

GMA Index

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COPY TO DCD - SCOTT DIENER - Food to Angie Silva

COPIES INDIVIDUALLY
ADDRESSED TO ALL
THREE (3):

October 19, 2006



Commissioner Jan Angel, Chair
Commissioner Patty Lent
Commissioner Chris Endresen
Kitsap County Board of Commissioner's Office
614 Division Street, MS-4
Port Orchard, WA 98366-4676

Dear Honorable Commissioners:

At this time the City is pleased to provide the following comments on Kitsap County's proposed 10-Year Comprehensive Plan Update. We commend the County on its effort to complete this challenging and complicated task by year end 2006. Thank you for the opportunity to respond to the Draft Plan, and we appreciate your consideration of these comments.

This letter reinforces the City's earlier comments dated July 10, 2006, which were provided during the alternatives stage of the update process. The July 10 comments are attached and hereby entered into the official comment record. Our additional comments at this time respond to the County's advanced alternatives as well as recent growth patterns in the field.

We address three general areas: 1) the Central Kitsap UGA, 2) the South UGAs (Gorst, ULID#6 and SKIA), and 3) the Bremerton associated UGAs (East and West). At this time the primary concern for the City of Bremerton is the outstanding non-association of UGAs. We urge Kitsap County to resolve assignment of unassociated UGAs during the 10-Year Comprehensive Update process. RCW 36.70.(A)110 (4) states that Cities are the most appropriate provider of urban services. 36.170 (A) 100 states that County Comprehensive Plans for unassociated UGAs should be coordinated and consistent with the plans of neighboring jurisdictions. Countywide Planning Policy B.3.e stresses coordinated planning of unassociated UGAs with neighboring jurisdictions. These and other State and Countywide planning policies create an expectation that Kitsap County transition unassigned UGAs to the jurisdiction of cities for the provision of a full range of urban services. If assignment of the unassociated UGAs can not be achieved at the time of this update, we request that the County include clear and directive language, and a timeline for the assignment of unassociated UGAs within the Comprehensive Plan document. In this letter, we provide general comments on the proposed Comprehensive Plan, but we also provide an initial outline for our expectations regarding UGA association. Many of our positions on the Comprehensive Plan rest on our expectations regarding future UGA association.

Enclosed with our comments is a schematic map showing a draft proposal for Bremerton UGA associations. We understand that extensive work will be required to achieve new associations, including Urban Growth Area Management Agreements (UGAMA). This draft proposal is generally (but not entirely) consistent with the 2004 Bremerton Comprehensive Plan Eventual Growth Proposal Map.

Minor deviations are attributable to changed political and physical circumstances since the adoption of our 2004 Comprehensive Plan. Bremerton is prepared to make Comprehensive Plan amendments as necessary to ensure consistency with any association of UGAs that results from a collaborative interjurisdictional process.

CENTRAL KITSAP UGA

Associate Central Kitsap UGA: It continues to be our expectation that the City and the County will undergo a collaborative process to associate the Central Kitsap UGA with the City of Bremerton. Barker Creek is a natural urban separator between Bremerton and the future City of Silverdale. Specific language and a timeline should be included in the Comprehensive Plan document regarding the future association of the Central Kitsap UGA with Bremerton.

Alternative 2: We continue to support the general direction and overall organization of Alternative 2. We strongly support a dense, high intensity mixed use corridor along Wheaton Way as an urban 'spine' in Central Kitsap.

Population Banking: We support the County's proposal to use population banking as a method to allocate anticipated growth that can not be fully accommodated in Central Kitsap. Some or all of this excess population can be reallocated to Center districts in the City of Bremerton where there is ample capacity.

Urban Restricted: There is some concern about the amount and scale of the Urban Restricted designation, which does not encourage truly urban density within this UGA. However, if these designations are adequately balanced by intensive urban designations in appropriate locations, and if urban restricted designations are a result of legitimately unique conditions such as critical areas, or irreplaceable green space heritage, the City of Bremerton can be supportive of these designations for the purposes of this Comp Plan update. However, we prefer to see all areas that are within the UGA that are not substantially encumbered by critical areas designated for an urban density of at least 4 units per acre.

No Central Valley Extension: We oppose any extension of the UGA north of Waaga Way into Central Valley. Waaga Way is a clear and logical urban boundary.

No Brownsville Extension: We oppose the expansion of the UGA to include the Brownsville area as shown in Alternative 2. The UGA should not be expanded to include this area if the bulk of the expansion will be designated Urban Restricted.

SOUTH UGAs (GORST, ULID #6, SKIA)

Associate Gorst UGA with Bremerton: It is our expectation that the City and the County will undergo a collaborative process to associate the Gorst UGA with the City of Bremerton. Recent infrastructure extensions make this the logical and appropriate association for the Gorst UGA. Bremerton is currently implementing a project to extend a sewer main line through Gorst to the Sinclair Ridge vicinity. (See enclosed summary of the Southwest Bremerton Residential Sewer Service Extension provided by the Bremerton Department of Public Works and Utilities.) As the

primary provider of key urban services, Bremerton is the most appropriate and efficient jurisdiction to eventually govern Gorst. Specific language and a timeline should be included in the Comprehensive Plan document regarding the future association of the Gorst UGA with Bremerton, and there should be a specific timeline for a UGAMA.

Associate ULID #6 with Port Orchard and Bremerton: It is our expectation that jurisdictions will work together to determine which portions of the ULID #6 UGA will be associated with Bremerton and which will be associated with Port Orchard. Past discussion between jurisdictions on the interface between Bremerton and Port Orchard reached no resolution. Due to recent developments and growth patterns we suggest that the logical divider (as shown in the attached Draft Map) is Old Clifton Road. Bremerton is facilitating the development of the Sinclair Ridge project immediately north of ULID#6 within existing city limits. Bremerton is also providing water service to the pending McCormick North development immediately adjacent to City limits to the south of Old Clifton Road. Specific language and a timeline should be included in the Comprehensive Plan document regarding the future association of the ULID#6 UGA with Port Orchard and Bremerton.

It is in the interest of the citizens of Bremerton for communities at the toe of Sinclair inlet to eventually transition to the City's jurisdiction. We believe the toe of Sinclair inlet is the visual and physical gateway to the City of Bremerton. Bremerton will maintain jurisdiction of the Sinclair Ridge area, and proposes association of the small portion of ULID #6 as far south as Old Clifton Road with Bremerton. This maintains the status quo east / west urban separator of the rugged area east of Anderson Hill Road, and posits SW Old Clifton Road as a clear north / south divider between Bremerton and Port Orchard. Although the city does not endorse narrow corridors to expand UGA boundaries as noted in our July 10 letter, this scenario allows for the association of the bulk of ULID #6 with Port Orchard via the tenuous UGA 'finger' expansion to the existing McCormick Woods development, if approved.

BREMERTON ASSOCIATED UGAs (EAST & WEST)

The only general comment on designations within the existing Bremerton UGAs is as follows. To the greatest extent possible, do not designate new commercial, or multi-family areas in locations entirely unaffiliated with Bremerton's Center locations. We do acknowledge that population allocation goals make this request a challenging one. Where commercial or multifamily developments must be added for population allocation purposes make every effort to minimize their scale, locate them near adequate roadway and utility infrastructure and near support services. The growth policy of the City of Bremerton is to concentrate new mixed use, commercial and multi-family development in Center locations, and to enhance the livability and owner occupancy of single family neighborhoods.

Sincerely,


Cecil McConnell, President
Bremerton City Council

cc: Mayor Cary Bozeman
Bremerton City Council Members
Andrea Spencer, Director of Community Development



CITY COUNCIL 345 6th Street, Suite 600, Bremerton, WA 98337-1873 ☐ (360) 473-5280

July 10, 2006

Commissioner Jan Angel, Chair
Commissioner Patty Lent
Commissioner Chris Endresen
Kitsap County Board of Commissioner's Office
614 Division Street, MS-4
Port Orchard, WA 98366-4676

Dear Honorable Commissioners:

On behalf of the citizens of Bremerton, the City of Bremerton provides the following comments on the proposed land use Alternatives of the Kitsap County 10-year comprehensive Plan update. When considering these comments, we urge County decision-makers not to underestimate the impact these land use choices will have on the future health and welfare of the City of Bremerton. Ultimately, the City will be responsible for providing urban services and governance to the Urban Growth Areas at the edges of our City. Our comments are rooted in the vision and goals of our 2004 Comprehensive Plan and a fundamental desire to create a community with sustainable health, efficiency, and vitality as we grow.

We provide comments specifically on the Alternatives for the following UGA's, all of which directly border our City: Central Kitsap UGA, East Bremerton UGA, West Bremerton UGA, Gorst UGA, SKIA UGA, Port Orchard UGA.

Central Kitsap UGA

CK – 1. Associate 'Central Kitsap' UGA with Bremerton: We oppose the continued representation of this area as a UGA separate from Bremerton, titled the 'Central Kitsap' UGA. Further, we have yet to receive the County's analysis of adequate service capacity to support UGA designation that we have requested in past correspondence (the informal acknowledgement is that there is no documented analysis of service capacity).

Under the protocol of 36.70A.110 RCW (- cities propose UGA's and counties respond -) and the Kitsap Countywide Planning Policies, the proposed association of this UGA with Bremerton was initially communicated in our 2004 Comprehensive Plan, and the County raised no issue in its review at that time (of note, other City proposals were challenged).

Bremerton has reiterated our proposal on numerous subsequent occasions. Discussions with County officials early in your update process suggested that a formal association of this area with Bremerton would be included. The Plan's intent to achieve association is a necessary prelude to reaching an Urban Growth Area Management Agreement. **As a response to the City's proposal, the County has two options: 1) associate the East Bremerton UGA in your 10-year update or 2) provide a reason in writing why you choose not to.**

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CK-2. Select a Modified Alternative 2: Of the three alternatives presented, we strongly support an alternative similar to the overall direction and form shown in 'Revised Alternative 2'. The following sub-points detail our reasons for supporting Alternative 2:

CK-2a. We strongly support a more dense development pattern with a mix of uses in the Wheaton Way corridor south of Fairgrounds Rd. The corridor is not a "tourist highway" – the "**Highway Tourist Commercial**" designation is fully inappropriate and should be revised to a community-serving commercial designation. The future for Wheaton Way can be one of a vibrant and dense mixed use corridor with a boulevard character – not a strip commercial highway like Highway 99 in the West Puget Sound. New commercial uses should be limited to infill sites.

CK-2b. We strongly support the inclusion of high density housing in the Wheaton Way Corridor south of Fairgrounds Rd. An allowance for housing should be included in the 'mixed use' areas shown on Wheaton Way. (See also CK-6 below). The mixed use designation should limit the gross square foot area of individual retail establishments to a community rather than regional scale.

CK-2c. We support the generous designations of 'Urban Restricted' to protect environmentally sensitive areas and to preserve an urban open space greenbelt, as mandated in 36.70A.160 RCW, in the lesser developed areas of East Bremerton, including the Illahee and Central Valley areas. These designations also help clarify where and how urban infrastructure extensions should take place over time.

CK-2d. The preservation of a non-urban Rural Residential area as a separator in the vicinity of Barker Creek is crucial to meeting the provisions of Countywide Planning Policies and 36.70A.160 RCW. This non-urban designation is the only opportunity to visually and physically differentiate the communities of Bremerton and Silverdale on the east side of Dye's Inlet with an open space greenbelt.

Our other requested modifications to the Central Kitsap UGA Draft Alternative 2 are:

CK-3. North Perry Avenue. Remove the Mixed Use and Medium Density Residential designations from the Perry Avenue corridor. The Bremerton Comprehensive Plan directs new mixed use and multifamily development to center locations, and shows the Perry Avenue corridor as low density residential. **The proposed land use pattern is**

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antithetical to the City's centers growth strategy that is also embedded in PSRC's Vision 2020 and the Kitsap Countywide Planning Policies.

CK-4. Non-centers Oriented Multi-family. Remove the Medium Density Residential from all properties not linked to the development of a center in several locations in the vicinity of McWilliams, Fairgrounds, and John Carlson Roads. Bremerton's policy is to direct new multifamily development to mixed use centers where there is convenient access to services and transportation. **We oppose the inclusion of an isolated pocket of multi-family residential at this location as contrary to a centers growth strategy.**

CK-5. Brownsville / Gilberton. Remove the Brownsville area from UGA designation. There is no compelling reason why this area should be slated for urban development at this time, especially since a substantial portion of this vicinity would be shown as Urban Restricted under Alternative 2. Gilberton, as an "urbanizing area" needing urban services, may be included. The retention of a non-urban separator west and north of the Gilberton area, along with rural Barker Creek, would reinforce the eventual northern boundary of the City of Bremerton.

CK-6. Full Mix of Uses. It is not clear at this point what range of uses will be allowed in the Mixed Use designation shown along Wheaton Way. **We support the Mixed Used designation and a land use mix that allows for substantial housing, not just a wide range of commercial uses.** Housing on Wheaton Way south of Fairgrounds Rd. is logical and can work. A buffer between the boulevard and the housing is not necessarily required if designed properly – especially on sites with substantial depth. The Mixed Use designation on Wheaton Way should encourage multiple story construction with quality design and street-fronting buildings when carried out with zoning rules. Bremerton is already experiencing a positive market response to this land use concept.

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CK-7. Failure to Achieve Zoned Densities. Despite the 5-9 units per acre urban residential zoning that applies to most of the UGA, actual development is often attaining only a fraction of that density. Recent plats reviewed by the City are not serviced by sewers and are approved at nearly one unit per acre. Not only does this practice consume valuable capacity for new, urban housing, the overall development pattern that it produces insures that the area can not infill to urban densities. In essence, the designation of Central Kitsap as a UGA, without sewers but continued platting, is creating the suburban development pattern that gave us the GMA.

CK-8. On Density Generally. If greater density is required to balance the removal of those pockets of multi-family residential that detract from rather than support the creation of centers, it should be located within the Wheaton Way corridor south of Fairgrounds Rd. by encouraging housing within the Mixed Use designation and perhaps increasing the geographic extent of High Density Residential. In the long run, increased density on Wheaton Way can create a high-service transit corridor, supported by local-service commercial uses, stretching all the way to the Downtown Regional Center (and ferry terminal).

Selection of any Central Kitsap UGA alternative that substantially deviates from the general direction and form of Alternative 2 can not be supported by the City of Bremerton.

F11 cont-1

East Bremerton UGA

EB-1. Select Alternative 1: Of the three alternatives presented, we strongly support the no-change option shown in Alternative 1. The significant expansion of Urban Medium Residential westward of Pine Road shown in Alternatives 2 and 3 will undermine the fabric of this neighborhood as well as the potential for the City's designated center at Pine Road and Sylvan. Furthermore, Alternatives 2 and 3 indicate expansion of the Mixed Use and Urban Medium Residential in a strip-like manner along Perry Avenue, also producing significant negative impacts to the surrounding neighborhood. The City's Comprehensive Plan designates a Neighborhood Center focused on the Perry Avenue Mall and including higher density housing around it. The proposed County designations undermine the City's commitment to this center.

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West Bremerton UGA

WB-1. Navy Yard City – We support Land Use designations in Navy Yard City similar to those shown on Alternative 1, the existing land use designations, with several modifications. Bremerton will be exploring a full annexation of the Navy Yard City area within the year, setting the stage for sub-area planning to establish appropriate land use designations. In the meantime land use designation to reflect the general pattern of existing uses should be applied.

WB-1a. Replace Highway Tourist Commercial. Areas of Highway Tourist Commercial on National Avenue, Charlotte Avenue, and Dora Avenue should be replaced with Neighborhood Commercial or other lesser intensity designations. These primarily local-serving streets are not suited to Highway Tourist "strip" Commercial. Also, the presence of a neighborhood-serving elementary school at the intersection of Loxie Eagans and National Avenue is a poor location for auto-oriented commercial uses.

