic cycle and water quality as compared to habitat restoration at the site. A full geotechnical analysis must be performed to determine the height to which the ground water will rise when new fill is placed and specifications for the protection of groundwater should be provided.</p>	

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			<p>Adverse Effects to Shoreline Processes</p> <p>The grading permit narrative describes the proposed grading activity to fill the mill site area approximately 5 feet above the existing grade. The permits states, "Once the site fill is completed, the site will be stabilized by applying grass seed. After the site is stabilized, it will consist entirely of nonpollution generating pervious surfaces and will therefore not require any permanent water quality treatment facilities." We are highly concerned about this statement since it is unlikely that the application of grass seed will be sufficient to prevent the loss of fill material into the Bay. If a temporary silt fence does not effectively contain unstable fill materials at the site additional shoreline armoring will potentially be required to prevent erosion and unsafe conditions.</p> <p>By design, armoring structures and silt fencing would block natural, more gradual upland erosion processes that deliver sediments and replenish shoreline materials carried away by waves and tides. The restoration activities such as vegetation buffers and beach habitat planned for the site would eventually restore ecological processes along the shoreline.</p> <p>However, in place of such processes, the abrupt physical barrier would serve to intensify waterward erosion of waves, further altering beach structure. Changes in sediment transport due to armoring have also contributed to loss or fragmentation of coastal structures.</p> <p>31 Kitsap Water District, Development Impact, Volume 4 Appendix 2, Issue Papers, May 20, 1997.</p> <p>Coastal sediment transport processes that create and maintain structure for barrier beaches form the boundaries for coastal embayments; disruption of such transport due to armoring in turns leads to the degradation of embayments (Schlenger et al., in review). Losses of embayments have been noted to have significant impact on juvenile Pacific salmon that use these habitats for feeding (Beamer et al. 2003; Fresh 2006). Other significant impacts include altered nutrient inputs and overall water quality, loss of or diminished primary productivity, and loss of biodiversity (Schlenger et al., in review).³² In addition, the steep bluffs to the south and west of the waterfront development area appear to have historically served as feeder bluffs, providing fine sediments and sand to the marine environment. The filling and construction of armoring along the shore have caused the bluffs to no longer function in this manner. A full analysis of shoreline armoring, fill stability and erosion control, as well as the function of feeder bluffs and other coastal processes should be addressed in the EIS.</p> <p>WATER</p> <p>Adverse Effects on Aquatic Habitat and Species</p> <p>Although OPG does not currently have an active dock application with Kitsap County, we understand that the County plans to reactivate the previous OPG dock application contingent on execution of a MTCA consent decree. OPG staff have announced plans for a dock as part of the Port Gamble redevelopment during the March 18, 2013 public scoping meeting at Poulsbo City Hall and at previous public meetings. Therefore, since the dock proposal would be directly connected with the redevelopment plan, analysis of impacts from the proposed dock should be integrated in the EIS. While the dock application will undergo a separate SEPA analysis, the current EIS should address all actions being considered for Port Gamble redevelopment, including the dock.</p> <p>Redevelopment at Port Gamble will potentially lead to a demand for aquatic vessel traffic and subsequently for docks and moorage. Increased aquatic vessel traffic and increased demand for docks and moorage will</p>	

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			<p>likely have significant adverse effects on aquatic species and habitats. These impacts should be included in the EIS analysis.</p> <p>The increase in vessel activity from the proposed redevelopment would pose a significant</p> <p>32 Puget Sound Science Update website: http://pugetsoundscienceupdate.com/pmwiki.php?n=Chapter3.Section4 http://pugetsoundscienceupdate.com/pmwiki.php?n=Chapter3.Section4</p> <p>threat to the health of the Bay, including the potential for scouring seafloor sediment and vegetation, and an increased risk of spills and contamination from vessels. The increased vessel traffic will directly impact water quality and aquatic habitats, as well as ecological functions in nearshore areas (see below under Adverse Effects from Increased Aquatic Vessel Traffic). NOAA Fisheries reports,</p> <p>“An increase in the number and size of vessels can generate more wave and surge effects on shorelines. These vessel-wake, wash events can affect shorelines depending on the wake wave energy, the water depth, and the type of shoreline. Vessel wakes can cause a significant increase in shoreline erosion, impact wetland habitat, and increase water turbidity. Vessel prop wash can also damage aquatic vegetation and disturb sediments, which may increase turbidity and suspend contaminants (Klein 1997, Warrington 1999).”³³</p> <p>We are concerned that the combined effects of increased aquatic vessel traffic and proposed docks and moorage will significantly impact various ESA and non-ESA listed aquatic species. Port Gamble Bay supports herring spawning, as well as surf smelt and sand lance spawning in the nearshore areas. Freshwater streams connecting to the Bay support Chinook salmon, Steelhead and other finfish species. In addition, tribal members harvest many species of shellfish in Port Gamble Bay, including horse, littleneck, butter and manila clams, oysters, and geoduck. Eelgrass and other aquatic vegetation is abundant throughout the Bay. Installation of overwater structures, such as the proposed dock, would have a significant impact on these species and habitats.</p> <p>According to the Puget Sound Nearshore Partnership, shellfish are affected by the character and quality of nearshore waters both as larvae and adults. Particularly shellfish larvae and juveniles are sensitive to physical conditions and to pollutants, and require water that is relatively free of contaminants, of an appropriate temperature range, and with generally near-marine salinities. They require the natural currents that can transport them to nearshore areas appropriate for their settlement. Human use of the nearshore, such as the proposed dock, resulting in destruction of habitat, especially soft sediment, is a major problem for shellfish species in the Puget Sound. ³⁴ The EIS should incorporate analysis of direct and indirect impacts to aquatic habitat displaced by piles, overwater ³³</p> <p>National Marine Fisheries Service (NOAA Fisheries), Non-fishing Impacts to Essential Fish Habitat and Recommended Conservation Measures, August 2003, p. 25.</p> <p>³⁴ Dethier, M. et al., Native Shellfish in Nearshore Ecosystems of Puget Sound, Puget Sound Nearshore Partnership, Technical Report 2006-04.</p> <p>area shading, and partial shading to geoduck and other shellfish species in the intertidal and subtidal areas, both during construction and over the operational lifespan of the proposed dock.</p> <p>The EIS should also consider the impacts of shoreline structures and vessel traffic on the movement of salmonids and forage fish to bypass the dock structure. Studies show that overwater structures may result in conditions that can deflect or delay migration, and alter predator-prey relationships³⁵. The NOAA Fisheries reports:</p> <p>“The shadow cast by an overwater structure may increase predation on EFH managed species by creating a</p>	

