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KitsapCounty

COMMUNITY DEVELOPMENT

ADMINISTRATIVE STAFF REPORT

Project Name: RNR INVESTMENTS LLC/Harris Road

Permit Number: 24-02271

Application Type: Preliminary Short Plat Amendment

Parcel Number: 012301-2-008-2005

Applicant/Owner: RNR Investments LLC
8573 Dormar Dr SE
Port Orchard, WA 98367
rupadara@hotmail.com

Project Overview:

The applicant proposes to amend Preliminary Short Plat #18-05346 by reducing the number of lots from four (4) to three (3), modifying the site layout, and revising the associated stormwater design.

Applicable Regulations

The application was reviewed in accordance with all applicable regulations, including the following:

- Kitsap County Code Title 11 – Roads, Highways and Bridges
- Kitsap County Code Title 12 – Stormwater Drainage
- Kitsap County Code Title 16 – Land Division and Development
- Kitsap County Code Title 17 – Zoning
- Kitsap County Road Standards
- Kitsap County Stormwater Design Manual

Decision: Denied

Decision Date: 09/09/2026

Approved by:

A handwritten signature in cursive script that reads "Cecilia Olsen".

Cecilia Olsen, Assistant Director



I. FINDINGS OF FACT

A. Original Preliminary Short Plat Approval

On April 10, 2019, DCD issued preliminary approval for Short Subdivision #7442 under Permit Application #18-05346. The approved preliminary short plat proposed to create four lots for single family residential development.

The 2019 approval was based upon the plans, reports, and exhibits contained in the application record. The decision provided that changes or deviations from the approved plans, proposal, or conditions were subject to further County review and approval.

The decision required construction plans and profiles for roads, storm drainage facilities, and related improvements to be submitted for County review and acceptance before construction. It further required a Site Development Activity Permit demonstrating compliance with Minimum Requirements #1-9.

The approved plans and conditions treated the interior access as an interior plat road. The approval required vertical curb, gutter, and a minimum five-foot-wide sidewalk along the south side of the interior plat road.

B. Proposed Amendment

The current application proposes to reduce the approved short plat from four lots to three lots. The proposed development consists of one single-family residence and two duplexes, for a total of five dwelling units.

The amendment modifies the lot configuration, building layout, parking arrangement, internal access, grading, and stormwater design from those evaluated under the original preliminary approval.

The revised drainage report identifies approximately 7,218 square feet of roof area and approximately 7,144 square feet of driveway, parking, and sidewalk area, for a total of approximately 14,362 square feet of new hard surface.

C. Preliminary Stormwater Review Standard

Pursuant to KCSDM Vol. II, Section 1.2.3.2, preliminary stormwater design review is required for projects requiring land use approval. The purpose of preliminary design review is to demonstrate that the proposed project is feasible and can meet the applicable standards and requirements. Preliminary stormwater documents are required to be prepared to a minimum 60% design level and include, among other information, proposed stormwater flow directions and methods of conveyance, proposed locations and sizes of stormwater best management practices (BMPs), roadway plans, and sufficient engineering information to evaluate compliance with the Kitsap County Stormwater Design Manual.

D. Development Engineering Review History

DCD conducted four review cycles for the amendment application.



1st Review Cycle

Development Engineering requested additional information addressing, among other matters:

- The proposed compliance pathway for Minimum Requirement #5;
- Infiltration feasibility and the relationship between test pits and proposed infiltration facilities;
- Design justification for roof infiltration facilities;
- Calculations and analysis for BMP T9.40 (Vegetated Filter Strip);
- Downstream drainage analysis;
- Proposed flow paths and conveyance methods; and
- The relationship between the proposed stormwater design and the required curb, gutter, and sidewalk improvements.

2nd Review Cycle

Engineering determined that several 1st cycle comments had not been addressed and repeated its requests for:

- Supporting calculations;
- Infiltration information;
- Vegetated filter strip analysis; and
- Incorporation of required roadway improvements into the drainage design.

3rd Review Cycle

The applicant submitted revised plans and written responses but did not submit a revised drainage report or a complete supporting calculation package. The applicant:

- Asserted that the interior plat road should instead be classified as a shared driveway under KCC 16.24.040(A)(4);
- Requested removal of the sidewalk requirement so that additional land area could be used for stormwater BMPs;
- Asserted that additional infiltration testing was unnecessary; and
- Maintained that a vegetated filter strip and sheet-flow dispersion could satisfy the applicable stormwater requirements.

Development Engineering determined that the 3rd cycle materials did not include sufficient calculations or supporting information to verify:

- The required length of the vegetated filter strip;
- The required sheet-flow dispersion length;
- Compliance with the applicable transition-zone requirement;
- The grading and mitigation of runoff from parking areas;
- The total tributary area directed to each proposed BMP; or
- That flow from the proposed hard surfaces would remain nonconcentrated.