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WB-2. Southward Expansion of UGA (Sherman Heights). Bremerton is not opposed to limited southwestward expansion of the UGA in the vicinity of Kent Ave. and Front Ave., provided: 1) the land use designation for the expanded UGA area is Low Density Residential and 2) expansion only includes existing urban density, vested, plats. Bremerton's Comprehensive Plan does not provide for new multi-family in isolated locations outside of designated centers. The terrain of Sherman Heights is not conducive to intense, mixed use centers development and is therefore not appropriate for any medium density residential designation.

WB-3. Sunnyhill Road 'Island'. Bremerton supports the land use scenarios of Alternative 1 or 3 in the unincorporated Sunnyhill Road area. As previously noted,

addition of new multi-family residential isolated from the services and transportation choices provided in centers is not supported by the Bremerton Comprehensive Plan.

WB-4. Rocky Point. Bremerton strongly supports the inclusion of the Rocky Point peninsula within the UGA as shown in Alternative 3. The peninsula is surrounded by the City of Bremerton, making it geographically inefficient for any other jurisdiction to serve. Rocky point is developed with a character and level of density similar to that of other sections of the City of Bremerton such as Marine Drive. Bremerton can efficiently serve Rocky Point while assisting the peninsula's incremental change to urban character.

WB-4a. Bremerton opposes the expansion of medium density residential designation into the Rocky Point area. Designations in Rocky Point should be low density residential as shown in Alternative 3. Bremerton strongly opposes the addition of medium density residential on the west side of Corbett Drive as shown in Alternative 2. Any plan for increased density in this area should only be structured around a center, either Neighborhood or District.

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South Kitsap Industrial Area (SKIA) UGA

The following comments pertain to the South Kitsap Industrial Area.

SKIA – 1. Future Association of 'SKIA' UGA With Bremerton. Although Bremerton's 2004 Comprehensive Plan shows SKIA within the City's eventual growth proposal, it also states that association for annexation is not an immediate City objective. However, we reiterate our position that, eventually, SKIA – contiguous to Bremerton and no other city – must be associated with Bremerton for annexation. The language in the Bremerton Comprehensive Plan should be reflected in the County Plan for consistency.

SKIA-2. Select 'Alternative 1' or Similar. Bremerton supports a land use alternative for SKIA similar in scope and intent of Alternative 1, the existing land use designation. This is generally consistent with the 2004 Bremerton Comprehensive Plan. In this pattern, the bulk of the SKIA UGA retains an industrial designation, and there is no expansion of the UGA boundary.

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Bremerton recognizes that a major factor in the future land use pattern of the SKIA area may be linked to the proposed NASCAR track. However, regardless of the track's future, land use choices for the area should follow several principles. There should be no substantial expansion of the UGA (as shown in 'Alternative 3'). There should also be no substantial expansion of Business Center and the wide range of non-industrial uses that such an expansion would encourage. SKIA is most appropriate for industrial, and the high-intensity / high-impact uses that industrial designations encourage. If a track is built at SKIA, a substantial portion of support services for visitors and business should be channeled to existing or already urbanized areas. This is more efficient and logical than locating the bulk of support services in a wholly new urban area at the southern fringe of Kitsap County, where there would be greater potential for conflict with existing and future year-round industrial activities.

Gorst UGA

G-1. Associate 'Gorst' UGA with Bremerton: We oppose the presentation of this area as a UGA separate from Bremerton. Countywide Planning Policy (CWPP) 2 (b) addresses urban growth areas and states that unincorporated UGAs should be associated with an existing or future city. Bremerton surrounds Gorst on three sides and is the closest provider of urban services – no other city is within the proximity, and no other city can provide the full range of urban services without going through Bremerton. There can be no other logical decision than to associate Gorst with Bremerton, and there is no reason not to do so now.

G-2. Select Modified Alternative 1: Of the three alternatives presented we support an alternative similar to the overall direction shown in 'Alternative 1'. This alternative most closely represents the boundaries and land uses presented in Bremerton's 2004 Comprehensive Plan. Alternatives 2 and 3 change the boundary of the UGA to include a large section of mineral resource land. Bremerton is not opposed to the extraction of mineral resources in the rugged areas adjacent to Gorst, however it is not clear at this point why such activities must be located within the UGA. In coming years the City of Bremerton will explore annexation in the Gorst UGA. We request no dramatic expansion of the Gorst UGA until such time that the City has had opportunity to do more specific study to determine the most efficient and orderly land use pattern in Gorst.

G-3. Expanded Strip Commercial: Alternatives 2 and 3 show expansion of a new area of Urban Commercial northeasterly along Highway 3. This is inconsistent with the Bremerton Comprehensive Plan and contrary to City Policy against the proliferation of new areas of strip commercial. Gorst holds much higher potential as a mixed use center with some regionally-serving retail focused on the intersecting state highways. Any change to existing land use designations should be deferred until the City facilitates a sub-area plan with the community of Gorst.

Port Orchard UGA Expansions Contiguous to SW Bremerton (Barclay's North)

We can only support Alternative 1 in the vicinity of SW Bremerton. We also question why any of these alternatives are presented as 'Port Orchard UGA' alternatives – the proposed expansions include lands currently contiguous to Bremerton. If these lands are proposed for future urban development, Bremerton certainly has a formal role in the ultimate decision on association and provision of services.

SWB-1. Gerrymandered UGA Boundaries: The three expansions of urban growth areas between Port Orchard and Bremerton are clear violations of "logical urban boundaries" as well as the Countywide Planning Policy on maintaining non-urban separation between urban communities.

SWB-2. The most flagrant of the illogical extensions is the proposed "tentacle" of UGA expansion along Highway 166 to grab a small corner of unincorporated land that is 50% contiguous to the City of Bremerton. City utility land is immediately south of these parcels,

and the City accesses its facilities through this area. If this small patch of land is to become urban, it will be as a part of Bremerton.

SWB-3. The gerrymandering of boundaries in Alternative 2 and 3 are clearly an attempt to eventually link the City of Port Orchard to the McCormick Lands developments. McCormick North is contiguous to the City of Bremerton and no other city is as close. We fail to see the logic in extending a Port Orchard UGA to lands currently adjacent to the City of Bremerton.

SWB-4. Alternatives 2 and 3 expand the UGA into rural lands but create vestigial "islands" of rural lands in the process. This is fully contrary to logical expansion of urban service areas and patterns of urban growth. We oppose this practice within the county.

GENERAL COMMENTS ON THE ALTERNATIVES

Land use designations that depart from the centers urban growth strategy embodied in the Countywide Planning Policies and Bremerton Comprehensive Plan are highly problematic. Once established in the County's Comprehensive Plan, new designations set expectations that are hard to undo. We see no reason for the County to apply its resources and time now to put new designations in place that will have to be revisited at the conclusion of UGAMA agreements. Any changes eventually required for consistency with the City's growth policies may face even stiffer opposition from affected property owners if development expectations to the contrary are generated by the County now.

We are further impressed that the scattered multi-family housing designations seem to take advantage of available sites rather than expressing a deliberate vision of healthy urban growth. The intermixing of higher-density housing within lower density settings with no corresponding neighborhood benefit is a recipe for neighborhood conflict and decline. Bremerton and many other cities (Seattle, Spokane, and Tacoma among others) have abandoned that development pattern as detrimental to the maintenance of quality residential environments. In all cases, we oppose such designations.

Similarly, the linear expansion of commercial areas along arterials and highways is contrary to widely recognized principles for creating healthy urban environments. Such patterns add new edges of land use conflict between commercial and residential uses, often in the midst of low-density neighborhood settings where quality of life is most greatly affected. This is a classic auto-oriented, sprawl-inducing practice, and we oppose its application anywhere within the County.

The Council is in receipt of the May 8, 2006, letter from the mayors of the four Kitsap cities to the Board that states, "... our county must do much better at managing growth in balance with a desire for a prosperous, sustainable future ... and we must quickly get onto a different path than the one we're on." With each of the County's update alternatives maintaining or expanding strip commercial, failing to promote the creation of mixed use centers, and retaining hap-hazard distribution of higher density housing – and two alternatives adding substantial lands to urban growth areas – we fail to see progress towards a new direction.

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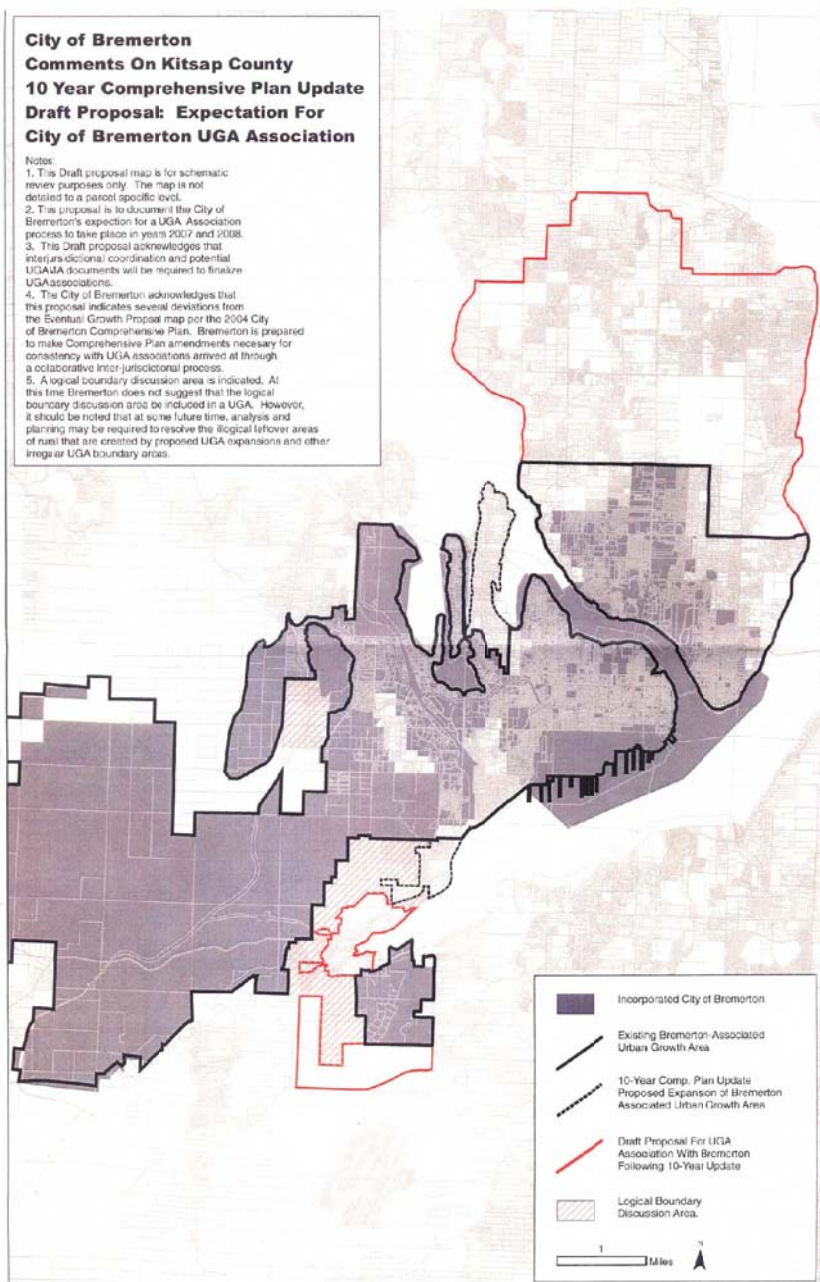
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**City of Bremerton
Comments On Kitsap County
10 Year Comprehensive Plan Update
Draft Proposal: Expectation For
City of Bremerton UGA Association**

- Notes:
1. This Draft proposal map is for schematic review purposes only. The map is not detailed to a parcel specific level.
 2. This proposal is to document the City of Bremerton's expectation for a UGA Association process to take place in years 2007 and 2008.
 3. This Draft proposal acknowledges that interjurisdictional coordination and potential UGA/UA documents will be required to finalize UGA associations.
 4. The City of Bremerton acknowledges that this proposal indicates several deviations from the Eventual Growth Proposal map per the 2004 City of Bremerton Comprehensive Plan. Bremerton is prepared to make Comprehensive Plan amendments necessary for consistency with UGA associations arrived at through a collaborative inter-jurisdictional process.
 5. A logical boundary discussion area is indicated. At this time Bremerton does not suggest that the logical boundary discussion area be included in a UGA. However, it should be noted that at some future time, analysis and planning may be required to resolve the illogical leftover areas of rural that are created by proposed UGA expansions and other irregular UGA boundary areas.



Letter 002

Rec'd @ 9/21/06 P.H.
Submitted by Ken Attebery



RECEIVED
SEP 21 2006
KITSAP COUNTY DEPT OF
COMMUNITY DEVELOPMENT

September 21, 2006

PORT COMMISSIONERS
Mary Ann Huntington
Cheryl Kincer
Bill Mahan

Kitsap County Commissioners
Kitsap County Planning Commission
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RE: 10-Year Plan Update, SKIA Section, SEPA Lead Agency Authority for Port Projects

Dear Commissioners and Planning Commission,

The Port requests that the County remove SKIA policies 12 and 13 (sub 15) in the proposed 10-Year update plan and thus return to the Port its legal authority under the State Environmental Policy Act (SEPA) and its implementing rules to act as "lead agency" under that law for its own projects. There does not appear to be a contemporary sound identifiable policy nexus for these two policies. Beyond this they add duplication to the Port's and the County's planning and delivery of economic development projects.

This policy and a performance guideline placed in the 2003 plan has not yet been actively pursued by either the Port or the County and reasoning for the initial decision is now not clear to either Port or County staff. Discussions have been held recently with the County's environmental staff and the manager of the 10-Year Update. At this level there is no objection for elimination of this awkward and curious approach to SEPA compliance. All agree that adequate safeguards for the County are provided in RCW 43.21 and its implementing regulations WAC 197-11.

This RCW and WAC allow the County to comment on, challenge the environmental review process and documentation, invoke State DOE intervention, and in fact take over the lead agency role on any project for which it is must take an action (construction permits approval being the most obvious example).

Additionally, there are the matters of efficiency and liability for both agencies. Using the logic of the state law, and a goal of recent land use and environmental legislation, we will reduce redundant and repetitious steps in the land development process if the Port is allowed to exercise its legal authority to act as lead agency for SEPA processes. The Port would carry the burden of the proper conduct of the process and the adequacy of the environmental documentation. There is no sound reason for the Port to ever conduct a less than adequate SEPA analysis or process on its own projects thus opening the endeavor to challenge. That would be self defeating and harm the Port's best interests in moving sound economic development projects ahead.

Again, it is our understanding that your staff agrees with this analysis and the Port's request. Thank you for considering this request.

Sincerely,

Kenneth W. Attebery
Chief Executive Officer

Letter 003

From: "Ken Attebery" <KenA@portofbremerton.org>
To: "Eric Baker" <Ebaker@co.kitsap.wa.us>, <jbolger@co.kitsap.wa.us>, <oroberts@co.kitsap.wa.us>, <asilva@co.kitsap.wa.us>
Date: 9/22/2006 4:37:01 PM
Subject: Port Written Comments on Transportation Issues

Attached are Port of Bremerton comments/testimony on the 10-Year Update Transportation and SKIA section.



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 Mary Ann Huntington
 Cheryl Kincer
 Bill Mahon

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September 21, 2006

Kitsap County Commissioners
 Kitsap County Planning Commission
 614 Division St MS-1
 Port Orchard, WA 98366

RE: 10-Year Plan Update, SKIA Section, Transportation

Dear Commissioners and Planning Commission,

The Port requests that the County add two Transportation policies to the SKIA Sub-Area Plan section of the 10-Year Update version of the Comprehensive Plan.

As the Port testified last evening, it can be very important to have policy support in planning documents when seeking assistance from other agencies particularly funding assistance from state and federal sources.

To this end, and in support of a regional project the County has consistently supported, the Port asks that the following two policies be included in the SKIA section under the Transportation. The particular issue is the conduct of a State DOT corridor study along SR3 and SR16 in support of the economic development in the County and particularly SKIA. The study would identify and prioritize transportation projects to provide capacity, prevent congestion, enhance safety and better facilitate all modes of transportation.

Add a SKIA 31.1 to read: "Encourage the Washington State Department of Transportation to continuously consider capacity and congestion-relief improvements along the SR3 and SR16 corridors, both of which serve SKIA."