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			<p>light/dark interface that allows ambush predators to remain in a darkened area (barely visible to prey) and watch for prey to swim by against a bright background (high visibility) (Helfman 1981). Prey species moving around the structure are unable to see predators in the dark area under the structure and are more susceptible to predation.”</p> <p>36 The EIS should assess the potential impacts of altered migration and predator-prey relationships to tribal fishing activities in the Bay. These and other tribal fishing practices may be directly impacted by the changes associated with the effects of the dock structure and vessels on fish abundance and distribution. In addition, the proposed dock and increased vessel activity would have indirect effects that should be addressed in the EIS, including fragmentation of aquatic vegetation and increased noise.</p> <p>In summary the EIS should evaluate the potential impacts of the proposed dock in connection with the Port Gamble redevelopment. The EIS should assess significant adverse effect on aquatic resources and habitats, tribal fisheries, and the increased risk for closure of shellfish beds due to potential impacts to water quality.</p> <p>Adverse Effects to Floodplain Processes</p> <p>The Kitsap County FEMA Flood Hazard Zones and Floodways map³⁷ indicates that the Port Gamble shoreline is located within a 100-year floodplain, as determined by detailed methods. This determination was based on elevation and floodplain data from the</p> <p>35 Nightingale and Simenstad, <i>Overwater Structures: Marine Issues</i>, University of Washington, 2001.</p> <p>36 National Marine Fisheries Service (NOAA Fisheries), <i>Non-fishing Impacts to Essential Fish Habitat and Recommended Conservation Measures</i>, August 2003, p. 31.</p> <p>37 Kitsap County, <i>FEMA Flood Hazard Zones and Floodways</i>, December 2007.</p> <p>Washington Department of Natural Resources and the Federal Emergency Management Association (FEMA). Therefore, the proposed development on the Port Gamble shoreline would have a significant impact on the environment and ecological functions in this environmentally sensitive area. The proposed placement of fill at Port Gamble to raise buildings above the flood hazard zone will obstruct floodplain processes and permanently remove important floodplain ecological functions from the watershed. According to the National Wildlife Federation, valuable habitat for salmon, orca, turtles, waterfowl, and other species is imperiled and Puget Sound Chinook salmon have declined 30% due to floodplain development. Developing in floodplains reduces the ability of the land to slow and store floodwaters. This means that floods are more frequent and severe, riparian plants that naturally filter pollutants are damaged, and more pollutants enter waters and degrade stream health. Climate change is projected to bring more rain, increasingly severe storms, and even more floods. Unless floodplain management is improved, our current flooding problems are likely to get worse.³⁸ The National Oceanic and Atmospheric Administration (NOAA) estimates that almost three quarters of wetlands have been lost in Puget Sound, the vast majority of which occurred in floodplains. Floodplains have been lost through a combination of shoreline armoring, levees, and residential, commercial, industrial and agricultural development. The Puget Sound Partnership has set a target for restoring 15% of historic floodplains in Puget Sound and attaining “no net loss” of floodplain functions by 2020.³⁹ Kitsap County has chosen “Door 3” floodplain regulations, which call for project-by-project review of proposed floodplain development. The National Flood Insurance Policy Biological Opinion requires the following for “Door 3” local floodplain regulations:</p>	

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			<p>“All projects within the floodplain demonstrate that there will be no adverse effects to functions (direct, indirect, and cumulative). Functions that may be affected include but are not limited to storm water, riparian vegetation, bank stability, channel migration, hyporheic zones, wetlands, and large woody debris. Absent a programmatic approach through Door 1 or Door 2, communities must ensure that development in the Special Flood Hazard Area (SFHA) will not cause harm to threatened or endangered species, or that any harm from floodplain development is exempt from the take prohibition contained in Section 9 of the ESA. Any project that 38 National Wildlife Federation, Protecting Puget Sound Floodplains, Seattle, WA.</p> <p>39 Puget Sound Partnership Website: http://www.psp.wa.gov/vitalsigns/flood_plains.php</p> <p>may have an adverse impact on threatened and endangered species must receive an incidental take permit under Section 10 of the ESA. Applicants for development projects in the SFHA must assess the impact of the proposed development on salmon habitat on a permit by permit basis (“Door 3”).”⁴⁰</p> <p>Therefore, the County should comply with the above NFIP Biological Opinion requirements for floodplains. The EIS should include a comprehensive analysis of proposed Port Gamble development impacts on ecological functions, salmon, birds and other species. A full analysis of the impacts of placing fill on the site should be included in the EIS. The analysis should include impacts to marine life and habitats, impacts of any structures or bulkheads needed to support the fill and the future impact of sea level rise on the safety of the proposed development. As the county, state and federal governments will all have some level of responsibility for insuring the safety of the future occupants and property on the site, a full flood risk analysis should be included.</p> <p>Adverse Effects on Adjacent U.S. Waters and Wetland Complex In addition to the above EIS analysis, the project would also be required to undergo Clean Water Act Section 404 permitting requirements under the Environmental Protection Agency (EPA) and U.S. Corps of Engineers (USACE). According to Federal Guidance on Identifying Waters Protected by the Clean Water Act,⁴¹ EPA and USACE “will assert jurisdiction over waters with a significant nexus to traditional navigable waters or interstate waters in accordance with SWANCC and Rapanos.” The guidance defines a significant nexus as, “waters to be “similarly situated” with waters of the same resource type, specifically (a) tributaries; (b) adjacent wetlands; or (c) other waters that are in close physical proximity to traditional navigable waters, interstate waters, or their jurisdictional tributaries (“physically proximate other waters”).”</p> <p>According to Triad Sheets SS1 – SS4 in the Port Gamble Redevelopment application, proposed Tracts 900 through 919, Tracts 942 through 944, and 945, Tracts 932, 937 and 938, Lot 142, and others, are located adjacent to the Machias Creek and wetland complex that connects directly to Port Gamble Bay. On several of these tracts the proposed structures are located within the wetland buffer zones. Any buildings or impervious surfaces within the wetland buffers or adjacent to the wetland complex would have a</p> <p>40 FEMA Fact Sheet: What does it mean to be in “Door 3?” January 11, 2012.</p> <p>41 Executive Order 12866, Guidance on Identifying Waters Protected by the Clean Water Act, 2012. E.O. 12866_OW CWP RIN 2040-ZA11 Final Guidance_20120217.</p> <p>direct adverse effect on the watershed system, and ultimately Port Gamble Bay.</p> <p>Therefore, a Section 404 permit is necessary and required for ensuring that U.S. waters, including the creek, wetlands, and bay, are adequately protected.</p> <p>Adverse Effects of Increased Runoff</p> <p>The Port Gamble Redevelopment Plan Biological Assessment states, “All stormwater runoff will be directed to</p>	