4th Review Cycle

The applicant submitted a revised drainage report and revised engineering plans dated April 24, 2026. The revised report replaced the earlier roof infiltration and vegetated filter strip



approaches with a concept using continuous runoff modeling with bioretention, amended soils, and infiltration.

E. Applicability of Stormwater Minimum Requirements and Compliance

After four review cycles, the submitted information remained insufficient to demonstrate that the amended project was feasible and capable of meeting the applicable stormwater standards at the preliminary design stage.

The drainage report identifies approximately 14,632 square feet of new hard surface and acknowledges that the proposal is subject to Minimum Requirements #1-9, as established by Kitsap County Code and the Kitsap County Stormwater Design Manual. Compliance requires selection, design, and implementation of BMPs consistent with the County's standards and the Department of Ecology's Stormwater Management Manual for Western Washington (SWMMWW).

Development Engineering's review considers not only infiltration assumptions, but whether the applicant's analysis, documentation, and plans demonstrate how the project will comply with each applicable Minimum Requirement. As detailed below, the submitted materials do not show compliance with Minimum Requirements #1-9.

The drainage report proposes directing runoff from roofs, parking areas, and internal access areas into lawn, landscape, or depressed infiltrations areas, supported primarily by continuous runoff modeling that predicts 99.9% infiltration.

However, the modeled facilities shown in the WWHM report as three bioretention routing elements and a "Trapezoidal Pond" do not appear on the engineering plan set. The plans do not identify bioretention facilities with locations, dimensions, storage depths, side slopes, or media profiles matching the modeled elements. Landscaped area labeled as bioretention under BMP T5.13 (Post Construction Soil Quality and Depth) do not show the design features required for BMP T7.30 (Bioretention). No complete conveyance system is shown demonstrating how runoff reaches the facilities modeled in WWHM.

Because the plans do not depict the facilities represented in modeling, Development Engineering could not confirm compliance with infiltration performance standards.

The drainage report states that runoff treatment would be provided through LID BMPs and amended soils. Under KCSDM, Vol. II, Section 5.4.1.3, amended soils (BMP T5.13) may be used for certain on-site management and flow control purposes but cannot independently satisfy Minimum Requirement #6 for Runoff Treatment. The 4th Cycle submittal did not demonstrate that modeled landscape areas meet bioretention design standards. Therefore, the proposal does not demonstrate compliance with Minimum Requirement #6.

The report also asserts the project is exempt from flow control because proposed LID measures render impervious surfaces ineffective. Development Engineering determined that the proposal did not demonstrate that the surfaces qualify as ineffective impervious surfaces through:

- Full dispersion (100 feet of native vegetation);
- Downspout full infiltration meeting applicable BMP criteria; or
- Approved continuous runoff modeling showing full infiltration.



Therefore, Minimum Requirement #7 remains applicable, and compliance with Minimum Requirement #7 was not demonstrated to be feasible.

The preliminary submittal does not show a single, internally consistent stormwater design that incorporates:

- Required roadway and sidewalk improvements,
- Complete grading and flow paths,
- Treatment of all pollution-generating hard surfaces,
- Compliance with Minimum Requirements #6 and #7.

Accordingly, Development Engineering cannot conclude that the proposed design meets applicable stormwater standards.

F. Internal Access and Required Improvements

KCC 16.24.040(A)(4) authorizes a shared driveway only for access serving up to two lots. The proposed internal access would serve three lots, and is therefore must be reviewed as a private road.

Because the proposed internal access is a private road, the sidewalk requirements of KCC 16.24.040(C) apply unless modified through a compliant amendment. The original condition requiring curb, gutter, and sidewalk along the interior plat road remains in effect. The applicant's stormwater design proposal relies on landscaped areas adjacent to the internal access for dispersion, treatment, infiltration, or related stormwater functions. Construction of the required curb, gutter, and sidewalk affects the width, grading, available landscaped area, and runoff paths, all of which impact stormwater compliance.

G. CONCLUSIONS

The applicant bears the burden of submitting complete and responsive application materials sufficient for Kitsap County DCD to evaluate compliance with applicable County codes, standards, and permitting requirements.

Following four review cycles, the applicant did not provide sufficient technical information for the County to verify that the amended proposal complied with the applicable provisions of Kitsap County Code Title 12, the Kitsap County Stormwater Design Manual, and the subdivision standards incorporated through Title 16. Because compliance with applicable County requirements has not been demonstrated, the application cannot be approved.

H. DECISION

Based upon the foregoing Findings of Fact and Conclusions, Preliminary Short Plat Amendment #24-02271 is hereby **DENIED**.

THE DECISION OF THE DEPARTMENT IS FINAL, UNLESS TIMELY APPEALED AS PROVIDED BY KCC 21.04.