Add a SKIA 31.2 to read: "Encourage the Washington State Department of Transportation to undertake a comprehensive corridor study of SR3 from SR101/SR102 in Mason County to SR16 at Gorst, and from SR16 from Pierce County to SR310 in Bremerton."

Thank you for considering this request.

Sincerely,


 Kenneth W. Attebery
 Chief Executive Officer

Letter 004

From: Jim Bolger
To: Silva, Angie
Date: 9/22/2006 11:43:40 AM
Subject: Fwd: Port Written Comments of Today and over the Weekend

>>> "Ken Attebery" <KenA@portofbremerton.org> 9/22/2006 8:29:36 AM >>>
Jim and Eric,

At last evenings hearing it was mentioned that written comments if they are going to get to the Planning Commission for consideration need to be in asap for their Monday review.

Attached is the first of a couple we will submit. This one is on the Econ Dev section. Unfortunately it is all I could get to before a trip to Oly this AM and early afternoon. I hope to get a second one to you by day's end.

I trust you will be sending our letters out as soon as you get them so the Planning Commers can have them available over the weekend if they what to review them, much as written comments that may have come in last evening will be handled I suspect.

So.....to facilitate getting things to the Planning Commission is there any short cut for me to send our letters directly to them later this evening or over the weekend?

(Opal, how is Commer Angel getting updated on this whole plan adoption process?)

Ken Attebery
CEO
360.674.2381 x21
fax: 360.674.2807
email: kena@portofbremerton.org



September 22, 2006

Kitsap County Commissioners
Kitsap County Planning Commission
614 Division St MS-1
Port Orchard, WA 98366

PORT COMMISSIONERS
Mary Ann Huntington
Cheryl Kinser
Bill Mahan

GENERAL OFFICES
8850 SW State Hwy 3
Port Orchard, WA 98367

BUS: (360) 674-2381
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BREMERTON NATIONAL AIRPORT
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OLYMPIC VIEW BUSINESS AND INDUSTRIAL PARK
(360) 674-2381

PORT ORCHARD MARINA
(360) 876-5535

BREMERTON MARINA
(360) 373-1035

RE: 10-Year Plan Update, Port of Bremerton Economic Development Chapter Comments

Dear Commissioners and Planning Commission,

The Port's general comment on this section is that much of the richness and many of the actionable ideas contained in the 1998 plan which really lead to change and progress have been lost through the 10-Year process of consolidation and integration of the old plan into the new. Our fear is that many of the specific action ideas will be lost to future plan users unless they are preserved in the most currently adopted documents.

A prime example of this can be seen in the deletion of policy ED-5 Policy contained in the 1998 plan and now indicating that this policy is "covered in Goal 1 and the underlying policies" of the 10-Year Update. The 1998 ED-5 from the May 7, 1998 plan speaks to encouraging business incubation, business incentives and gives specific examples. The 10-Year Goal 1 only speaks to quality of life, and encouraging a variety of cultural, tourism and recreation programs and facilities. Neither this goal nor the "underlying policies", four in number, even hint at the concept of business incubation or business incentives.

Requests Regarding "Deleted Economic Goals and Policies" described on 5-6 and 5-7

ED 5 (1998 Plan): Retain, as it provides good examples of specific means of attaining economic growth. (see comment above)

ED 7 (1998 Plan): Retain some version, as it may be the only currently adopted county policy that speaks directly to the County's commitment to actively, with its resources, participate in countywide long range economic development work.

ED 9 (1998 Plan): Retain some of the detail in the 1998 Plan version regarding the certainty of the "will receive development incentives" language vrs. the "recognize" language in new ED-4. This is another good example of how the specifics and tangible actionable ideas are lost in the consolidation and integration process of the 10-Year process.

Goal 11 (1998 Plan): Retain as it specifically speaks to a cooperative action to be undertaken by the County and the Port. The suggestion that the 10 Year Goal 3 and ED-30 cover this specific is not true. The new items only refer to identifying land and preserving facilities and cooperating in establishing an air transport system. There is no specificity and our fear is that these specific action ideas will be lost unless preserved in the most currently adopted documents.

Thank you for considering these requests.

Sincerely,

Kenneth W. Attebery
Chief Executive Officer

Letter 005

From: "Ken Attebery" <KenA@portofbremerton.org>
To: "Ken Attebery" <KenA@portofbremerton.org>, "Eric Baker" <Ebaker@co.kitsap.wa.us>, <jbolger@co.kitsap.wa.us>, <oroberts@co.kitsap.wa.us>, <asilva@co.kitsap.wa.us>
Date: 9/23/2006 9:36:51 AM
Subject: RE: Port Written Comments on Aviation Issues

Attached are Port of Bremerton comments/testimony on the 10-Year Update's Aviation Issues and Proposed Regulations.

Ken Attebery
CEO
Port of Bremerton

September 23, 2006

Kitsap County Commissioners
Kitsap County Planning Commission
614 Division St MS-1
Port Orchard, WA 98366

RE: 10-Year Plan Update, SKIA Section, Aviation

Dear Commissioners and Planning Commission,

The Port requests that the County reconsider the proposed deletion of an important regulation regarding the protection of airport environs. The section is KC Code Section 17.375.090. The second sentence, starting "Adjacent to airports..." contains an important implementation technique to protect the approaches to airports. Retaining the concepts in this regulation is an important step in meeting GMA requirements that plan goals and policies be implemented through regulations.

The Growth Management Act lists airports and aviation facilities as essential public facilities. The 1998 County Comprehensive Plan recognizes airports as essential public facilities and provided several goal and policy statements related to the protection of the County's airports. Particularly related to the Port's request is 10-Year Update Transportation Policy T-117. This policy speaks to the County incorporating aviation transportation considerations in land use decisions and establishing ordinances and procedures to ensure use appropriateness in airport environs. This theme is continued in the Transportation chapter at T-122, and in the SKIA chapter at SKIA Goal 38 and SKIA Policy 43.

The tools referenced in the SKIA goal and policy, the Federal Aviation Administration FAR Part 77 and Washington State DOT publication "Airports and Compatible Land Use" are important to the protection of the GMA essential public facility.

In order to implement the above stated goals and policies, the Port requests that a KC Code 17.375.090 section be retained and be rephrased to read, "*17.375.090. Adjacent to airports the Director shall impose height and other land use controls as deemed essential to protect the air space surrounding and approaches related to airports as essential public facilities. Applicable guidance comes from federal and state regulations and guidelines including but not limited to FAA FAR Part 77 and Washington State DOT publication "Airports and Compatible Land Use."*

Thank you for considering this request.

Sincerely,

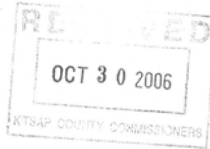
Kenneth W. Attebery

Kenneth W. Attebery
Chief Executive Officer



PORT OF ILLAHEE

P.O. Box 2357, Bremerton, Washington 98310



25 October 2006

Commissioner Jan Angel, Chair
Commissioner Patty Lent
Commissioner Chris Endresen
Kitsap County Board of Commissioner's Office
614 Division Street, MS-4
Port Orchard, WA 98366-4676



Subject: Comments on 2006 Comprehensive Plan Update

Dear Commissioners:

The Port of Illahee is extremely interested in the current land use decisions being considered as part of the 2006 Comprehensive Plan Update. The land use decisions of the 1980's contributed to the problems we have with Illahee Creek and any inappropriate zoning decisions being considered today could further exacerbate those problems.

Specifically the Port of Illahee has three major areas of concern, some of which may have already been addressed by others in the Illahee community.

The first is the groundwater recharge issue along Fir Drive. We are the recipients of a copy of a letter from Dr. Joel Massmann, dated 17 October 2006, which verifies the Ports concerns and substantiates previous studies, that the base flow in Illahee Creek is in jeopardy from higher impact development in this area (the letter was provided to you on October 23, 2006 at the public hearing). We have reviewed Dr. Massmann's extensive teaching and work experience and agree with others that his credentials are outstanding and his assessment is not to be discounted. We therefore request that the groundwater recharge area north and west of Fir Drive as stated in Dr. Massmann's letter, be zoned Urban Restricted (1-4 units). In fact, based on Dr. Massmann's assessment, and the Aspect Consulting Base Flow study done for the Port, and the need to protect the base flow for the salmon in the stream, we can see no logical reason for not granting this rezoning request.

Secondly, we want to make sure that the mistaken rezoning of the Illahee North community to Urban Restricted, be reapplied to the headwaters area of the North Fork of Illahee Creek between Sunset and East Boulevard. It was a similar headwaters rezoning

effort in the 1980's that contributed to the storm surges mentioned earlier. The Illahee Community CAG has advised us that this mistake has been recognized by staff who has recommended its correction.

Third is our concern over the rezoning of Rolling Hills Golf course from Urban Restricted to Urban Low. We concur with many others that this golf course should remain a golf course and the only sure way to do so is to have the county, or some other public entity, purchase it. We also know that until such a purchase is complete, the property could be sold and developed. The Port and knowledgeable storm water personnel are looking at areas within the golf course proper where detention or retention ponds could be placed to help correct the storm water surges that plague Illahee Creek. The golf course is a key element to correcting the storm water problems and increasing the zoning does not further those efforts. We would surmise the present Urban Reserve classification best fits the golf course until such time as a purchase can be negotiated.

Thank you for your consideration of these items and for your continued support of the Port of Illahee, the Illahee Community, and in this particular instance, Illahee Creek, which has been labeled in the community as "A Salmon Stream Worth Saving."


Dennis Sheeran, Chair


George Schaefer


Don Deitch

Copy to:
Department of Community Development
Department of Facilities, Parks & Recreation
Suquamish Tribe
Illahee Preserve Stewardship Committee
Illahee Forest Preserve
Illahee Community Citizens Advisory Group (CAG)
Illahee Community Club (Audrey Boyer)

3 cont.

**Kitsap County 10-Year Comprehensive Plan Update
August 2006
Suggested Revisions pertaining to North Perry Avenue Water District**

Appendix A, Capital Facilities Plan

Page 127, last paragraph –

Water System Comprehensive Plans are required to be updated every 6 years not every 5 (WAC 246-290-100).



Page 132 – Suggest the following revisions to clarify the description of North Perry's service area:

North Perry Avenue Water District. North Perry Avenue Water District extends from Illahee to Keyport Road along Port Orchard Bay and is bounded to the south and west by the City of Bremerton. Although the two systems are connected, this interconnection is not currently utilized. However, it could be activated to aid either district under emergency conditions.



Silverdale Water District bounds North Perry Avenue Water District to the west. The long-range plan for ~~the North Perry Avenue and Silverdale the two~~ districts is to enter into an agreement to intertie strictly for emergency use. A portion of North Perry Avenue Water District's service area west of Central Valley Road was recently designated an uncontested overlap with Silverdale Water District. This recent change to the boundary took into consideration demand and growth factors to the area and, therefore, no further changes to the North Perry Avenue service area are anticipated in the near future.

KPUD bounds North Perry Avenue Water District to the north. At the end of 1989, the KPUD took over a small section of the north end of the North Perry Avenue Water District. This change had a minimal effect on the North Perry Avenue water system because the rural area had only a minor influence on the overall demand. Any additional changes between the two district's service areas are not foreseen to happen within the study period.

Page 133, Level of Service, second paragraph – Suggest the following revision to clarify sentence:

This approach does not account for households served by private systems and therefore may result in an under-estimate of actual population located within the district service area (but not an under-estimate of actual population served by the district).



Page 136 –

North Perry's number of existing connections is 6,275 not 7,110. 7,110 is the number of projected connections in Year 2012.



Pages 157 & 159 –

The funding source for the Seismic Upgrade of Olympus 0.3 MG Reservoir is a Hazard Mitigation Grant from FEMA, not DOE.





RECEIVED

SEP 25 2006

KITSAP COUNTY DEPT OF COMMUNITY DEVELOPMENT

September 20, 2006

Kitsap County
Department of Community Development
614 Division Street. MS-36
Port Orchard, WA 98366-4682

Attn: Angie Silva, Planner

RE: Kitsap County Comprehensive Plan update

Dear Ms. Silva:

Puget Sound Energy (PSE) commends Kitsap County on the release of the Comprehensive Plan 10-Year update for public and agency review and comment. We appreciate the countless hours this effort represents and the County's efforts to coordinate with interested parties.

PSE has reviewed the Utility provisions of the document and offers the following comments for Kitsap County's consideration:

1. "Policy UT-8 Coordinate collection, integration and maintenance of Geographic Information System (GIS) utility data among utility providers to ensure consistent and up-to-date information on facility locations and capacities." (New Policy)

Comment:

PSE facility maps are considered part of the critical infrastructure. Access to this information is therefore limited by PSE for security reasons, and PSE is very reluctant to provide this information to anyone who may be required to distribute it to the public. Recently, and in all likelihood in the future, issues associated with homeland security may limit the nature and extent of information that PSE may make available regarding its utility systems, and how and to whom this information is disseminated. For this reason, PSE cannot support this policy.

2. Utilities Appendix, IV. ELECTRICAL, Existing Facilities

"Power is supplied to Western Washington primarily.....The existing electrical facilities inventory in ~~unincorporated~~ Kitsap County consist of:

Comment:

The inventory provided includes all of PSE's Kitsap County facilities, not just those in unincorporated areas.

Please feel free to call me with questions at (360) 394-6618. Thank you for the opportunity to comment and for your consideration.

Sincerely,

Linda E. Streissguth, AICP
Municipal Liaison Manager
Puget Sound Energy

2 cont

2



22884 River Dr. NW
Poulsbo, WA 98370

RECEIVED
SEP 25 2006
KITSAP COUNTY DEPT OF
COMMUNITY DEVELOPMENT

TACOMA - OLYMPIA
WA 983
21 SEP 2006 PM 1 L



Kitsap County
Department of Community Development
614 Division Street, MS-36
Port Orchard, WA 98366-4682

Attn: Angie Silva





THE SUQUAMISH TRIBE
P.O. Box 498 Suquamish, Washington 98392

October 30, 2006

County Commissioners
Kitsap County
614 Division Street, MS-4
Port Orchard, WA 98366

Re: Kitsap County 10 Year Update

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 habitat and natural systems. The Tribe urges Kitsap County to avoid land use decisions that will impact natural resources within the Tribe's U&A. We have reviewed the material provided and have the following comments.

Volume I Draft Comprehensive Plan Policy Document

2.2.3: Reasonable Measures

The Suquamish Tribe supports the county in creating a list of reasonable measures, however, the County must still meet the goals and requirements of RCW 36.70A.215. The number of reasonable measures identified is less important than their effectiveness in increasing densities in urban areas. The measures the county adopts to correct inconsistencies between what was planned and what is occurring on the ground must be reasonably likely to succeed. In addition to a list of reasonable measures there should also be some analysis of the impacts and effectiveness of each measure. Such analysis should occur prior to expending an Urban Growth Area (UGA).

2.2.6: Urban Low Residential

The Tribe does not support the expansion of a UGA in conjunction with the lowering of minimum densities and feels this is a clear violation of the Growth Management Act (GMA). It is recommended that the county maintain the minimum Urban Low Residential at 5 dwelling units per acre.

2.2.8: Urban Industrial and Business Lands

Industrial Multi-Purpose Recreational Area (IMPRA) has been proposed without any supporting information. The need for density increases (additional lands) should be determined using population, employment forecasts and market assessments to identify the need for additional industrial/commercial land uses over time. Kitsap does not yet have a defined need for this designation it is recommended that the county wait until the need arises before proceeding with the rezoning and resulting UGA expansion.

2.2.9: Open Space and Greenways

See comments for Chapter 10.

2.2.10: Historic Preservation

The Tribe is concerned that the County has no policies and procedures relating to inadvertent discovery of cultural resources. The process does not have to be long or particularly detailed. However, it must be in partnership with the Tribe, coroner, and the Washington Department of Archaeology and Historical Preservation (DAHP) and may need to include other entities. Procedures should primarily consist of whom to contact (lead) and outline the procedures that follow.

LU-122: Add Suquamish Tribe.