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			<p>rain gardens located on the mill site. The rain gardens will provide the required treatment, which will then be collected in an under-drain stormwater conveyance system. The storm conveyance system will then direct the treated stormwater to an existing outfall on the site, which will discharge into Hood Canal.” Although we support the use of rain gardens for capturing stormwater runoff when appropriate, it is critical that the County conduct an analysis of the proposed rain garden system to ensure the appropriate management of increased levels of runoff and to protect water quality in Port Gamble Bay.</p> <p>Low Impact Development (LID) is a relatively new, but well-researched and documented way of treating storm water from development. While LID is a proven technology in urban settings, when used in conjunction with storm water quantity control, it is not well documented that LID elements will meet rural receiving body water quality standards, particularly without quantity control. Direct discharge of urban runoff through bioswales to a highly sensitive water body is a risky proposition, as urban pollutants such as oils from motor vehicles or household chemicals could receive inadequate treatment.</p> <p>Therefore, the EIS should fully evaluate the efficacy of LID in treating the runoff from the Port Gamble site. Such analysis should consider the lack of quantity control and risks associated with direct discharge to Hood Canal and the Bay.</p> <p>The development plans include an agricultural district with livestock, which poses a potential hazard to increasing paralytic shellfish poisoning (PSP) outbreaks. Without appropriate vegetation buffers, fencing, and other protections, runoff from the farm would potentially increase the risk of fecal coliform contamination in nearby streams, wetlands, and aquifers, adversely affecting water quality in freshwater systems and Port Gamble Bay. Manure has the components of nitrogen and phosphorus, both of which promote algal growth for PSP outbreaks.</p> <p>Port Gamble S’Klallam Natural Resources has identified a correlation between an increased PSP outbreak and a previous dredging activity. Livestock presence and dredging combined has the potential to significantly increase PSP outbreaks in Hood Canal and Port Gamble Bay. In addition, livestock waste is a pathway for spreading a variety of bacterial and viral infections. The EIS should address how the operation will not significantly increase PSP outbreaks or exposure to pathogens related to livestock waste. The EIS should assess whether project plans provide adequate protection of water quality associated with farm livestock and should include an analysis of risk for contamination from agricultural runoff.</p> <p>Adverse Effects on Water Supply and Discharge</p> <p>Development of a new community at Port Gamble will require additional public infrastructure, including water (addressed above), sanitary sewer, electrical power and natural gas. Given the remote location of Port Gamble, these will require significant upgrades to the existing sources and distribution systems. The current expansion of the Kitsap County Public Utility District (KPUD) storage facilities on the south end of the Port Gamble ridge is specifically designed to meet the fireflow and urban growth needs of Poulsbo. Sanitary sewer is of particular concern, as the existing system serving the town of Port Gamble is totally inadequate to serve even existing needs and has resulted in the closure of a prime geoduck bed, a clear impact to tribal treaty rights. It appears that a Large On-site Sanitary Sewer (LOSS) is being proposed. LOSS systems are essentially large drain fields that do not employ the latest technology for sewage treatment and discharge effluent to the ground. The specific location of the LOSS system will be significant, as large portions of the Port Gamble ridge are part of a highly permeable sandy aquifer with high susceptibility to contamination. Impacts to down</p>	

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			<p>gradient wells and water supplies could occur. It also appears that a single sewage treatment system is being proposed for both the area inside the LAMIRD and in the adjacent rural area. This appears to be a violation of the GMA prohibition against extension of sanitary sewers into the rural area.</p> <p>The EIS should include a full analysis of the adequacy of the public systems to serve the full development at Port Gamble. The analysis should include a cost estimate for maintaining the systems in the future, the ability of the development to pay the cost of the required expansions and the public cost of maintenance. With respect to the sanitary sewer, the EIS should include a full analysis of the LOSS system being proposed, with particular attention on threats to ground water and water quality. In addition, other, more advanced treatment, such as Microbial Bio-Reactors should be evaluated. It should also fully examine the GMA provisions against extension of sanitary sewers in the rural area and the potential for the proposed system to encourage future rural development and sprawl.</p> <p>AIR</p> <p>Adverse Effects of Dust on Air Quality</p> <p>Trucks and barges will be removing soil and sediment from the mill site as part of the MTCA cleanup and restoration, as well as part of the construction phase of the proposed redevelopment project. These activities could disturb large amounts of dust, which could be distributed throughout Port Gamble, as well potentially across the bay to the Reservation, due to wind and dry conditions. Soil and dust disturbance is an issue of concern since the mill site sediments being removed as part of the cleanup have toxic contaminants that exceed levels determined to be hazardous to human health and wildlife by Ecology. Thus, the EIS should include an analysis of impacts on air quality and address dust mitigation technology that will be used during the construction phases and any redevelopment construction should take place after cleanup and restoration actions are completed.</p> <p>Adverse Effects on Air Quality from Transportation</p> <p>The scale and magnitude of this development project indicates that there is potential for a large increase in truck, car, ship, and boat exhaust, associated with both construction activities and redevelopment operation. Exhaust contains polyaromatic hydrocarbons and particulate matter, both of which have a negative impact on human health. Therefore, the EIS should clarify the expected increase in traffic and its potential impacts on local air quality.</p> <p>PLANTS AND ANIMALS</p> <p>Adverse Effects on Plants and Animals</p> <p>The Port Gamble upland area represents habitat with high ecological significance. The upland habitat includes freshwater riparian habitat, mature trees and micro-habitats (snags) that currently provide habitat for a variety of terrestrial avian species. According to the WDFW Priority Species and Habitats Program, the upland areas around the mill site include bald eagle nesting habitat and Mountain quail habitat (See Map: Kitsap County Shoreline Master Program Priority Habitats and Species and Map: Kitsap County Shoreline Master Program Bald Eagle Management Zones). In addition, the Kitsap Audubon Society has identified marbled murrelet species in breeding plumage in Port Gamble Bay, indicating the potential for nesting habitat in upland mature forests nearby.⁴²</p> <p>Restoration and conservation opportunities proposed for the Port Gamble area will provide increased habitat</p>	