LU-127: Add Suquamish Tribe

3.2.1: Rural Lands

RL-17: Chico Creek and Gorst Creek should also be included (urban separators). This would be consistent with the GMA requirement for open space corridors within and between UGA's (RCW 36.70A.160). All salmon bearing streams currently with a rural designation should maintain that level of protection.

3.2.3: Limited Areas of More Intensive Rural Development (LAMIRD)

RL-21, RL-22 and RL-27: The County should be cautious with these policies and provide additional clarification and distinction between the types of LAMIRDS. There are 3 types of LAMIRDS authorized by the 1997 amendments. These include 1) existing commercial, industrial, residential or mixed-use areas; 2) intensification or new development of small-scale recreation/tourism uses; and 3) intensification or new development of isolated cottage industry/small scale-businesses. Existing areas must be in existence as of 1990.

RL-29, RL-30 and RL-31: Needs to clarify that LAMIRD's are not to attract growth but to promote infill of existing uses.

3.2.7: Rural Wooded Incentive Program

RL-61: Bullet 12 Add "to promote connectivity" and to avoid checkerboard patterns.

RL-62: Monitoring and evaluation should be added.

RL-63: States that private lands will be permanently preserved for public benefit. We support this policy, however, this is not consistent with Vol. III which states development rights are only retired for 40 years. The 40 year retirement needs to be revised or eliminated.

4.2.3: Surface Water Resources

NS-37: Wetland mitigation banking is more than just identifying sites. This policy does not contain enough detail to make it a viable, successful option. The Clear Creek wetland mitigation banking site is a failure. The current use of the wetland mitigation bank does not seem to be following the sequential steps involved with the creation of mitigation banks. It is the Tribes understanding that prior to credits being sold there should be a comprehensive review of the banking site and a master plan created to maximize the function of the restored/enhanced habitat. Most mitigation bank sites have also had a review team consisting of federal, State, Tribes and local agencies review and approve the master plan to ensure success. The piecemeal fashion in which the Clear Creek (Haselwood) mitigation bank is being managed is apparent through onsite

observations. Many of the enhancement sites primarily consist of dead and dying vegetation. Many of the plant species selected are not planted with any consideration to topography, and water availability. Invasive species (specifically *Spirea douglasii*) have been observed as tagged (planted) species. Maintenance has not been followed through because applicants have already received their permits and their projects have been built.

4.2.5. Plant, Fish and Wildlife Habitat Conservation Areas

The Tribe strongly recommends that Kitsap County incorporate the Local Habitat Assessment completed by the Washington State Department of Fish and Wildlife, adopt the Kitsap Peninsula Salmonid Refugia Study (Kitsap County, 2000) and develop/adopt watershed plans to assist the county in future planning decisions.

9.4.3. Water Quality

SH-6: Either add fecal coliform to this policy or add an additional policy. Fecal coliform is a significant limiting factor that impacts local shellfish harvest areas.

9.4.4. Economic Development

Please note: Commercial harvest of fish and shellfish within Kitsap County are an important part of Tribal culture and economy as well as the county's economy and culture.

9.4.9. Natural Systems

Goal 13 – replace herring and smelt spawning with “forage fish spawning areas” and add “nearshore habitat”.

Chapter 10 Parks, Recreation and Open Space

There was no reference in the materials provided regarding *The County Greenways Plan (June, 1996)* The Kitsap County Greenways Plan committee included County staff and local citizens. The Greenways Plan addressed the following four elements:

- The Kitsap County Bicycle Facilities Plan;
- The Kitsap County Off-Road Trails Plan;
- The Roadside Scenic Resource Corridors Plan; and
- The Wildlife Corridors Plan.

The Plan links recreational trails, commuter bikeways, and heritage and wildlife corridors with parks, schools, places of employment, shopping areas, transit facilities, and a variety of scenic, educational, and interpretive resources, and identifies these corridors as “Greenways.” Greenways will also include other undeveloped scenic and natural resource corridors. Even though this document was completed in 1996 and may have certain areas that need to be updated/ revised to include new information, it is still a valuable comprehensive document that has had a lot of time and effort invested in its creation and it is unfortunate that it has largely been ignored.

Volume II Integrated Comprehensive Plan and Environmental Impact Statement

It is difficult to provide more specific comments regarding a project that has so many unknowns associated with the environmental protection measures. The DEIS asserts that local ordinances, such as the CAO, the SMP, or stormwater regulations will mitigate impacts to natural resources within the subject area. Yet none of these ordinances incorporates a basin-wide approach to mitigating impervious surfaces that Best Available Science (BAS) currently requires. Impacts of the proposed development must be evaluated and mitigated based upon “best available science”. The Washington State Office of Community Development has recently issued a document entitled Citations of Best Available Science for Designating and Protecting Critical Areas. This document contains references to BAS that specifically requires addressing basin-wide impact of

increased impervious surfaces. The watershed approach is the best way to assess cumulative effects on aquatic resources. Therefore, generally we conclude that the DEIS does not sufficiently mitigate the impacts identified and those that are not identified.

Additional reasons for the county to consider a watershed approach is the opportunity to align disparate efforts at the regional scale to correct PS water quality problems (e.g. PS partnership), assure protection of T&E species and consistency with recovery plans for Chinook and Orcas, and for addressing local water quality impairments, many of which are associated with non-point source pollution. Particularly when the county receives non-point funding from the state, their funded efforts should be integrated with TMDL planning.

The Suquamish Tribe is very concerned about stormwater impacts resulting from the proposed increase in impervious surfaces. The loss of permeable surfaces to impervious surface will result in loss of riparian integrity, sedimentation and stormwater impacts. Increased urbanization directly within riparian corridors will result in loss of riparian integrity, sedimentation and stormwater impacts. Stormwater runoff is known to increase the frequency and magnitude of peak flows, reduce base flows, as well as increasing erosion, fine sedimentation, bank instability, and channel incision and scour. Numerous studies have demonstrated that development within a watershed is related to degradation of aquatic habitat and impacts salmonid populations. Salmon and trout habitat is significantly degraded once basin-wide impervious surfaces reach a level of about 10%. Therefore, the County must avoid, reduce and minimize critical area impacts to the greatest extent possible.

1.4. Proposed Action, Alternatives, and Objectives

Table 1.4-1.

Growth Targets – The County should not consider alternatives with “oversized” UGA’s and UGA’s that exceed their population targets. Such alternatives are clearly inconsistent with GMA.

Land Use Map – see previous Vol. I comment regarding reduction of urban low density.

Comprehensive Plan Policies – see previous Vol. I comments regarding urban separators, Greenways Plan, reasonable measures, IMPRA, etc.

Water Resources: Mitigation Measures – What watershed management plans and salmon recovery plans have been officially adopted?

Built Environment: Capability to absorb densities countywide – the UGA’s would have greater capacity if the majority of land was not designated urban low (with an additional proposed reduction in urban low densities). See additional comments regarding urban low density in Vol. I comments.

Cultural Resources: See previous Vol I comment regarding inadvertent discovery.

Stormwater: Mitigation Measures – The use of the word “could” does not offer any assurances that impacts from the proposal actually intend to be mitigated. The Tribe strongly encourages the county to adopt updated stormwater standards. One of the main reasons why the Washington Department of Ecology revised the stormwater manual was that the previous version of the Stormwater Management Manual (published in 1992), used research done in the 1980’s. The updated manual was necessary to include new information and standards that are more protective of the waters in Washington State.

Runoff flow control requirements in the updated manual address the problems of both increased peak flow and the duration of high flows, which are significant problems in urban streams throughout Washington. Higher levels of treatment will be required to remove and reduce pollution from runoff to lakes and smaller streams to provide more assurance that the treated stormwater runoff is not harmful to fish and other aquatic life and is protective of the environment. Some people complain that the Ecology manual is too expensive to implement. However, if one or more onsite conditions are met (limitations on impervious surfaces, retention of native vegetation cover, reduced road widths, smaller footprints, roof runoff infiltration and the use of porous pavers) the developer receives "credit" and the size of the required flow control facility is reduced. It is also recommended that Low Impact Development (LID) practices be included as additional measures that can be implemented to remove and reduce pollution from runoff to wetlands, streams and receiving waters. LID provides more assurance that the treated stormwater runoff is not harmful and reduces impacts on watershed hydrology and aquatic resources. LID includes, but is 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.

23 cont.

2.5.5. Phased Review

Phased review does not mean that cumulative impacts should not be considered at this time. Typically, decisions affecting critical areas are made on a project-by-project, permit-by-permit basis. This often precludes the effective consideration of the cumulative effects of critical area loss and degradation. It also hampers the ability of State, Tribal, regional, and local governments to integrate critical area conservation objectives into the planning, management, and regulatory tools they use to make decisions regarding development and other natural resource issues. This often results in inconsistent and inefficient efforts among agencies at all levels of government. In contrast, advance planning, particularly comprehensive planning conducted on a watershed basis, offers the opportunity to have strong participation by State, Tribal, and local governments and private citizens in designing and implementing solutions to the most pressing environmental problems of that watershed. Advance planning generally involves at least the identification, mapping, and preliminary assessment of critical areas within the planning area. Advance planning may also identify critical areas that merit a higher level of protection and incorporate conservation into land use planning at the local level. Advance planning provides greater predictability and certainty to property owners, developers, project planners, and local governments/agencies/Tribes.

24

Table 2.6-10

It is difficult to assess potential impacts to shorelines prior to Kitsap County adopting an appropriate buffer width for these areas in accordance with the decision of the GMHB.

25

SEPA Categorical Exemptions

The Tribe does not support SEPA exemptions of any size. This eliminates the public process and the Tribes opportunity to comment (especially with regard to cultural resources).

26

Kitsap County Shoreline Master Program

Text should be added regarding upcoming updates to the SMP.

27

3.1.3. Water Resources (Surface and Ground)

Puget Sound Marine Resources and Drainages – Information should be included as to which streams are on the 303(d) list and for what contaminants as well as what some of the existing limiting factors are.

28

Grovers Creek – The last two sentences should read: The Suquamish Tribe operates the Grovers Creek Salmon Hatchery, which serves as a central incubation facility for fall Chinook and chum salmon stocks. Coho salmon, steelhead and cutthroat trout also occur in the Grovers Creek watershed.....

Sinclair Inlet – Nothing is mentioned about Sinclair Inlet being a Superfund site and the high levels of contamination. Also, the Juvenile Salmon Use of Sinclair Inlet, Washington in 2001-2002 (WDFW) has been released in final format. Information from that report should also be included.

Shorelines – The Juvenile Salmon Use of Sinclair Inlet, Washington in 2001-2002 (WDFW) has relevant information regarding the use of shoreline areas by juvenile salmonids that should be included.

3.2.4 Cultural Resources

Historic – Add treaty text:

The 1855 Treaty of Point Elliot outlined articles of agreement between the United States and the Suquamish Tribe. Under the articles of the treaty the Tribe ceded certain areas of its aboriginal lands to the United States and reserved for its use and occupation certain lands, rights and privileges and the United States assumed fiduciary obligations, including, but not limited to, legal and fiscal responsibilities to the Tribe.

29

An aboriginal right retained under the Treaty includes the immemorial custom and practice to hunt, fish, and gather within the usual and accustomed grounds and stations, which was the basis of the Tribe's source of food and culture. Treaty-reserved resources situated on and off the Port Madison Indian Reservation include, but are not limited to, fishery resources situated within the Suquamish Tribe's adjudicated usual and accustomed (U & A) fishing area. The Suquamish Tribe U & A extends well beyond Reservation boundaries. The U & A fishing places of the Suquamish Tribe include marine waters of Puget Sound from the northern tip of Vashor Island to the Fraser River in Canada, including Haro and Rosario Straits, the streams draining into the western side of Puget Sound and also Hood Canal. The U & A of the Suquamish Tribe also extends west into Jefferson County, and south into Mason County. Kitsap County is within the Suquamish Tribe's U & A.

On February 12, 1974, U.S. District Court Judge Boldt ruled that treaty rights entitled Indian Tribes to half of the harvestable fish running in their traditional waters, a right which was later affirmed to include shellfish and other natural resources. The ruling established Washington State's federally recognized Indian Tribes as co-managers (with Washington Department of Fish and Wildlife) of fisheries resources within their usual and accustomed fishing areas.

Preservation and Existing Programs

See comment above in Vol. I regarding inadvertent discovery and comment below regarding Tribal coordination.

30

National Level

Most extant recorded archaeological sites in Kitsap County may be eligible for listing on the National Register of Historic Places, however supporting documentation has not been prepared and submitted to the Keeper of the Register for formal determination and listing. The Washington State Historic Preservation Officer (SHPO) has concurred with recommendations that Old Man House (45KP2) at Suquamish, the Blakely Harbor Site (45KP104), the Carlson Spit Shell Midden (45KP108) on Hood Canal, the Gorst Site (45KP109) at the south end of Sinclair Inlet, the Bay Street Shell Midden (45KP115) in Port Orchard, the Elwood Point Shell Midden (45KP116) in Dyes Inlet, and the Evergreen Park Site (45KP121) in Bremerton are eligible for the National Register of Historic Places, which affords the same consideration and protection as resources that are formally listed on the Register.

Applicable Regulations and Commitments

There needs to be a reference to the Tribe in this section. It does not go far enough to just check with DAHP regarding cultural resources. The Tribe has a significant amount of information that DAHP does not. It is extremely important to coordinate with the Tribe regarding cultural resources.

Volume III Proposed Regulations

Chapter 5 - Rural Wooded Incentive Program

The current language proposed is an excellent starting point and just needs some more detail and further refining in the coming year by the stakeholder group. The Tribe supports the Kitsap County Planning Commission recommendation to postpone any decision on the Rural Wooded Incentive Program. The Tribe shares the Growth Management Hearings Board concerns regarding the potential for rural cluster development to become urban level development.

B.2.b.1. It is stated that the percentage of new development occurring in rural vs. urban will attain "satisfactory progress". More specific language needs to be added that clearly indicates that if the urban/rural allocation goal is not satisfied, no additional land will be made available. In addition, the first release of land should not occur until the 2007 Buildable Lands analysis has been completed.

B.2.b.2. Final approval for 30% of the phase acreage is not enough to monitor, evaluate, and make a determination on the next phase. It is recommended that 60% actually be on the ground for evaluation prior to the release of additional land.

E. The Tribe believes that the wooded reserve set aside period should be no less than 65 years.

E.2.c. There are concerns with this alternative, as it allows for densities greater than 1 dwelling unit per 5 acres.

E.5.3. No minimum lot size is required. This could cause problems in trying to maintain "rural" character of the clusters.

E.7.c. Hazard trees should be determined by a certified arborist.

E.8. Demonstration that wells are utilizing deep aquifers and there is no continuity with surface waters should be mandatory to ensure that stream flows will not be impacted by the proposal.

F.1. The Tribe still maintains that the set aside time for the wooded reserve (currently proposed at 40 years) is not long enough (it is not even one rotation). Currently, stands are typically harvested at an age of 50-60 years. Wooded reserve should not be considered for development for a minimum of 65 years.

F.2. It is recommended that the Forest Management Plan be subject to "approval" by a certified forester or other qualified professional such as the Extension agent. Currently the plan states that the Plan has to be prepared by a certified forester. This may be overly expensive or onerous for some landowners and many landowners are capable of preparing their own plan but are not "certified".

F.3. Text should clearly state that roads in the Passive Open Space tract do not include roads that access development. The area calculation of the roads that cross through the passive open space tract are to be included in the developed % not the open space %.

I. The Tribe does not support vesting. The county has had trouble with this in the past and it is recommended that the language be deleted.

Chapter 6 - Transfer of Development Rights

The Tribe supports and encourages the idea of developing and implementing a Transfer of Development: Rights TDR program.

F.4. Retirement of all transferred development rights on the sending parcels needs to be greater than 40 years. It is recommended that 80 years would be more appropriate however we would prefer they be permanently retired.

Urban Growth Areas

As stated in the October 20, 2006 letter from the Washington State Department of Community Trade and Economic Development (CTED) the Tribe is also concerned that the county maintains a primary method of meeting additional population demands by expanding the UGA's. In addition, many of those expansions consist of very large areas of urban low.

We understand the need to reduce densities in areas that may have critical areas or other constraints but to implement an overall reduction for the urban low designation (from 5-9 units per acre to 4-9 units per acre) does not make sense (i.e. the offset of costs of urban services).

Reasonable measures are not zoning provisions applied to new urban areas intended to concentrate growth and density. GMA requires that Reasonable measures are to be implemented and evaluated for effectiveness prior to deciding to expand the urban growth boundary. Reasonable measures need to be effective tools to promote densities in urban areas and therefore reducing the need for UGA expansions.

The Tribe supports the designation of "Rural Restricted" within UGA's. This will allow for more flexibility and protection for those lands constrained by critical areas. The Tribe does not support the rezoning of Rural Protection to more intensive uses (such as Highway Tourist Commercial or Commercial). These areas were zoned rural protection due to the fact that they were constrained over 50% by critical areas such as wetlands, streams or steep slopes. More intensive development should not be considered on these parcels without a more detailed plan of how to avoid, reduce or mitigate potential impacts.

Central Kitsap UGA

The Tribe supports the inclusion of a non-urban separator in the vicinity of Barker Creek. This supports Countywide Planning Policies and RCW 36.70A.160. Not only will the designation visually and physically define communities but will also protect Tribal treaty resources.

Properties within the UGA not constrained by critical areas or planned green/open space should be developed at urban densities. During permit review activities we have seen plats consisting of densities that are quite low with no rationale such as environmental constraints or natural hazards. Some plats are only about one unit per acre, which is not considered an acceptable urban density pursuant to the GMA. The continued platting at these densities without sewer is considered sprawl and is subject to being challenged.

Kingston

Water availability is a concern. The Tribe did not find detailed information regarding water availability in the materials provided.

Port Orchard UGA

Alternatives 2 and 3 proposed do not follow the GMA requirement of "logical urban boundaries". Islands of rural land surrounded by urban is not considered an acceptable alternative.

Thank you for providing the opportunity for us to comment. If you have questions regarding the comments above please don't hesitate to call 360-394-8447.

Sincerely,
Alison O'Sullivan
Biologist, Fisheries Department

Cc: Tim Gates, CTED
Richard Robohm, WDOE
Jeff Davis, WDFW
Ted Labbe, Pt. Gamble S'Klallam Tribe Natural Resources
Marty Ereth, Skokomish Tribe Natural Resources

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STATE OF WASHINGTON

DEPARTMENT OF COMMUNITY, TRADE AND ECONOMIC DEVELOPMENT
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October 20, 2006

Mr. Eric Baker
Kitsap County Department of Community Development
614 Division Street MS:36
Port Orchard, Washington 98366

RE: Proposed 10-year comprehensive plan update, development regulations amendments, and draft environmental impact statement

Dear Mr. Baker:

Thank you for sending the Washington State Department of Community, Trade and Economic Development (CTED) Kitsap County's proposed 10-year comprehensive plan update, development regulations amendments, and draft environmental impact statement (DEIS) that we received on August 30, 2006. We recognize the substantial investment of time, energy, and resources that these documents represents.

We commend the county for the public process you have followed in developing these documents. Given the relatively short timeline and the amount of work involved, you have provided significant opportunities for public involvement and it is clear the county has attempted to respond to concerns raised by the public as you narrowed down alternatives leading to this draft. We offer the following observations and suggestions for your consideration as you develop a final EIS, comprehensive plan amendments, and development regulations. Our comments are primarily related to Alternative 2, as Alternative 1 does not address the basic requirement of the 10-year update, and Alternative 3 is not supported by necessary comprehensive plan changes.

Overall comments

Overall, the presentation of the comprehensive plan is significantly improved. We appreciate the quality of the writing, maps and overall presentation, including:

- Notably improved organization with consistent formatting.
- The addition of goals that provides greater clarity and structure to the policies.
- Shorter, more declarative policies written in the active voice are easier to understand and reference.
- Summary of each chapter's relationship to the overall vision helps to unite the document.
- Given the scope of proposed amendments and restructuring of the existing plan, it was helpful to include consistent notations of which policies are new and which are modified from previous policies. It was also useful to include tables summarizing dropped policies at the end of each chapter.

We appreciate the direction of many of the county's proposals in Alternative 2 to adopt reasonable measures, including encouraging redevelopment within existing UGAs and adopting a TDR program. We remain concerned that the primary method of meeting new populations targets is through significant UGA expansions. Alternative 2 would expand UGAs by 35 percent, a total of 13.4 square miles. Almost 80 percent of the total

Mr. Eric Baker
October 20, 2006
Page 2

new area would be designated Urban Low Residential, at even lower minimum densities than currently authorized. The cumulative effect of such significant expansion will likely make it harder in the long run to achieve the county's vision and Comprehensive Plan Goals aimed at compact, efficient urban form distinct from a rural development pattern.

Specific comments

Reasonable Measures

Policies LU-8 – LU-11 establish direction for implementing "reasonable measures" consistent with RCW 36.70A.215 and County-wide planning policies. Note that Policy LU-31 (previously LU-4) describes a monitoring and evaluation effort that seems to describe the "buildable lands" program described under current proposed policies LU-8 – LU-11. It may be worthwhile to cross-reference Goal 3, and use consistent terminology in describing the review and evaluation program.

We address many of the specific proposed reasonable measures that are summarized in Vol. I, page 2-13 in our comments below.

Encouraging focused urban growth patterns within UGAs

As the plan notes, one of the county's key issues is an existing pattern of low-density single-family development throughout the unincorporated county, including rural areas. Policies LU-20 – LU 23 are clear statements of the county's overall aim to encourage a more efficient, compact urban form within UGAs that is distinct from rural areas through infill, improved pedestrian connectivity, and mixed-use development on major transportation corridors.

Population allocation banking and UGA association

Policy LU-13 is described in the DEIS as "population allocation banking." The opening sentence is somewhat confusing, but if we are reading it correctly, it provides a reasonable direction for reallocating population targets, for example, from the Central Kitsap UGAs to either Bremerton or the Silverdale UGA. We also support policies LU-28 – 29, LU 37-41 aimed at heightened intergovernmental cooperation and coordination consistent with County-wide Planning Policies, and the explicit direction in LU-26 to address association of all unincorporated UGAs with corresponding cities by 2008.

Consolidating land use map categories

Policy LU-36 and associated regulatory changes consolidate land use categories and authorize site-specific rezones within broader plan designations outside the annual comprehensive plan update process, similar to many other communities in Washington. This policy change, together with proposed TDR regulations that require site-specific rezones to purchase development rights from rural areas, could be an important measure to help the county meet the comprehensive plan vision to redirect growth to urban areas.

Policies requiring urban-level sewage treatment

We support policy LU-14 requiring urban-level sewer service in all UGAs. Policies LU-15 and LU-16 provide direction for use of alternative sewage treatment. This seems appropriate given the county's terrain, which makes conventional sewage treatment infeasible in some areas.

Minimum density requirements

We strongly support Policy LU-42 to require new residential development in UGAs to achieve minimum densities. This is a reasonable measure that other jurisdictions have demonstrated is very effective. We note the policy allows for exceptions where lower densities are appropriate to protect critical areas. We assume this is

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implemented through calculation of density by net developable acreage, which extracts critical areas from the gross acreage (KCC 17.382.020.A).

Reducing minimum densities in Urban Low / Urban Cluster Residential zones

The county proposes to reduce minimum densities required in Urban Low (UL) and Urban Cluster (UC) Residential zones from five dwelling units/acre (du/ac) to four du/ac. We recommend the county maintain the minimum density of five du/acre for the following reasons:

- Reducing minimum densities seems inconsistent with the overall vision of the comprehensive plan, captured concisely in Policy LU-20, to “encourage compact development patterns, allowing for efficiencies in transportation and utilities.”
- Higher densities of development help to reduce the per-unit cost of providing urban services such as water, sewer, roads, and emergency services, and provide opportunities for more affordable housing. Although there are no bright lines defining urban densities, the CPSGMHB in *Bremerton, et. al v. Kitsap* emphasized that 4 du/ac is the low end below which provision of urban services is inefficient and unaffordable. We note also that planning literature points to thresholds of seven du/ac or more to sustain viable transit service.
- As noted in the DEIS, reducing the allowed minimum density reduces the development capacity of UGAs, which forces the county to designate larger UGAs than would be needed with the current density range (DEIS, p. 3.2-87). This is a significant concern because the Land Capacity Analysis uses minimum densities to calculate land supply, and Urban Low is the predominant residential zone in all UGAs.
- The DEIS notes that reducing the allowed density range would somewhat offset the upzones and densification overall, and notes that the reduction would have a pronounced effect in ULID #6 UGA (DEIS, p. 3.2-43).
- We note that Appendix H of the DEIS (Table 1) shows that from 2000 - 2005, achieved urban densities in final long plats has averaged 5.6 du/ac in the Urban Low Zone countywide. This seems like a trend the county would want to encourage.
- The existing five du/ac minimum density is more consistent with existing Low Density Residential zones in the cities of Bremerton and Port Orchard.

Amending the maximum allowed density in the *Urban Restricted* (UR) zone from 1-5 du/ac to 1-4 du/ac does not seem as problematic because it does not reduce the minimum density that is the basis for the land capacity analysis, and these lands are presumably already constrained by critical areas.

Updates to Urban and Medium High Residential zones

We support Goal 12 to provide a variety of housing types within UGAs, and accompanying policies and regulations that increase allowed structure heights and maximum densities allowed in Urban Medium and High Residential zones. Policies LU-50 – LU-53 are necessary companion to these goals and policies, as community support for higher densities will falter without good design.

The DEIS notes that there are differences between Bremerton’s plan and certain proposed high density zones in the Central Kitsap, and East Bremerton, West Bremerton, and SKIA UGAs. We are aware of the city’s concentrated effort over the past few years to focus all multifamily development around specifically identified mixed use centers. The DEIS states that “there are some areas where greater density is proposed along major roadways in nodes *apart from commercial areas where services are available* (DEIS, 3.2-94).” The county should ensure that zoning in these UGAs establish a pattern of development that is consistent with the city’s vision of growth.

New Mixed Use zone

We support policies LU-64 – LU-68 and LU-76 – LU-77 creating a new Mixed Use zone, and the new Chapter 17.352. We encourage the county to coordinate closely with Bremerton in implementing Policy LU-73 that

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directs location of the new mixed use zones in Central Kitsap, East Bremerton and West Bremerton UGAs, to ensure compatibility with city plans, as noted above.

Expansion of Highway-Oriented Commercial

Policy LU-74 directing expansion of highway-oriented commercial development may potentially conflict with Policy LU-81 and LU-82 to minimize strip development along major roads or minor arterials.

Industrial Multi-Purpose Recreational Area (IMPRA)

Policies LU-105 – LU-108 designating the new IMPRA and “urban holding area,” are designed to give the county the ability to keep options open for the possibility of a proposed NASCAR facility or other such development. Although the potential for such a significant expansion of new industrial zoned land raises significant Growth Management concerns about provision of urban services and transportation the county has taken a cautious approach in setting requirements for a master plan, a full EIS and capital facilities planning.

Low Impact Development (LID)

We support new policies LU-132 and LU-157 to consider cumulative impacts in planning efforts, and policies LU-158, LU-160 – LU-164 setting direction for low impact development standards and a monitoring program. We applaud the county’s commitment to adopting LID standards as a high priority item in Chapter 18 (Implementation). We understand the county has already made some progress towards this goal through a Puget Sound Action Team grant. Consult with Department of Ecology about possible state funding to continue this work (<http://www.ecy.wa.gov/programs/wq/funding/NewLowImpactProgram.htm>).

Transfer of Development Rights

We strongly support new policies directing a Transfer of Development Rights program as a reasonable measure, consistent with Countywide Planning Policy CW-3(d). We have not conducted a detailed evaluation of proposed TDR regulations. If you have not already, we suggest you gather peer review comments from other jurisdictions and organizations such as the Cascade Land Conservancy with experience in implementing TDR codes in Washington. We would be happy to facilitate such review at your request.

Pre-planning

We support removal of the pre-planning option that the county has used within UGAs as well as Urban Reserve areas (Vol. III, p. 3.2, KCC 17.315.080 and .090). Other jurisdictions have encountered the same problem the county has identified - development that essentially precludes future development regardless of the design of the pre-plan.

Urban Restricted (UR) zone

The UR zone has been amended so that densities will be “based on net acreage of the property(s) after removal of all critical areas and their buffers.” KCC 17.382.110.A.18. This seems reasonable, if as stated in Chapter 3, experience showed that basing the high end of the range on gross acreage was creating inconsistencies between development and the intent of the zone to protect the environment (Vol. III, p. 3-2).

The UR zone provides a new exception to minimum density requirements where (a) reduced density will provide greater protection for critical areas, and (b) the intent of the subdivision is to keep property in ownership of immediate family members (KCC 17.382.110.3). It is not clear that Subsection (3)(a) is necessary as density is based on net acreage, so critical areas and their buffers will already be subtracted. The exception in (3)(b), the crux of the amendment, might be difficult to administer, and it forces county staff to judge the nature of the applicant, rather than the application – something that you generally want to avoid.

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Rural Wooded Incentive Program

The Rural Wooded Incentive Program would increase rural densities somewhat in exchange for greater long-term open space protection. As the DEIS notes, it could "increase the potential for localized compatibility impacts where clustered residences are developed adjacent to lower density uses (DEIS, p. 3.2-57)." This might be especially significant at the higher end of the incentive scale, where density of clusters could be up to 1 du/5 ac, in clusters of up to 25 residences. We share the concern raised by the Board in *Bremerton II* that at some point rural development under cluster provisions can cross the line from rural character into urban-level development. The county has made a significant attempt to address *areawide concerns* by phasing release of lands and through a monitoring program including a detailed biennial evaluation with criteria that must be met before releasing the next phase. The county has addressed *design concerns* through development standards such as 100-foot vegetated buffers from roads, and buffers between clustered residential uses and adjacent uses. Yet the county still has a difficult policy choice to make with this program, because if the program is successful in providing more permanent open space protection, it would at the same time "continue the trend of an attractive rural area and make it more difficult to attract urban growth to UGAs (DEIS, p. 3.2-95)."

Area-wide Rezones

We appreciate that the county is proposing to densify within existing UGAs and adopted other reasonable measures, including a TDR program, but remain concerned that the primary method of meeting new population targets is through significant UGA expansions. Alternative 2 would expand UGAs by 35 percent, a total of 13.4 square miles. Almost 80 percent of the total new area would be designated Urban Low Residential, at even lower minimum densities than currently authorized. The cumulative effect of the expansion will likely make it harder in the long run to achieve the county's vision and Comprehensive Plan Goals of a more compact efficient land use pattern. The county may consider addressing the 10-year requirement to provide for population allocation through a phased approach that gives reasonable measures more time to work.

Kingston UGA: As we commented in our previous review of the Kingston subarea plan, expansion of the UGA to include the "Arborwood" Planned Unit Development at urban densities and with improved protection of critical areas seems to us a pragmatic alternative to permitting the vested application at sprawl densities of 1 du/acre.

Silverdale UGA: We strongly support the subarea plan focus on transforming the downtown core, e.g., through the new mixed-use zone, regulatory incentives for height and density increases, the proposed SEPA exemption for infill, and excellent Downtown Design Guidelines. We also support CP Policy RL-17 and proposed re-designation to exclude the environmentally-sensitive Barker Creek corridor from the Silverdale UGA. This is consistent with the often-unacknowledged requirement in GMA for identification of open space corridors "within and *between* Urban Growth Areas" in RCW 36.70A.160. We urge you to carefully review Urban Low and Urban Restricted designations that surround the existing Silverdale UGA core. Larger extents of UR zoning, especially at the UGA fringe, raise concerns about the appropriateness of this designation. The DEIS notes concerns about conversion to urban uses in the Western portion of the UGA, including the presence of a fault line and high geologic hazard, as well as areas identified as priority conservation areas and salmon refugia by several different organizations (DEIS, p. 3.1-99 and Appx. N, figures 16 - 23).