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			<p>for species such as the marbled murrelet, bald eagle and the spotted owl, that depend on mature forests not generally available in the Hood Canal watershed for nesting, breeding and feeding. Alteration of the landscape from development would result in habitat loss and fragmentation, which impacts birds and mammals such as bear, cougar, deer, and other species. Isolation of suitable habitats from such land alternation will increase risks associated with dispersal, reproduction and foraging for many organisms. The proposed restoration and conservation plans for the Port Gamble area will ensure that one of last remaining undeveloped areas in North Kitsap will link marine and freshwater habitats and upland forests together for the protection of species that are dependent on the entire watershed ecosystem.</p> <p>Conservation and restoration projects offer an opportunity to protect a network of wildlife and habitat corridors and preserve ecosystem processes at a landscape scale (Map: Kitsap County Shoreline Master Program Landcover).</p> <p>It is important for the EIS to consider the restoration and conservation plans now underway for the Port Gamble Mill site and the upland areas surrounding Port Gamble. Funding for these activities has been secured and project planning will soon be underway, previous to permitting the proposed redevelopment activities. Therefore, the EIS analysis should assess the impacts of the proposed redevelopment on restored upland and aquatic habitats, including vegetation and eelgrass plantings, shoreline restoration, conservation easements, and other activities. Although the site today remains degraded from previous industrial activities, the EIS should evaluate upcoming restoration and conservation plans as a baseline for assessment of redevelopment impacts.</p> <p>TRANSPORTATION</p> <p>Adverse Effects of Increase in Land Traffic</p> <p>The proposed development will significantly increase traffic in the future. This is very problematic given the existing traffic problems in the area. Highway 104 passes through the town and during peak hours, the highway can become highly congested and hazardous. The operation of the Hood Canal Bridge can further exacerbate the problem, 42 Linger, F., Willott, J., Port Gamble Bay Bird Survey, Kitsap Audubon Society, Kingfisher, Dec. 2012/Jan. 2013 Issue.</p> <p>causing back-ups into and through the town. A “Future Bypass” is shown on the plans to apparently help address some of the problems. However, no immediate remedies to a transportation system already functioning above full capacity. Access by emergency vehicles to the new residences and businesses during periods of congestion could be severely impaired. The impact of the new development on the transportation network must be fully analyzed in light of the existing congestion and the operation of the Hood Canal Bridge. The need for and timing of the construction of the “Future Bypass” must be fully analyzed.</p> <p>Adverse Effects of Increased Aquatic Vessel Traffic</p> <p>The Port Gamble Traffic Analysis (January 2013) does not include an assessment of increased aquatic vessel traffic from the proposed project. Construction activities on the shoreline may involve barges, tug boats, and other aquatic vessels and equipment that would potentially impact aquatic habitat and water quality in Port Gamble Bay. Also, proposed redevelopment on the Port Gamble shoreline would likely increase demand for docks and moorage, as well as vessel traffic in Port Gamble Bay and throughout Hood Canal. Overwater structures and increased vessel activities significantly impact water quality and aquatic habitats such as eelgrass and marine sediment. Loss of aquatic habitat and a reduction in water quality would impact multiple</p>	

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			<p>species, including geoduck and other shellfish, herring and other forage fish, salmonids and other finfish, as well as aquatic vegetation and shore birds. The Tribe depends on the Bay for subsistence and commercial harvest of shellfish and finfish, and the effects of increased vessel activities and overwater structures would have directly impact tribal fisheries by increasing the risk of shellfish bed closures and contamination of Port Gamble Bay. In addition, activities in the nearshore may cause changes in habitat functions and impairment of ecological process, such as changes in drift cell sediment processes. Marine shoreline development may disrupt the supply, movement and deposition of sediment, potentially affecting the characteristics of a drift cell.</p> <p>Overwater structures, such as docks and moorage, can have direct physical effects on aquatic habitat from construction, as well as indirect effects associated with long-term changes in sediments, shading, and water quality from the ongoing operation of the structures and boat traffic. Direct effects can be a range of changes in the physical structure of the habitat, ambient light conditions, and water flow patterns and sediment movements. Also, the human use of overwater structures, via such things as boating activities, indirectly alters the environment by changing its physical and chemical composition (e.g., water quality degradation, propeller scour, and noise). Together, the direct and indirect effects of overwater structures can be so great as to alter the physical environment, resulting in harm to salmon and steelhead.”⁴³</p> <p>Studies such as “A Study of Stranding of Juvenile Salmon by Ship Wakes Along the Lower Columbia River Using a Before-and-After Design: Before-Phase Results⁴⁴” show significant impacts from vessel wakes in confined marine areas. The shallow Port Gamble Bay makes this a likely impact of significance, especially to juvenile salmon and forage fish. Project vessel traffic, wakes and vessel noise from project construction activities and a projected increase in vessel activity associated with the proposed Port Gamble development, should be analyzed in the EIS. In order to more effectively determine the full extent of the impacts from construction and redevelopment, the EIS should identify the number of construction barges and other vessels on site at any one time and the specific locations where these vessels will be parked during construction. In addition the EIS should include a comprehensive analysis of the projected increase in vessel activity associated with proposed development at Port Gamble, as well as direct impacts to tribal fisheries. Much more detail on vessel activity and related impacts is needed before direct impacts can be adequately assessed.</p> <p>ENVIRONMENTAL HEALTH</p> <p>Adverse Effects from Dioxin/Furan Contamination on Human Health Soil samples taken in the mill site upland areas indicate the presence of hazardous levels of dioxins/furans. The proposed redevelopment plan overlies areas that have been identified to exceed Ecology standards for human health. The remedial investigation and the draft CAP identify these upland dioxin/furan contaminants for a future MTCA cleanup action and identify the Port Gamble baywide cleanup as an “interim action” pending the completion of cleanup actions in the upland areas. Additional samples across the entire upland mill site are needed as part of the upland cleanup to determine the full extent of the contamination. The presence of dioxin/furan contaminants in upland soils located within the same area of the proposed Port Gamble redevelopment will pose a significant risk to human health, until the contaminated soils are remediated. Therefore, the EIS should address the significant impacts of the upland contamination on humans and wildlife and should consider any alternatives that would eliminate these potential</p> <p>⁴³ Nearshore Habitat – How Bank Armoring and Overwater Structures Shape the Health of Pacific Salmon and Steelhead, NOAA Fisheries Service Report, Spring 2012.</p> <p>⁴⁴ Pearson et. al, A Study of Stranding of Juvenile Salmon by Ship Wakes Along the Lower Columbia River</p>	