Central Kitsap, East Bremerton, West Bremerton: As described above, we believe it is important that all proposed zoning amendments in areas to be associated with Bremerton are consistent with city recommendations to prevent zoning that conflicts with the city's vision.

Port Orchard/South Kitsap UGA: The Port Orchard Subarea Plan includes laudable land use goals and policies that establish a direction towards a compact, human-scale land use pattern and promote multimodal transit and development of intensive mixed-use commercial centers. However, we remain

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concerned about expansion of vast tracts of Urban Low Residential, and significant extension of Highway Tourist Commercial zoning outside the existing UGA. The pattern of development in the expanded areas may conflict with subarea plan goals and further cement the bedroom nature of the community. We described these concerns in greater detail in our comment letter on the subarea plan dates February 2005 (*attached*).

Again, we appreciate the hard work, analysis, and extensive public process that went into creating the draft comprehensive plan, regulations and DEIS. If you have any questions or concerns about our comments or any other growth management issues, please call me at (360) 725-3058.

Sincerely,

Tim Gates
Senior Planner
Growth Management Services

TG:lw

cc: David Gretham, SEPA Coordinator
Leonard Bauer, AICP, Managing Director, Growth Management Services, CTED
David Andersen, AICP, Plan Review and Technical Assistance Manager, Growth Management Services, CTED

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STATE OF WASHINGTON

DEPARTMENT OF COMMUNITY, TRADE AND ECONOMIC DEVELOPMENT
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February 22, 2006

Mr. James Weaver
Planner III
Kitsap County Department of Community Development
614 Division Street
MS:36
Port Orchard, Washington 98366

RE: Proposed Port Orchard/South Kitsap subarea plan and draft environmental impact statement

Dear Mr. Weaver:

Thank you for sending the Washington State Department of Community, Trade and Economic Development (CTED) the proposed Port Orchard/South Kitsap subarea plan and draft environmental impact statement (DEIS) that we received on December 27, 2005. We recognize the substantial investment of time, energy, and resources that this document represents.

The final subarea plan will shape the county's urban growth area (UGA) as development and redevelopment occurs. We especially like the following:

- Land use goals and policies establish a clear direction towards a compact, human-scale land use pattern. The policies promote multimodal transit and development of intensive mixed-use commercial "Centers," while preserving open space.
- The county's proposal to implement a transfer of development rights (TDR) program is timely. We appreciate that instituting a TDR program will not be easy, but it could be an important component of the county's overall effort to increase density in UGAs while preserving the existing rural character in the rural parts of Kitsap County.
- Housing goals and policies provide further definition to the Centers concept, emphasize the importance of urban design, and address other important goals such as affordable housing.
- The Environmental Protection Element includes a comprehensive series of goals and specific policies for protecting critical areas and air quality.
- The Transportation Element includes goals aimed at reducing auto-dependency through increasing transit service, improving bike and pedestrian access, and developing a transit oriented development (TOD) program.

- The Capital Facilities Element requires collaboration with the full range of urban service providers, including fire, water, and school districts. The stormwater facilities goal is supported by specific polices to limit impacts of impervious surfaces including development of low impact development strategies.
- The Economic Development Element includes goals and policies directed at reversing the bedroom community nature of the community and sets an employment target of one new living wage job per new household. The plan identifies five catalyst projects, including more detailed guidance on implementation of TOD pilot projects.

We would also like to offer the following comments and suggestions. We encourage you to consider the following as you develop a final EIS and subarea plan:

Our central recommendation is to encourage the county to adopt a final subarea plan that accommodates the allocated 2025 population within or as close as possible to the existing UGA boundary.

All of the action alternatives rely primarily on increasing the amount of developable land through expansion of the UGA. We appreciate the reasons that the county has taken this approach. As the plan states, it is not easy in Kitsap County to concentrate growth in cities and UGAs. County-wide planning policies allocate 76 percent of future growth to cities and UGAs. A large supply of small vacant lots in surrounding rural areas make this goal hard to achieve. In the Port Orchard UGA, the report states that "achieved densities within the major residential designations are below densities outlined in the comprehensive plan and zoning ordinance" (p. 3-6). The Development and Population Allocation Report (January 2005) states that 66 percent of growth in South Kitsap between 1990 and 2000 was outside existing UGAs, and the rate is even higher from 2000 to 2002. We interpret the county's proposals to expand the UGA into areas already designated urban reserve now as an attempt to help spare the rest of the surrounding countryside from such rapid conversion.

However, there are many good reasons to use the subarea planning process to focus population growth and business expansion within the existing UGA boundary or perhaps within focused expansion areas.

Consistency with subarea plans and goals

The subarea plan includes excellent goals, policies, and specific strategies for encouraging a compact urban form that will improve the livability of the subarea, as noted above. Zoning changes within the existing UGA, together with the adoption of other reasonable measures identified by the Citizen Advisory Group, could achieve significant increases in density that would further these goals and policies. By contrast, the pattern of development in the expanded areas may conflict with these goals.

- In all action alternatives, 60 to 70 percent of the area proposed for expansion is Residential Urban Low designation, at least doubling existing acreage over Alternative 1 (p.6-18). This proposed pattern of development appears to conflict with many subarea plan goals, including: Goal LU-3 to promote a compact land use pattern; Goal LU-4 to encourage land use patterns that promote convenient multimodal access and reduce auto dependency; and Goal H-2 to promote a variety of housing types. The pattern of expansion of residential low may serve to cement rather than reverse the community's traditional bedroom community direction.
- Chapter 6 of the DEIS demonstrates clearly that, as *currently designated*, the capacity of developable lands both within the city and in the existing UGA cannot accommodate the new population allocations. However, Alternative 4 includes significant changes to zoning *within* the existing UGA that appear to support the central thrust of proposed subarea plan goals and policies, while significantly expanding residential capacity. For example:

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- The *Mile Hill Drive Corridor* is identified as a TOD catalyst project that will promote the plan's attempt at "place-making" through mixed-use centers (p 3-47). Alternative 4 would convert this corridor to mixed-use Neighborhood Commercial, expand Urban High Residential zoning adjacent to the existing Urban Village Center to the South, and expand Urban Medium Residential zoning to the West. The area is immediately adjacent to the city, includes schools, significant park amenities, and is ringed with existing Low Density development.
- *Bethel Road* within the existing UGA is the other area identified as an opportunity for TOD. Alternative 4 would expand areas zoned mixed use Highway Tourist Commercial, and increase Urban Medium and Urban High Residential zoning. The subarea plan also provides direction to complete and expedite the Bethel Road Corridor Development Plan, which would support the transition of this area to a more people-friendly space.
- Alternatives 2 and 3 do not include any expansion of area designated Urban High and Urban Medium Residential within the existing or expanded area. The county's Development and Population Allocation Report projects that "the portion of the housing that will be multifamily is projected to increase to 15.5 percent by 2010 in the South Kitsap area." The lack of new areas designated High and Medium appears to conflict with Goal H-1 to encourage affordable housing, as well as Goal H-2 to promote a variety of housing types throughout the subarea, and supporting policies to develop tiers of allowable residential densities radiating out from neighborhood centers. The plan states that "a greater variety of housing types can be built under medium and high density residential land use designations..." so "designating an adequate supply of land to these use categories will therefore facilitate development of greater housing opportunities to meet the needs of various segments of the population." Only Alternative 4 expands these designations within the existing UGA.

Attracting desired economic development

Besides accommodating a significant new population allocation, the other major driver behind proposed expansion of the UGA is a projected shortfall in commercial/business park lands needed to meet the expanding community's needs and recapture leakage to other regional shopping centers.

The plan sets an employment target of 3,884 new jobs, and builds on the Population and Development Allocation Report projections and the Updated Land Capacity Analysis to calculate a net acreage of 207 net commercial acres and 152 net industrial or business park acres to balance the jobs-to-housing ratio, reduce dependence on federal employment and commuting. However, the report acknowledges that "these figures may be altered further by use and analysis of application of reasonable measures in providing incentives for more intense commercial and industrial development patterns and co-location of employment with residential in mixed-use developments (p. 3-65)."

Alternatives 2 and 3 provide this supply primarily by expanding Highway Commercial zoning on Bethel south to Highway 16 as well as an expanded area west of the Highway. This appears to further the auto-oriented direction of the area and may conflict with policies such as ED-5.3 to discourage strip commercial development patterns. We note that the Transportation and Economic Development elements emphasize the importance of implementing the Bethel Road Corridor Development Plan. This detailed plan only covers the corridor within the existing UGA.

We note that the plan emphasizes the need to plan for adequate increase in lands designated for broadly defined office-using sectors, but doesn't clearly target specific sectors. In several places the plan calls for a more specific strategy. For example, Policy ED-2 calls for an economic market analysis and a strategy to support the needs of employers. The section on TOD suggests that implementation could begin with a regional market analysis for potential development, followed by a collaboratively developed Corridor Market Analysis on Bethel

Road or Mile Hill Drive (p. 3-65). The county should be able to attract more of the kinds of primary employment that are desired through a careful analysis of market demand and development of high intensity mixed use, TOD projects.

Environmental impacts

The report identifies significant environmental impacts to proposed expansion areas, including:

- Impacts on hydrology and ecology through expansion of impervious surfaces in sensitive basins, particularly Burley and Sacco basins that currently have low percentages of impervious surface (p. 5-28, Fig. 5.3-6).
- Wetlands and groundwater concerns with proposed expansion of Highway Tourist Commercial in the Blackjack Creek Basin (p. 5-29, 31); and
- Proposed expansion of industrial zoning within a wellhead protection zone that may preclude industrial activities (p. 5-31).
- The air quality section notes the increase in Total Vehicle Miles Traveled with expansion of Low Density Residential zoning and points to research showing beneficial impacts of "smart growth" alternative land use strategies (p. 6-65).
- Also, see comments on impacts to natural resources raised by Washington State Department of Fish and Wildlife in their letter of January 19, 2006.

These impacts are an unavoidable consequence of converting existing rural lands into urban development. This is one reason why we encourage you to choose a final alternative that minimizes the amount of land brought into the UGA. The lower the amount of UGA expansion, especially expansion into predominantly rural basins, the lower will be the environmental impact.

Capital facilities

The report identifies significant infrastructure and service challenges to expansion of the UGA, including:

- Expanded or replaced sewer infrastructure. The plan states that existing treatment facilities have adequate capacity, but the most significant cost of sewage treatment is conveyance, which will be covered by connection fees and facility construction fees (p. 6-152). We note that the Updated Land Capacity Analysis (ULCA) includes a reduction factor for sewer availability. If we are reading the ULCA correctly, a significant number of acres within the existing Port Orchard UGA are identified as sewer-constrained. If this is true, will it be even more so for the expanded UGA area? It seems this would make it very difficult to achieve utility concurrency.

We note that the Citizen Advisory Group recommended as a Reasonable Measure updating the capital facilities plan for sewers "such that plans and finances for an extension of the sewer lines would cover those remaining parcels that are inside the UGA, but not yet served" (Appendix B, Section 1.1.4.1, p. 7). Establishing a plan to serve existing areas identified as sewer constrained could significantly expand the capacity of your existing UGA, helping to reverse the trend of excessive growth in rural areas.

- Pedestrian and bicycle improvements. The DEIS states that the existing UGA "currently has an incomplete network of pedestrian and bicycle facilities with the majority of sidewalks constructed on major streets and large areas retaining the existing rural level of facilities."

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- Parks. The DEIS notes that the most significant areas proposed for expansion (development west of Highway 16 and south of Sedgewick) "will require additional local neighborhood parks facilities since currently no facilities exist in these areas."
- Water distribution. The report identifies need for development of new water storage and distribution systems in undeveloped portions of the subarea (p. 6-139). Per capita usage is lower and delivery is far more efficient in more compact concentrated growth patterns.

The larger the UGA, the greater the financial costs, not only to build them, but also to maintain them. The needs in these new urban areas will compete with the need to maintain the infrastructure in the existing urban areas. This is another reason why the county's long-term financial sustainability is best served with a more compact development pattern.

Other planning efforts

The county is currently conducting a ten-year review of UGAs, and preparing to write a Buildable Lands report. These efforts will give the county a broader base of information on how planned densities are being achieved throughout the county, and will give the county the opportunity to further refine and adopt reasonable measures, other than adjusting UGAs, that will be taken to comply with the GMA requirement to plan for population growth.

Again, we appreciate the hard work and careful analysis that went into creating the draft subarea plan and DEIS. If you have any questions or concerns about our comments or any other growth management issues, please call me at (360) 725-3058.

Sincerely,



Tim Gates
Senior Planner
Growth Management Services

TG:lw

cc: David Greetham, SEPA Coordinator
Leonard Bauer, AICP, Managing Director, Growth Management Services, CTED
David Andersen, AICP, Plan Review and Technical Assistance Manager, Growth Management Services, CTED

Untitled

From: Gates, Tim (CTED) [mailto:TimG@CTED.WA.GOV]
Sent: Friday, October 20, 2006 5:15 PM
To: Eric Baker (E-mail); Jim Bolger (E-mail); Angie Silva (E-mail)
Cc: Bauer, Leonard (CTED); Andersen, David (CTED)
Subject: Formal CTED letter on 10-year update

Attached please find CTEDs formal letter on Kitsap County's proposed amendments related to the 10-year update, for inclusion in your record before the Board of County Commissioners.

<<10759_Comment Letter.pdf>>

We greatly appreciate the efforts you have made to seek CTEDs input throughout the update process, and thank you for sharing the attached letter in draft form with the Planning Commission for their consideration. We recognize that the Planning Commission has addressed some of our concerns, e.g., through the addition of new Mixed Use designation and changes to Highway Tourist Commercial designations to improve consistency with plan goals, and changes made to improve consistency with Bremerton plans. We would like to add into the record a few comments on proposed changes recommended by the Planning Commission.

Shoreline Policy Changes

We concur with staff recommendation to the Board of Commissioners to defer amendments to the Shorelines Chapter. Changes to this Chapter will require changes to the SMP, a process we do not recommend commencing at this time in this fashion.

Transfer of Development Rights (TDR) Changes

We understand the county's interest in adopting a streamlined TDR program that gets some success on the ground, and are attempting to craft a code that takes away some of the common disincentives to TDR transactions.

The Planning Commission and Staff recommend changes to the draft TDR program that would allow rural properties to recapture their sold development right if purchased from another rural property, provided that purchase would not increase their density beyond that allowed by their zone. We assume this provision is added to take away fears that accompany making a permanent decision, as most TDR programs are established to transfer property rights "in perpetuity." This seems like a reasonable way to test-run your TDR program and try to build some successes. This option eases fears that owners of sending parcels often have about making an irreversible decision, while maintaining the net effect of transferring density from the rural area to the urban area. It seems to us that, though this provision may lead to some complex transactions, it would achieve its objective as a "reasonable measure."

There are two other "incentives" to transfer development rights built into the code in addition to this one:

The original TDR proposal was for the sending parcels to include transfer of the development rights for a period of 40 years, after which the development right would "come back to life." KCC 17.430.090.F(4)
The Planning Commission recommendation is to "include language stating if property that has sold a development right is included in a UGA through a Comprehensive or Sub-Area planning effort, the development right will be restored for urban development."

We recommend removing these two provisions as they do not actually lead to net transfer of development from the rural to the urban area. We also anticipate that they will create significant administrative challenges for the county and property owners.

Untitled

Thank you again for all your hard work. As always, we extend our continued support to Kitsap County in achieving the goals of growth management. If you have any questions or concerns, please call me at (360) 725-3058.

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Tim Gates
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State of Washington

Department of Fish and Wildlife

Mailing Address: 502 High Ave. Suite 112, Port Orchard WA 98366, (360) 895-3965, Fax (360) 876-1894

October 30, 2006

Kitsap County Department of Community Development
Eric Baker
614 Division Street, MS-36
Port Orchard, Washington 98366

Dear Mr. Baker:

SUBJECT: Review and Comments on the Kitsap County 10-year Comprehensive Plan Update, Development Regulations, and Draft Environmental Impact Statement.