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			<p>Using a Before-and-After Design: Before-Phase Results, 2006. risks to human health or require the completion of the upland cleanup before construction and permitting begins.</p> <p>Adverse Effects of “Upland Disposal Facility” on Human Health Ecology’s draft Cleanup Action Plan (CAP) mentions an upland disposal facility that is planned for the containment of contaminated sediments dredged from the bay. However its location, size and design is not yet stipulated. Since the proposed redevelopment at Port Gamble includes a planned agricultural district as well as residential housing, the effects of the disposal facility could pose hazardous conditions to human health if not evaluated and planned appropriately. Therefore, the EIS should include an analysis of potential risks to human health and wildlife from the proposed redevelopment near the planned disposal facility, as well as the potential for runoff, trespassing, and wind conditions associated with the facility and the redevelopment plans.</p> <p>Adverse Effects of Noise on Human Health The proposed project construction and redevelopment operations would likely increase noise levels for nearby residents and wildlife, especially during off-hours and nighttime. Noise would potentially disturb residents in Port Gamble, Gamblewood, the Port Gamble S’Klallam Tribe Reservation, and other nearby neighborhoods, as well as tribal fishing activities. The EIS should include an analysis of noise levels for compliance with Environmental Protection Agency requirements. Nearby residents, fishers and harvesters should be informed of any noise levels exceeding those considered hazardous and those anticipated during nighttime construction. The EIS should also address mitigation measures that would be used to negate noise impacts.</p> <p>Other Adverse Effect from the Proposed Project The following elements are potentially significant impacts for including in the EIS analysis. To the extent that any of these impacts are not considered “environmental,” the EIS may still address them under WAC 197-11-440(8).</p> <ul style="list-style-type: none"> • Aesthetic impacts and Rural Character: Currently, the view of Port Gamble from the Port Gamble Reservation is largely undeveloped and natural. Even the view of the former millsite is relatively undisturbed due to the minimal current human use of that area. This rural, undeveloped character is important to maintaining the Tribe’s culture, which hinges on its connection to its past and its integral relationship with the environment. The proposed development’s numerous new structures, light, noise, and human activity will substantially disrupt the aesthetic and rural character of the area. Impacts on the Tribe and on other area residents and users should be addressed and mitigated. • Spinoff Development: Redevelopment, especially the proposed high intensity commercial and recreational development, will result in increased development pressure outside the narrow confines of the LAMIRD that would be inconsistent with precepts of the Growth Management Act and Comprehensive Plan. These effects should be analyzed in the EIS. • Demographic and Social Impacts: In addition to the impact of added numbers of people, the EIS should consider the economic and other characteristics of the likely population and visitors and how that will affect current patterns of resource use, aesthetics, commuting and travel patterns, and the social and educational environment for local residents, including tribal members. • Educational Impacts: Consider effects on the increased need for school construction and maintenance 	

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			<p>associated with the proposed redevelopment.</p> <ul style="list-style-type: none"> • Fire, Police, and Emergency Services: Consider effects on the increased need for fire, police and emergency services associated with the proposed redevelopment. • Earthquake and Soil liquefaction Risk at the Millsite: Consider the risks of earthquake and soil liquefaction at the mill site related to the proposed actions. <p>VI. Cumulative Environmental Effects</p> <p>Throughout Hood Canal, an increasing number of development projects are occurring over time. The Navy’s EHW-2 construction is currently underway, and other Navy projects such as the Land Water Interface, Service Pier Extension, Swimmers Net Test, Electromagnetic Measurement Range System, Barge Mooring Project, and other projects are planned. In addition, large industrial activities such as the Olympic View Marina, Thorndyke Resources Conveyor and Pier, and Pleasant Harbor Marina and Golf Resort are planned for Hood Canal. The proposed Port Gamble redevelopment project and future proposed dock would contribute toward the cumulative effects of Hood Canal activities in aggregate.</p> <p>In aggregate all activities in the Hood Canal have a significant effect on natural resources and tribal treaty rights. Cumulative effects significantly impact ecosystem structures and functions at scales beyond proposed project boundaries. For example, vessel activity from the proposed project in combination with other vessel activity throughout the Hood Canal in aggregate will significantly impact aquatic resources and tribal fisheries. The proposed project, including construction, increased intensity of upland and shoreline uses and increased transportation and vessel traffic will significantly contribute toward cumulative effects in the Hood Canal watershed. The EIS should consider the cumulative effects of vessel traffic, waves, and wakes, the cumulative destruction of habitat, cumulative impacts on terrestrial and aquatic species, increased risks of spills and releases, cumulative impacts from increased impermeable surfaces, stormwater runoff, and shoreline armoring, and other impacts across the Hood Canal watershed over time.</p> <p>VII. Compliance with Zoning Codes and Comprehensive Planning</p> <p>To insure compliance with Kitsap County zoning codes and comprehensive planning, the EIS should include an evaluation of consistency with County regulations. Specific problems that should be addressed through this evaluation include compliance with town development objectives, Rural Historic Waterfront Town housing types, Rural Historic Town Residential Use requirements, native vegetation requirements, and open space requirements as described below.</p> <p>Town Development Objectives</p> <p>The entire Master Plan is subject to the Town Development Objectives (TDO) as specified in the Zoning Code and the Comprehensive Plan. To insure compliance with the TDO’s and to insure historical accuracy, a compliance review performed by an architectural and site review committee, which committee is to include a representative of the Port Gamble S’Klallam Tribe. As an alternative, the county may hire a consultant, through the county professional consultant procurement process, and require the developer to pay for the consultant’s services. The EIS should specify the means by which the integrity of the TDOs and the historic elements of the site design are to be maintained with meaningful, objective input from all designated parties throughout the review process.</p> <p>Rural Historic Town Waterfront (RHTW) Housing Types</p>	