The Washington Department of Fish and Wildlife (WDFW) has reviewed the 10-year Comprehensive Plan Update, the associated development regulations and environmental impact statement documents, and has the following comments.

WDFW is pleased with the organizational improvements that have been made to the existing comprehensive plan. We are also encouraged by many of the goals and policies expressed in the Comprehensive Plan, and impressed by the intergovernmental coordination efforts that are referenced throughout these documents, especially within the "Rural Wooded Program" section and the "Plants and Animals" chapter.

WDFW offers the following comments on specific goals, policies, and regulations:

3.2.1 Rural Lands Goal 4. Preserving existing open space in rural areas and promote opportunities for provision of new open space in rural areas. WDFW is encouraged by this goal and offers technical assistance regarding fish and wildlife resources that will aid the county in achieving this goal. WDFW is particularly pleased by Policies RL-15 through RL-17, as these policies encourage the preservation of open space and extremely important "edge" habitats for wildlife through the protection of forestry and agricultural lands. WDFW supports the implementation of these policies through incentives such as "transfer of development rights" (TDR's), conservation easements, clustering incentives, and "purchase of development rights" (PDR's).

3.2.3 Limited Areas of More Intensive Rural Development Goal 6. Allow for the designation of LAMIRD's outside of the UGA based on existing rural residential communities or villages, areas of mixed use activity, isolated areas of small-scale commercial/industrial activity, and historic towns. WDFW encourages the county to limit the establishment of new LAMIRD's to avoid to

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future urban expansions that would impact fish and wildlife habitat areas. Care should be taken to maintain open space corridors between LAMIRD's and nearby UGA's to protect inter-connected habitat corridors and avoid fragmentation of large blocks of intact habitats. Future urban growth should instead be focused in existing UGA's and/or existing LAMIRD's to minimize impacts to fish and wildlife habitats in rural areas. Additionally, WDFW recommends encouraging shoreline restoration during the re-development of the Port Gamble Rural Historical LAMIRD (Policy RL-32).

3.2.4 Resource Lands and 3.2.6 Agricultural Lands Goals 7, 8, 9, 10 and 13. Preserve and enhance natural resource-based activities, such as agriculture and forestry in the rural areas through regulatory and non-regulatory means. These goals are extremely important to the long-term preservation of fish and wildlife species diversity within Kitsap County. Many of our fish and wildlife resources depend heavily on forestry and agricultural areas and can co-exist with these land uses. Protection of these areas can also reduce impacts to fish and wildlife habitats adjacent to these land uses. Maintaining forestry and agriculture on the landscape, if done in accordance with the law and with the use of "best management practices" (BMP's), can also reduce stormwater runoff, thus reducing impacts to instream fish habitat while also reducing our reliance on engineered stormwater systems on a watershed scale.

3.2.7 Rural Wooded Policies Goal 14. Preserve the resource value of rural wooded areas while accommodating other limited, complementary uses. It appears that this goal is being established to support the Rural Wooded Program (RWP) that is a method of compensating forest landowners for the 1998 downzoning of their properties. While this program has many merits, WDFW suggests that long-term benefits to fish and wildlife resources will best occur if the natural open space tracts are coordinated and connected between adjacent properties. These open space tracts will be most effective if protected in a pattern that encourages large intact wildlife habitats with inter-connected corridors. A lack of connectivity can lead to the creation of habitat "islands" that can easily become degraded habitat.

WDFW is concerned that the RWP could increase development densities in the rural areas and thus be counter to Comprehensive Plan goals to improve the urban/rural growth split. WDFW is also concerned with the proposed 5-year vesting extension that may be granted. Best available science (BAS)-supported ordinances should be applied after the initial 5-year vesting period expires to ensure adequate protection of critical areas.

3.2.8 Transfer of Development Rights Goal 15. Promote the TDR from land valuable to the public, especially rural and resource areas, to urban areas, in order to preserve the rural environment, encourage retention of rural resource-based uses, and avoid urban service demands in the rural area. WDFW is very encouraged by the development of this TDR program. WDFW supports the use of TDR to achieve permanent fish and wildlife habitat protection while focusing new growth in compact urban areas. Policy RL-63 discusses the goal of permanently preserving private land with countywide public benefit. However, upon review of the TDR regulations (Chapter 6), the TDR program only waives the development rights for a

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period of 40 years. WDFW encourages extinguishing the development rights in perpetuity, or at a minimum increasing the time period beyond 40 years.

Page 2-26 of the DEIS describes the TDR program envisioned in Alternative 2 (and 3). WDFW supports the use of TDRs following this description, and is impressed with the innovative approaches in the proposal for requiring the use of TDRs for "upzoning" and allowing use in commercial properties. However, the description of TDRs in the DEIS does not include an evaluation of the potential impacts associated with placing a time limit to the deed restriction placed on the sending area parcel. Under Section 17.430.090 (F), deed restrictions may be limited to 40 years.

WDFW has serious concerns about the impermanence of this protection. According to Section 17.430.010, one of the purposes of the program is "to help preserve critical areas, watersheds, and open space...". By limiting the effective time period of the deed restriction, the County is not achieving this preservation, nor the County's proposed policies for protection against fragmentation of habitat areas as expressed in Chapter 4, Natural Systems. This TDR system may only delay the ultimate fragmentation of important habitat by a certain time period.

One alternative could be to restrict the 40-year expiration period only to those rights not associated with critical areas, including fish and wildlife habitat conservation areas. If the issue is finding incentives for property owners to take advantage of the TDR program, incentives other than a 40-year limit could be considered, including providing "bonus" development rights to some sending area parcels (e.g., not basing the number of transferable rights by the zoned density, but on a different calculation that would allow more rights to be transferred than could be sited on the rural property) or by allowing the entire acreage, including areas under conservation easement or otherwise encumbered, to be used in the calculation of transferable development rights.

WDFW might also consider supporting a proposal that allows reconsideration of a deed restriction after 40 years, but subject to very specific criteria (e.g., the parcel is completely surrounded by urban development and/or no longer meets the definition of a critical area or provides habitat value as documented by WDFW). WDFW hopes that changes can be made to the proposed TDR program to better achieve permanent protection on sending area parcels.

4.2.5 Plant, Fish and Wildlife Habitat Conservation Areas, Goal 11. Preserve the biological diversity of Kitsap County and Puget Sound by appropriately regulating terrestrial and aquatic habitat areas. WDFW encourages the county to integrate into Policy NS-46 the Local Habitat Assessment completed for Kitsap County by our agency. This will help direct the county's decisions on maximizing open space connectivity in a meaningful manner that will promote long-term protection of fish and wildlife habitats. We are also encouraged with the coordination between local jurisdictions, agencies, tribes, and landowners in habitat assessments and planning efforts, minimizing habitat fragmentation, and protecting habitat areas and corridors as described in Policies NS-49, NS-50, and NS-51.

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Policy NS-56 discusses the need to encourage clustered development and coordination between neighboring properties to promote maximum habitat protection. If designed carefully, clustered development can be a positive alternative for fish and wildlife compared with conventional subdivision design. Through clustering, is very important to minimize infrastructure impacts on wildlife (reduce road densities and traffic volumes), protect intact habitats and their connection to neighboring properties, site homes in the least impacting areas (adjacent to roads versus clearing mature trees along the back of the parcels, avoiding wildlife migratory corridors, etc.), and permanently protect open space tracts. WDFW can provide further technical assistance regarding this initial work at the request of the county.

Goal 13. Preserve the biological diversity of Kitsap County and Puget Sound using the non-regulatory means as appropriate. WDFW supports the inclusion of non-regulatory approaches to biodiversity conservation. Consider including in Policy NS-71 incentives for improving water quality to further protect shellfish resources and reduce the number of water bodies that are on the 303d list.

Goal 15. Protect and restore anadromous fish runs in Kitsap County using appropriate non-regulatory means. WDFW suggests that Policy NS-73 should also reference Kitsap County's involvement in the "Shared Strategy" process.

Chapter 9 Shorelines- Goal 13. Protect, enhance and restore aquatic habitat areas, such as streams, wetlands, lakes, shellfish beds, herring and smelt spawning areas; and kelp and eelgrass beds. WDFW recommends including sandlance and juvenile salmonid migration areas to this goal. Policy SH-25 and SH-28 will aid in the recovery on shoreline habitat functions. WDFW further recommends including Kitsap County's participation and implementation of the "Puget Sound Partnership" into Policy SH-34. WDFW would also encourage the county to update the Shoreline Master Program as soon as possible to provide higher shoreline protection standards and begin to identify areas for enhancement of shoreline processes.

Urban Growth Area expansion proposals and area-wide rezones. WDFW is concerned with the significant expansions of the Silverdale and South Kitsap UGA's. Approximately 80 percent of these UGA expansions will be zoned "urban low" density. The amount of land needed for expansion could be reduced through further infill incentives in existing urban areas and higher density zoning within the proposed expansion area. According to the Local Habitat Assessment completed by WDFW for Kitsap County, both UGA expansions are proposed in areas of medium value fish and wildlife habitat, with some high value habitat in isolated areas. WDFW suggests that the impacts to fish and wildlife resources, as identified within the EIS, would be avoided and/or minimized by reducing the amount of expansion of the Silverdale and South Kitsap UGA.

WDFW encourages the county to not lower the density in the "urban low" district to 4 du/ac. Reducing minimum densities from 5 du/ac to 4 du/ac within the "urban low/urban cluster"

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residential zones could further encourage sprawl into rural areas. These lower density areas could require future UGA expansions in a shorter period of time to accommodate future growth needs. Such expansion would further impact fish and wildlife resources by degrading existing habitat and increases opportunities for human/wildlife conflicts.

14 cont.

As the County considers new areas of urban growth or infill, WDFW strongly encourages the county to continue working towards adoption of a "Low Impact Development" (LID) ordinance. Development-related impacts could be further reduced through implementation of LID. Such an ordinance should include a very strong incentive-based program to encourage its use. Reducing land/vegetation clearing, soil disturbance and reducing impervious surface levels will go a long way to protecting fish and wildlife habitats.

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Thank you for the opportunity to be involved in the 10-year review and update process and the ability to comment on these documents. If you need any further technical assistance regarding fish and wildlife issues in regards to future planning or if you have any questions, please contact me at 360-895-3965.

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Sincerely,



Jeff Davis
Habitat Program

JD:jd

cc: Tim Gates, CTED
Richard Robohm, WDOE
John Cambalik, PSAT
Alison O'Sullivan, Suquamish Tribe Fisheries Dept.
Ted Labbe, Port Gamble S'Klallam Tribe Natural Resources Dept.
Marty Ereth, Skokomish Tribe Natural Resources Dept.
Jennifer Hayes, WDFW Habitat Program
Stephan Kalinowski, WDFW Region 6 Habitat Program Manager



Washington State Department of Transportation
Douglas B. MacDonald
Secretary of Transportation

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OCT 26 2006
KITSAP COUNTY DEPT. OF COMMUNITY DEVELOPMENT

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Urban Planning Office
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Seattle, WA 98104-2987
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October 19, 2006

Ms. Angie Silva, Planner
Kitsap County Department of Community Development
614 Division St., MS-36
Port Orchard, WA 98366

RE: Kitsap County Comprehensive Plan 2006 Update, Transportation Element

Dear Ms. Silva,

Enclosed are comments by the Washington State Department of Transportation (WSDOT) on the 2006 update to the Kitsap County Comprehensive Plan. The update offers three scenarios that are briefly described as:

- Alternative 1 (no-build) A continuation of the current 1998 comp plan extended to the year 2025.
- Alternative 2 Providing for the highest densification within the UGA with some limited UGA expansion.
- Alternative 3 Providing for less densification than Alternative 2, but greater UGA expansion.

The three scenarios assume that all state highway projects contained in the Washington Transportation Plan (WTP) for Kitsap County will be completed in the 20 year time span covered by this update. While this comprehensive plan update correctly used the WTP for describing segments of the state highway system within Kitsap County that have been identified as already being or becoming deficient and needing attention in the next 20 years, it is important that you realize that this list of deficiencies and potential fixes was created without being financially constrained. Future state transportation needs exceed foreseeable financial resources. The assumption that the county will actually realize all 130 lane-miles of capacity improvements on the state transportation system over the 20 year span is not realistic. The funded project lists for state facilities over the next 16 to 18 years can be found in the 2003 Transportation Funding Package ("Nickel Account") and the 2005 Transportation Funding Package ("Transportation Partnership Account"). I have attached a copy of the project lists for both these funding packages within Kitsap County for your review and use. They can also be found on the WSDOT Olympic Region website located at <http://www.wsdot.wa.gov/Regions/Olympic/Projects/>. The Washington State Transportation Commission is close to adopting the new Washington Transportation Plan. This will be a financially constrained document. It will recommend that our highest priority to address mobility deficiencies will be to address bottlenecks and chokepoints (B&C) in the system. These investments are intended to improve

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throughput by making targeted investments at strategic locations on the state highway system. We strongly suggest this list of improvements, in addition to those already funded projects, be used to identify where mobility improvements are most likely to be implemented in Kitsap County over the next 20 years. A copy of the soon-to be adopted Kitsap B&C list is also attached for your use. Additional review and analysis of the transportation system for each alternative may be needed using these listings of future state transportation projects. Kitsap County should also revise Section K-4 of Appendix K and list the state highway projects that are likely to be constructed over the next 20 years.

As established by Kitsap County's concurrency ordinance, concurrency is satisfied if no more than 15% of county road lane-miles exceed LOS standards. The procedure for determining North, Central, and South deficiencies appears to be dependent upon using a land use model that is performing a county-wide, multi-corridor level type of analysis. WSDOT has some concerns about this methodology. They are:

- Pierce County had a concurrency system that was similar to yours in that it was based on screen lines consisting of 2 to 3 corridors. Recently, they abandoned that system and adopted a single corridor based process because they found the previous method did not work.
- There can be situations where individual links within the travel demand network have significantly different distribution volumes than actual measured traffic volumes.
- Adding even one new signal to a corridor segment will typically reduce mainline (link) capacities in that vicinity. Issues like new signals and new large pipeline developments occurring in a specific corridor are not likely to be picked up by a county-wide land use model. Mitigation needs may be unmet on specific roads due to the model's lack of specificity identifying impacts.
- What is the effect of this kind of methodology on possible development outside of the Urban Growth Areas? Could this type of concurrency ordinance encourage growth outside the cities or conflict with a city's concurrency requirements?
- Finally, the model being used by Kitsap County assumes that all state highway projects in the WTP will be completed in the next 20 years and, as stated earlier, most of those projects will not be completed within that time frame. Flow patterns will likely change dramatically when traffic, assumed to be using an expanded state facility in the future, diverts instead to a local roadway.

In the DEIS, on page 3.2-205, above the four bullets at the bottom of the page, it is stated that, "HRS may be held to the locally adopted operational standards of the jurisdictions in which they are located. (WSDOT 2002)". Please define and/or clarify what is meant by "operational standards."

In the DEIS, within Table 3.2-122, *Potential Strategies to Achieve Balance Between Transportation LOS, Financing, and Land Use*, is found the following potential mitigation measure: *Transfer of County Roads to WSDOT*. "This measure involves

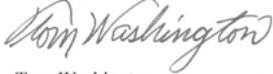
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 Page 3

transferring certain County roads to the state so that the county is no longer directly responsible for capacity improvements on them or LOS impacts". WSDOT does not think that transferring a deficient roadway to another jurisdiction should be considered a mitigation measure. The transportation system works as a whole, and the traveling public does not choose a given route based on jurisdictional ownership. It is troubling that the county would imply that they would not be held accountable for authorizing development that would create LOS impacts on roadways owned by the state. Congestion and LOS impacts are issues that involve more than transferring a deficient roadway to another jurisdiction. Land use and zoning decisions and policies made and created at the local level factor hugely into the congestion and mitigation issue. The WSDOT is faced with too many instances of having to respond to congestion on state roads due to land use decisions made at the local level. WSDOT is in no position financially to assume other roads that are failing to meet LOS standards due to land use decisions made at the local level. WSDOT requests that Kitsap County remove this proposed potential mitigation measure from its comprehensive plan amendment.