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			<p>The intent of the LAMIRD Zoning for the RHTW is quite clear in the desire to limit residential development in this zone -- prohibiting all single family development types, including all single family attached and detached housing, except cottages and mixed use.</p> <p>Kitsap County Code is unclear as to the meaning of the cottage and mixed use terms. Typically, cottages refer to small units with detached parking and common open space with small private yards or outdoor area. Mixed Use typically means units in which commercial/retail uses are contained in a single building, typically with the businesses on the ground floor and residences on the upper floors. Kitsap County code requires only that the business and residential uses be integrated, without defining the term. In an urban context mixed use zones are sometimes specified to insure adequate affordable housing exists to house the workers for the businesses and, thereby, reduce commuting. In this case, it is hard to imagine that the service workers in the hotel and restaurant with which the waterfront townhomes are associated, would be employed by these businesses. Architecturally, the townhomes appear to feature garage dominated street fronts, a modern invention and clearly not a historical development type. The EIS should examine the intent and meaning, in light of the code, comprehensive plan and historical perspective, of the residential uses allowed and proposed. Site planning and architectural design elements must be fully disclosed and evaluated under the TDOs. Guidelines for cottage and mixed use development should be included in the EIS.</p> <p>Rural Historic Town Residential</p> <p>The TDOs require that the residential uses reflect historic development types and patterns. For most of the RHTR, this appears to be the case. The residential development features mostly large lots with alley access. However, several do not. KCC states, "Homes shall face the street, with access for garages and parking off alleys whenever possible. Detached garages are preferred, with alley access or shared driveway access from the street." Lots 500, 501, 503, 521 and 523 are noted to be future development lots, with no indication of the intended future use. The type of future development is unknown, as it is not stated in the plans. If the graphic representation shown on the utility plans for some of these lots is intended to be binding, it should be so stated (existing commercial on Lot 500, parking on Lot 501?). Without limitations placed on these future development lots, density, housing types, access, etc. cannot be evaluated. The intended future development proposed on the future development lots should be fully disclosed and evaluated in the EIS.</p> <p>RHTR and RR Zone Tracts</p> <p>Tracts 939 through 944 are denoted to be "Open Space" tracts in the permit application. Per the PBD standards, "All open space, other than those areas needed for utilities or other infrastructure, shall be retained in native vegetation unless the PBD specifically provides for an alternative use." No alternative use is specified, and therefore it must be presumed that these tracts will be retained in native vegetation. By code, the EIS must evaluate Tracts 939 through 944 as future native vegetation, with no development, in the absence of a specific alternative development proposal.</p> <p>Lack of Open Space</p> <p>Under the PBD code, "In rural zones, common open space shall be no less than fifty percent of the total site area." The zoning code states that, "Large community open spaces are preferred..." And, "New development shall be landscaped in such a manner as to reflect the historical character of the town and preserve and enhance publicly accessible open spaces and retain mature trees to the extent possible." ... "Creating,</p>	

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			<p>enhancing and preserving a town commons or a series of connected public open space linkages shall be required in conjunction with any master planned or other significant redevelopment of the town that reflects the same qualities of the historic town including visual assets and species of vegetation.”</p> <p>Thus, it is clear that the intent of both the LAMIRD and PBD codes is that the open space requirements be met within the development areas, not in a remote portion of the development. The logic of the two codes taken together, is that the 50% open space requirement be met within each zoning category to insure proximity to the development it is intended to serve. This proposal provides only an aggregate open space calculation, suggesting that open space in the RW zone is being offered to meet the requirement in higher density zones. This clearly contradicts the intent of the open space. Further, the historic development pattern featured extensive, interconnected common open space within the residential areas. The proposed development does not. The proposal for the RR zone provides no common open space.</p> <p>The EIS must evaluate the adequacy of the common open space with respect to all of the applicable codes, the Comprehensive Plan and historic development patterns, with an accounting of the open space within each of the five zoning designations (RHTW, RHTR, RHTC, RR, RW). The proposal appears to count substantial undeveloped land outside the actual redevelopment area as open space. This reduces the amount of open space within the development. The EIS should analyze the impacts of the proposal on open space, the consistency of the proposal with county open space requirements, and the cumulative impacts if this method of calculating open space is replicated countywide. The EIS should consider alternatives that incorporate more open space within the development itself.</p> <p>We appreciate your incorporation of these comments in the draft EIS. We look forward to working with the County throughout the EIS and permitting process. Please feel free to contact me with any questions.</p> <p>Sincerely, Roma Call Environmental Coordinator Port Gamble S’Klallam Tribe PORT GAMBLE S’KLALLAM TRIBE NATURAL RESOURCES DEPARTMENT 31912 Little Boston Rd. NE – Kingston, WA 98346 32 APPENDIX A Table 1. Summary of PGST Concerns and Actions for the EIS Issue of Concern Scope of EIS Impacts to Cultural Resources Evaluate cultural alternatives pursuant to Section 106 of the National Historic Preservation Act; Work directly with PGST representatives; Thorough and comprehensive analysis of potential impacts to cultural resources as early in the scoping phase as possible; Evaluate cultural resource impacts according to state and federal laws. MTCA Cleanup and Restoration Kitsap County should coordinate with Ecology’s cleanup and restoration plans. Fill at Mill Site Geotechnical analysis that includes the following:</p> <ul style="list-style-type: none"> • Analysis of existing fill material to determine suitability for development. • Analysis of site grading and new fill, including materials, compaction, inspection, and interim surface flow 	

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			<p>patterns</p> <ul style="list-style-type: none"> • Analysis of ground water levels when new fill is placed and specifications for groundwater protection <p>Increased Impervious Surface and Increased Potential for Runoff Analysis of impervious surface on hydrologic cycle and water quality as compared with restored site; Analysis of efficacy of LID techniques at this site; Analysis of risk for contamination from agricultural runoff. Impacts on Shoreline Processes</p> <p>Analysis of effectiveness of the proposed grass seeding and silt fencing for shoreline stability;</p> <p>Analysis of shoreline actions on coastal processes, erosion, effects on salmon, herring, shellfish, and other species as compared with effects of restoration actions; analysis of feeder bluff process. Pending Dock Proposal</p> <p>Analysis of impacts from dock proposal should be addressed, including increased aquatic vessel traffic and increased demand for docks and moorage associated with redevelopment proposal.</p> <p>Clean Water Act Section 404</p> <p>Requirements Needed Proposed development located in wetland buffers and adjacent to the Machias Creek and wetland complex requires a Section 404 permitting.</p> <p>Loss of 100-Year Floodplain Compliance with NFIP Biological Opinion requirements; Analysis of proposed project on ecological functions, salmon, birds, and other species.</p> <p>Increased Demand on Water Supply and Increased Discharge Description of water sources, waste treatment and discharge systems. Analysis of effects to surface and ground water and Port Gamble Bay; Comparative analysis of advanced wastewater treatment systems for this site; examine the GMA provisions against extension of sanitary sewers in the rural area.</p> <p>Impacts on Air Quality Analysis of dust associated with proposed projects and potential effects of increased transportation on air quality.</p> <p>Impacts on Plants and Animals Analysis of proposed project impacts on planned restoration and conservation actions currently underway; Analysis of effects on terrestrial and aquatic species.</p> <p>Increase in Land Transportation and Aquatic Vessel Traffic Analysis of effects from increased land transportation and aquatic vessel traffic due to both project construction and increased land and shoreline use from redevelopment, including impacts to tribal fisheries.</p> <p>Increased Risk to Human Health Analysis of effects from upland disposal facility on proposed redevelopment activities; Analysis of human health impacts from dioxin/furan contaminants in mill site upland soils; Analysis of noise effects on human health and wildlife.</p> <p>Cumulative Effects Cumulative effects analysis of activities across Hood Canal watershed on natural resources and treaty rights.</p> <p>Compliance with County Zoning and Comprehensive Plan Evaluation of compliance with town development objectives, Rural Historic Waterfront Town housing types, Rural Historic Town Residential Use requirements, native vegetation requirements, and open space requirements.</p> <p>APPENDIX B</p> <p>Table 2. Summary of PGST Suggested Mitigation Options for the EIS Issue of Concern Scope of EIS Cultural Resources Mitigation options to be determined in coordination with PGST representative.</p> <p>MTCA Cleanup and Restoration Delay development pending remediation and restoration; limits on excavation in contaminated areas; improved runoff and dust controls; use restrictions to limit exposures Fill at Mill Site</p> <p>Reduced or eliminated fill Increased Impervious Surface and Increased Potential for Runoff</p>	