Thank you for the opportunity to review and comment on this document. If you have any questions related to this letter please contact me by phone at 206-464-1280 or via e-mail at washint@wsdot.wa.gov.

Sincerely,



Tom Washington
 Senior Transportation Planner
 WSDOT Urban Planning Office

Cc David Andersen CTED MS-48350
 Rocky Piro PSRC
 Bill Wiebe WSDOT MS-47370
 Eric Phillips WSDOT MS-47370
 George Kovich WSDOT MS-47440

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Planning Level

State Route	COUNTY	Starting Milepost (ARM)	Ending Milepost (ARM)	Location	Bottleneck and Chokepoint Description	Bottleneck & Chokepoint Strategy	Cost Estimate (2004\$)
003	Kitsap	34.15	34.95	SR 3 and SR 16	The one lane connections to and from SR 3 at the junction of SR 3/ SR 16 may cause congestion. The merging of two State Routes (SR 3/ SR 16) leads to congestion. A nearby signalized intersection may also cause back-ups.	Eliminate lane drop on SR 16 to NB SR 3 by extending the lane north of the railroad bridge and extending the NB SR 3 on ramp to NB SR 3.	\$19,932,000
003	Kitsap	36.34	36.72	SR 3 and SR 304	The southbound lanes narrow from two to one lane under a bridge structure. This southbound lane reduction at the SR 3/ SR 304 interchange causes large back-ups.	Widen SB SR 3 under bridge and Ramp meter WB SR 304 onto SR 3 and extend on ramp to SB SR 3.	\$10,732,000
104	Kitsap	22.00	24.41	Miller Bay to Kingston Ferry	Traffic Volumes related to Ferry arrival and departures cause congestion	New park and ride/remote ferry holding lot for seasonal peaks and passenger ferry	\$6,566,000
166	Kitsap	4.76	4.88	Jackson Avenue to Mile Hill Drive	A combination of high volumes on a the westbound general purpose lane and signal system cause congestion. High volumes and signalized intersection may cause back-ups.	Add one lane westbound and improve intersection.	\$1,349,000
303	Kitsap	2.91	3.91	SR 303/Riddell Road to McWilliams Road	Heavy turn movements in center turn lanes combined with heavy volumes.	Access management and intersection improvements	\$3,064,000
305	Kitsap	0.00	7.03	Bainbridge Ferry Terminal to Squamish Way	A lack of capacity combined with heavy travel volumes from the ferry causes significant speed reductions throughout this entire section of highway.	Intersection improvements with Transit Queue Jump lanes.	\$3,109,000
305	Kitsap	9.69	10.70	Knoll Road to Poulsbo City Limits	A combination of high volumes on a two-lane facility and signal systems cause congestion.	Characterization: Knoll Rd. - Add left turn lane and center merge lane to SR 305. Johnson Way - Add left turn lanes to SR 305.	\$1,043,000
305	Kitsap	11.98	12.80	SR 305/SR 307 Intersection	A combination of high volumes on a two-lane facility and signal systems cause congestion between SR307 (Bond Road) and NE Liberty Road in Poulsbo. High volumes and signal cause back-ups.	Dual left turn lanes from SB SR 305 to NB SR 307 and an additional lane on 22nd Ave NB SR 307 allowing for more than a 100% merge lane.	\$2,945,000

"It's Your Nickel, Watch It Work!"

			Funding From The 2003 Nickel Package (\$ millions)	Year for Advertising for Bids for Construction Start
ISSAQUAH	King	SR 900, SE 78th St Vicinity to I-90 Vicinity This section of SR 900 in Issaquah is severely congested due to heavy traffic volumes and major commercial development in the surrounding area. During morning and afternoon peak periods traffic backs up onto the I-90 off ramp and nearby city streets. Buses serving the Newport Park and Ride lot are trapped in this congestion. This section of SR 900 also contains a high accident location. Two culverts have been identified as barriers to fish passage. To increase roadway capacity and improve traffic operations, SR 900 will be widened by one lane in each direction from SE 78th Street to I-90. HOV lanes will be constructed between the Park and Ride lot and I-90. Traffic signal improvements, including bus priority, will be provided. Two bridges will be widened and fish passage will be restored to two culverts. Region: Northwest	\$14.8	2007
MILTON - FEDERAL WAY	King, Pierce	SR 161, Jovita Blvd to S 360th St This project will widen SR 161 to five lanes through the commercial area, and to four lanes in residential areas. Roadway in the commercial areas between Milton way and Military Road South will have four through lanes and one two-way left turn lane. Roadway in the residential areas between Military Road South and So. 360th will be four through lanes with left turn pockets at designated intersections. This project when complete will improve traffic flow and reduce congestion and accidents. Region: Northwest	\$24.3	Under Construction
SILVERDALE	Kitsap	SR 3/SR 303 Interchange (Waaga Way) - New Ramp This project constructs a new freeway-to-freeway ramp from northbound SR 3 to southbound SR 303 with a new concrete slab structure undercrossing at Kitsap Mall Blvd., widening Kitsap Mall Blvd/Clear Creek Road including the widening of existing structure. This project when complete will improve traffic flow, reduce congestion, and provide improved access to regional shopping areas. Local partners are committed to providing any additional funding that may be needed for completion. Region: Olympic	\$15.2	2005
NORTH OF PURDY	Kitsap	SR 16, Burley Olalla Interchange This project removes an at grade crossing on SR 16 and Burley-Olalla intersection to improve safety. Region: Olympic	\$14.8	2008
PORT ORCHARD	Kitsap	SR 160/SR 16 to Longlake Road Vicinity This project reconstructs and widens the existing roadway to reduce the accident rate and the severity of accidents. Region: Olympic	\$3.9	2009

"It's Your Nickel, Watch It Work!"

			Funding From The 2003 Nickel Package (\$ millions)	Year for Advertising for Bids for Construction Start
Bremerton	Kitsap	SR 304/SR 3 to Bremerton Ferry Terminal Widens the roadway and constructs HOV lanes to reduce congestion. Amount shown is State's contribution to a City of Bremerton project. Total project cost is \$41M. There are currently four lanes. There will be six lanes when this project is completed. Region: Olympic	\$11.0	n/a
West of Cle Elum	Kittitas	I-90, Cle Elum River Bridge 90/134N Modifies the existing westbound Cle Elum River Bridge to increase the vertical clearance by raising cross frames. Region: South Central	\$1.3	Complete
EAST OF CLE ELUM	Kittitas	I-90, Highline Canal to Elk Heights Congestion relief and improved safety are the benefits of this 2 mile project to construct an eastbound truck climbing lane. This will help decrease the number of accidents due to slow moving trucks climbing the hill. Region: South Central	\$4.0	Complete
WEST OF VANTAGE	Kittitas	I-90, Ryegrass Summit to Vantage This part of I-90 has a 4% hill over a stretch of 9.93 miles. To improve mobility, a westbound truck climbing lane will be constructed. This will also increase safety by reducing the number of accidents due to slow moving truck traffic. Region: South Central	\$8.4	Complete
CHEHALIS FLOOD PLAIN	Lewis	I-5, Chehalis River Flood Control This is a partnership project with the U.S. Army Corps of Engineers, Lewis County, and WSDOT to reduce flood impacts to the Chehalis River Basin and Interstate 5. Region: Southwest	\$30.0	2007
SOUTH OF CHEHALIS	Lewis	I-5, Rush Road to 13th Street Improves freight mobility, economic development and safety by adding one lane in each direction from Rush Road to 13th Street and constructing an interchange at Labree Road. Funding also includes approximately \$31 million for Chehalis River Basin flood control project. There are currently four lanes. There will be six lanes when this project is completed. Region: Southwest	\$41.4	2007
HOOD CANAL	Mason	SR 106, Skobob Creek - Fish Passage This project is the state's contribution to a partnership project that replaces a fish barrier culvert with a bridge. Local partnership funding is required for completion and is expected to be provided by the Hood Canal Salmon Enhancement Group. Region: Olympic	\$1.8	Under Construction

2005 Transportation Partnership Funding Package

			(\$ millions)	Construction Season
Kitsap			\$326.7	
Regionwide	Roadway Safety	State Highways in East Clallam, Jefferson, Kitsap and Mason Counties Roadside Safety Improvements Install guardrail, remove fixed objects or improve roadsides to enhance motorist safety by reducing the severity of collisions on SR3, 101, 104, 106, 107, 300, 302 and 307.	\$2.9	2006
Statewide	Roadway Safety	Bridge Seismic Retrofit - High Risk Zone Seismic retrofit on bridges in high risk zones.	\$57.0	2009
Gorst	Roadway Safety	SR 3/Imperial Way to Sunnyslope - Safety Adding a passing lane and two way left turn lane on SR 3, and extending the existing truck climbing lane on SR 3 southbound. This project will reduce the rate of automobile collisions, as well as the severity of collisions.	\$2.5	2006
Gig Harbor	Roadway Safety	SR 16 /NW of Tacoma Narrows to SE of Burley/Olalla - Median Cross Over Protection Install new cable guardrail in the median to reduce head-on collisions.	\$0.9	2006
Poulsbo/Kitsap County	Roadway Safety	SR 307 / SR 104 Safety Corridor Study Conduct corridor study to identify potential safety improvements on SR 307 and SR 104. Implement spot safety improvements as identified in the study. Project definition and schedule in development.	\$5.0	2007
Hood Canal	Roadway Safety	SR 104/Hood Canal Bridge East Half Replace the existing bridge with a new bridge designed to current standards.	\$162.1	2003
Bainbridge Island Terminal	Ferries	Bainbridge Island Multimodal Terminal Improvements Adds new capacity at the Bainbridge Island Terminal by building a third slip. Builds a transit deck, overhead passenger loading span and increases bicycle storage. Improves traffic flow on the city street.	\$81.3	2013
Belfair	Choke Points & Congestion	SR 3/Belfair Bypass - New Alignment This projects constructs a new alignment around the town of Belfair to reduce travel time. The \$15 million will provide the resources to complete the environmental process, identify all right of way required and completes design including contract plans. Project definition and schedule in development.	\$15.0	



RECEIVED
SEP 21 2006
KITSAP COUNTY DEPT OF
COMMUNITY DEVELOPMENT

September 20, 2006

Dear Commissioners,

Washington State University Kitsap County Extension serves as "the front door to the University" in Kitsap County. We provide educational programs which range from agriculture, forestry and horticulture to community and economic development, and human development. We draw on experience to offer the following suggestions for your current review and update of the Kitsap County Comprehensive Plan, specifically for the Rural and Resource Lands and the Economic Development chapters.

1. Rural and Resource Land Chapter.

We work with over 500 farmers and observe that the emphasis on the county's rural "character" minimizes some of the active functions in the non-urban areas. In fact, Kitsap Extension is coordinating with a number of rural residents to conduct an opinion survey about actual rural land uses, marketing techniques and support systems (a copy is attached).

To date, 72 surveys have been entered into a database, giving us some much-needed facts about local activities and products. Respondents have until September 30 to return the surveys, and those received so far indicate that feedback will offer important direction for public policies.

For example, the preliminary responses to Question 6, "Do you think Kitsap County government supports farming/rural activities?" show that 12 agree, 19 have no opinion, and 38 disagree. Some reasons given for the response include, "They don't understand that there are really farms here," "severe restrictions on agricultural activity," "permit applications for farming activities are not based in reality for typical farmer," or "I have attended some of the "visioning" sessions with Kitsap County planners. There was NO recognition at all, either in space planning or economic value." Question 7 asks, "Do you think small farming businesses are viable in Kitsap County?" Fifty of the 72 replies agree that small farming is viable here, while ten do not, and ten have no opinion.

Please contact me if this office can assist you in assuring that such opinions are reflected in the Comprehensive Plan policies, integrated with the subarea plans and the statement of relationship to vision.

345 6th Street, Suite 550, Bremerton, WA 98337-1874
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Cooperating agencies: Washington State University, U.S. Department of Agriculture, and Kitsap County Extension programs and employment are available to all without discrimination. Evidence of noncompliance may be reported through your local Extension office.

2. Economic Development Chapter.

I notice that the pages outlining how economic development relates to visions for other elements contains no economic development concepts for Rural Areas, even as it states that "Natural resource activities, such as forestry, agriculture, and mining continue to contribute to the rural character and economy." If you wish additional data to dispel this contradiction, please contact me.

Since WSU-Kitsap County Extension has participated with the "Bringing it Home to Kitsap" Education Collective, the information contained in the recently published *Kitsap Learns: Needs Assessment for Education, Workforce Development and Economic Development* can further define the clusters for future economic growth of Kitsap County. Since education is itself a foundational industry, I also recommend the addition of an education goal for economic development. Further, since Entrepreneurship is an essential ingredient in the WSU Business Management portfolio, and because Kitsap is home to over 6,000 small, locally owned business, an entrepreneurship goal is also appropriate.

Respectfully,

Arno W. Bergstrom, Director

**KITSAP COUNTY RURAL/AGRICULTURE* SURVEY
2006**

Those who grow crops and livestock believe that land-based businesses are an important part of our Kitsap County community. We seek information about such activities and invite you to answer the following questions to help build a database about them. We will compile this data (without identifying individuals) and promote its use for public policies that affect local areas.

What do we call the uses we make of land outside the cities. Is it farming? Agriculture? Rural? Ranching? Country? Or something else? What do you consider your operation to be?

- How much land do you farm or ranch? *Circle the one that applies*
Less than 1 acre 1-2 acres 2-5 acres 5-10 acres 10 or more acres
- What is your area of interest? *Check all that apply:* Zip code? _____
Nursery _____ Tourism & Recreation _____ Forestry _____
Horticulture _____ Livestock _____ Home business _____
Agriculture _____ Livestock products _____
Other (please specify) _____
- What is your primary product or activity?

Secondary product or activity? _____
Other? _____
- Do you sell your farming/products? Yes _____ No _____ How? *Circle any that apply.*
CSA Farmers Market Direct sales Restaurants
Trade or barter Food bank Grocery store Other _____
- How do you promote your farm/products? _____
What agriculture promotions would you like to see in Kitsap County? *Circle those you want.*
Blog Newspaper articles Web site
Farm maps Signs Other _____
- Do you think Kitsap County government supports farming/rural activities?
Strongly agree ___ Agree ___ No opinion ___ Disagree ___ Strongly Disagree ___
Why? _____
- Do you think small farming businesses are viable in Kitsap County?
Strongly agree ___ Agree ___ No opinion ___ Disagree ___ Strongly Disagree ___

*Agriculture: the science, art, or practice of cultivating the soil, producing crops, and raising livestock and in varying degrees the preparation and marketing of the resulting products (downloaded 8/15/06 from www.m-w.com/dictionary/agriculture)

- Who do you go to for help on farming questions? *Circle those you use*
Feed store WSU Extension, Conservation District
Internet Books Kitsap Community Ag Alliance
Other _____

- What additional assistance would you like to see in Kitsap County? *Circle top 3*
Small Farm Expo Rural Forest Commission
Education programs(_____) Forestry-related organizations _____
Model business plans Forest stewards
Meat processing facilities Forestry training for youth
Commercial kitchen Small business advisors
Drainage options Fire management plans
Ag-related home-based business regulations Rural general stores
Agriculture Commission Equine sports availability
Other _____

- What allies/organizations do you work with? *Circle all those you work with*
Community organizations (_____)
Agencies: Kitsap Comm. Agriculture Alliance Farmers' Market Association
 Future Farmers of America Conservation District
 WSU Extension Farm Bureau
Educators Grade schools _____ High schools _____
 Colleges/Universities _____ Other _____
Suppliers Feed stores Tractor dealers
Any others? _____

- Are you in favor of a Kitsap County Rural/Agriculture Council (a group that will advocate for economic strategies and preservation of working land)?
- What is the value of your agriculture-based business? _____
- Is there anything else you want to add?

Thank you for taking the time to answer these questions.
Would you like to receive information about the results of this survey? If so, please provide the following information:

Name _____ Farm Name _____
Address _____ City, Zip _____
Phone _____ E-mail _____

Return to: WSU Kitsap Extension
345 6th Street, Suite 550
Bremerton, WA 98337