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			<p>Move marine discharge points; quantity control and added treatment before marine discharge Impacts on Shoreline Processes Reduced millsite development; millsite preservation; jetty removal Docks, Marinas, and Moorage Prohibit or limit size and location of moorage; require on-site staff; reduce or eliminate upland uses likely to generate vessel traffic; boater education and gear damage fund; discontinuance of moorage if shellfish or fishing conflicts result Clean Water Act Section 404 Requirements Needed Eliminate wetland impingements Loss of 100-Year Floodplain Reduce or eliminate millsite development; increase buffer size Increased Demand on Water Supply and Increased Discharge Reduced project size; effluent recycling; rain harvesting; sequence development to prevent additional loading of current water and sewage systems; restrict storage of petroleum and hazardous substances in millsite Impacts on Air Quality Full site contamination characterization; avoidance of contaminated areas; grading and excavation limits; improved construction dust control Impacts on Plants and Animals Reduced project size; wider buffers; limited or no millsite development Increase in Land Transportation and Aquatic Vessel Traffic More low and moderate-income housing; added public or developer-supplied transit; moorage limits; Increased Risk to Human Health Full upland hazmat characterization and remediation before development; moorage and water and air quality controls Cumulative Effects Reduced development intensity and footprint; emphasize restoration and ecological values in shoreline zone Compliance with County Zoning and Comprehensive Plan Additional impartial historic and cultural resource review and advice; enforce Code and plan provisions; added open space within each zone</p>	
Alison O'Sullivan	Suquamish Tribe	n/a	<p>March 22, 2013 Dave Greetham, Planner Kitsap County Department of Community Development 614 Division Street, MS-36 Port Orchard, W A 98366 Re: Port Gamble Redevelopment EIS Scoping PO Box 498 Suquamish, WA 98392-0498</p> <p>Dear Mr. Greetham: The Suquamish Tribe ("Tribe") has given the Port Gamble Redevelopment permit materials preliminary review and has the following comments. The proposed area of discussion lies within the Suquamish Tribes (Tribe) "Usual and Accustomed Fishing Area" (U&A). The Suquamish Tribe is a federally recognized Indian Tribe and pursuant to the 1855 Treaty of Point Elliott the Tribe reserved the right to fish and gather shellfish at its "usual and accustomed" (U&A) fishing grounds and stations in Puget Sound which includes almost all areas of the Puget Sound along Kitsap County's marine shoreline. Therefore, land use decisions and actions within the proposed area of discussion will potentially impact the Suquamish Tribes "Usual and Accustomed Fishing Area". The Tribe seeks protection of all treaty-reserved natural resources through avoidance of impacts to</p>	3/26/2013

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			<p>habitat and natural systems.</p> <p><i>Stormwater</i></p> <p>The Suquamish Tribe is concerned about storm water impacts. Increased urbanization (loss of permeable surfaces to impervious surfaces) directly within a watershed results in loss of riparian integrity, sedimentation and storm water impacts. Storm water runoff is known to increase the frequency and magnitude of peak stream flows, reduce base flows, as well as increasing erosion, fine sedimentation, bank instability, and channel incision and scour. Riparian areas are critical to the ecological integrity of all upstream and downstream habitat areas and should be protected by extensive buffers and limitations on development in adjacent areas. Evaluations of the cumulative impacts of urbanization have determined measurable and significant decline in stream quality in Puget Sound lowland streams that occur at relatively low levels of development, in the 5 to 10% total impervious area range (May 1998, Booth 1993; Knutsen 1997). Increased watershed imperviousness causes greater and faster moving runoff volumes entering wetlands and streams during wet weather (Stockdale 1991), and increased amounts of storm water runoff in wetlands alter water level response times, depths and duration of water detention (US EPA 1993). Conversely in drier months, diminished infiltration in a wetlands' watershed as a result of impervious surfaces can reduce stream base flows and ground water supplies (Azous 1991). In addition, increased impervious surface in a watershed increases the amount of contaminants mobilized by runoff, and a direct correlation exists between percent impervious surface in a watershed and bacteriological water quality (Mallin et al. 2000). It has become increasingly apparent that runoff is the primary threat to water quality (Homer 1997). The Tribe is actively involved in long-term efforts to improve the sediment and water quality within Puget Sound. The Tribe seeks the reduction of fecal coliform levels and other contaminants resulting from point and nonpoint discharge of pollutants, and recommends more adequate enforcement mechanisms. Because the effects of runoff from impervious surfaces are less obvious than those of wetland fill, riparian vegetation removal and impassable culverts, detailed evaluation of their adverse impacts is critical.</p> <p>Sustainable, low impact rural land use should be encouraged, with limits placed on land clearing, forest removal, and construction of impervious surfaces. Although the project mentions the use of rain gardens there are many other Low Impact Development (LID) measures that can be implemented to remove and reduce pollution from runoff to wetlands, streams and receiving waters.</p> <p>LID provides more assurance that treated storm water runoff is not harmful and reduces impacts on watershed hydrology and aquatic resources.</p> <ul style="list-style-type: none"> • The Tribe requests that the SEIS include a determination on the total amount of new impervious, total amount of maximum impervious surfaces that could potentially occur and how much in each sub-watershed, an evaluation of the cumulative effects of urbanization on aquatic systems (impacts to hydrology, surface water quality, and aquatic system functions), and determination of mitigation for unavoidable environmental impacts associated with the increased urbanization. • Low Impact Development options to consider include but are not limited to: minimization of total impervious area, rooftop runoff collection, retention of native vegetation (minimizing clearing and grading), maintaining natural drainages, replacing curb and gutter with swales along roadways, use of permeable pavers, applying smaller lots to allow for the maximum available open space/greenbelt area • The Tribe requests that the EIS include a strategy for treating and controlling 100% (quantity and quality) of the runoff from existing and proposed impervious surfaces. These facilities should be designed in accordance with the latest Department of Ecology Storm water Management Guidelines, and sited outside of critical areas and their buffers. 	

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			<ul style="list-style-type: none"> The grading permit information states that grass will be established and permanent stormwater features will not be needed on the mill site. This is incorrect and will need to be revised and/or deleted. Lawns are not effective at absorbing and retaining water, especially during heavy rains. This is a problem not only because more natural precipitation runs off them, but also because they may require a lot of irrigation, which in turn can create even more runoff. Storm water management should consist of 100% retention and roof run-off infiltration systems with mandatory maintenance. <p>Wetlands and Streams</p> <p>Historically, the small streams of the Puget Sound region have been productive salmon bearing waters. Salmon and trout have significant cultural and economic value to the Suquamish Tribe. In spite of their importance, many salmon runs are in danger of being lost forever (Nehlsen et al. 1991). This is especially true in the Puget Sound Lowland ecoregion, where rapid population growth and widespread development are putting pressure on stream ecosystems (May et al. 1997). These pressures include road crossings, utility-line gaps, and other breaks in the stream-riparian corridor, which fragments habitat, allows direct access of surface runoff into streams, and compromises the effectiveness of the natural buffer surrounding streams (Kitsap County 2000; May et al. 1997). Also, culverts under roadways often restrict salmonid access to spawning and rearing habitat.</p> <ul style="list-style-type: none"> The Tribe contends that wetland and stream impacts can and should be avoided altogether. Typically the steps preceding the need for mitigation include: avoid, reduce and then mitigate (in that order). The Tribe requests that all alternatives considered establish "avoidance" as a central goal. Mitigation options for alternatives resulting in unavoidable wetland and stream impacts must include long term monitoring, maintenance and contingency as well as be examined in the context of likelihood of success. To prevent further degradation WAC 220-110-070 states that existing culverts that impede fish passage must be made fish-passable if the route is improved. Bridges should be included in the EIS as the preferred option where ever needed transportation systems cross streams. The Tribe requests that the streams onsite have WDFW verification and concurrence offish vs. Non-Fish determinations. <p>Floodplain</p> <p>The Kitsap County FEMA Flood Hazard Zone and Floodways Map indicates that the Port Gamble shoreline is within the 100 yr floodplain. Kitsap County has selected to review floodplain development projects on a project by project review. The Suquamish Tribe would strongly encourage both the county and the applicant to consult with either FEMA or the National Flood Insurance Program for guidance regarding development opportunities in floodplains. Marine floodplains are not approached the same as freshwater and it is our understanding that on marine shorelines a property cannot be removed from the floodplain with the addition of fill. Nor can fill be used for structural support.</p> <p>Rural Clustering</p> <p>The Tribe cautions the county in allowing for additional density that could be considered urban or suburban growth in light of the past Court of Appeals decision. The County's previous attempts at rural clustering were not protective of rural character and the issue of legacy lots continue to plague sound planning principals. With the proposed proximity of the residential clusters and the utilization of urban level services it gives the appearance of urban or suburban (not rural) development. The Tribe requests that cluster development directly adjacent to the National Historic Town and/or LAMIRD boundary be removed from the proposed plan.</p> <p>National Historic Town</p>	

Name	Representing	Email Address	Comment	Date
			<p>Utilizing historical development patterns for expansion of residential and commercial growth beyond what is needed to allow infill and provide appropriate services does not comply with the GMA. As per RCW 36.70A.520 "the comprehensive plan and development regulations must include restrictions that preclude new urban or suburban land uses in the vicinity of the town, including the additional limited areas, except in areas otherwise designated for urban growth under this chapter ... ". As stated above the Tribe requests that the cluster development directly adjacent to the National Historic Town and/or LAMIRD boundary be removed from the proposed plan.</p> <p>Cultural Resources</p> <p>Suquamish people lived, gathered food stuffs, ceremonial and spiritual items, and hunted and fished for thousands of years in western Washington. Port Gamble is within the Ancestral Territory of the Suquamish People. Hudson's Bay traders met Suquamish Chief Challicum in 1833, near Port Gamble. A United States Exploring Expedition survey party described the presence of the Suquamish throughout the north end of Hood Canal. Archaeological sites in the vicinity document Suquamish use over the past 2,000 years. Through the course of this occupation, significant archaeological deposits developed. These deposits include but are not limited to significant cultural resources such as shell middens, burial sites and ancestral home sites, the protection of which are important to Native American cultural heritage. The project area has a high probability for significant unrecorded archaeological deposits. Shoreline and near shore uses and development may disturb areas of cultural and spiritual importance to tribal members.</p> <ul style="list-style-type: none"> • The Tribe requests that the EIS process include a thorough assessment of potential cultural resources by a qualified archaeologist and engage in meaningful dialogue with the Suquamish Tribal Historical Preservation Officer (Dennis Lewarch). <p>Treaty Rights</p> <p>The Tribe is concerned that the addition of an undetermined number of docks, mooring buoys and/or marinas (commercial or residential) may interfere with the Tribe's treaty right to harvest fishery resources. The addition of an undetermined number of docks, mooring buoys and/or marinas can be a significant source of fecal coliform, pathogens, and pollutants in water and sediment via boat discharges and spills. The Puget Sound Water Quality Management Plan (2000) states, "marine life can also be threatened by the discharge of sewage from recreational boats even when all the boats have approved and functional treatment systems". Any further degradation of water quality attributed to an increase in the number of vessels in the area may ultimately result in the closure of shellfish growing and harvesting areas.</p> <ul style="list-style-type: none"> • Additional boat traffic increases the potential for conflicts with tribal treaty fishery activities by impeding Tribal fishers' ability to maneuver and safely manage fishing gear and increases the risk of damage to fishing gear. These issues will need to be avoided and/or resolved. • The Tribe requests that the effects of the proposed project on the commercial shellfish growing area classifications in Port Gamble Bay be evaluated in coordination with the Washington Department of Health and the Suquamish Tribe. <p>The Tribe is requesting that Kitsap County address the issues identified in our comments to allow for further evaluation of the DS determination via the EIS process. Thank you for the opportunity to comment on the above referenced proposal. Please keep us informed of project status and any relevant project related actions. We will be providing additional comments as more information becomes available. If you have questions or concerns please don't hesitate to call 360-394-8447.</p> <p>Sincerely, Alison O'Sullivan</p>	

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			Biologist, Environmental Program cc: Gina Piazza, Washington Department of Fish and Wildlife	