

Year of Rural Comment Form

09/24/25-11/10/25

Submitted	Id	Name First	Name Last	Comments	Attachment	City	State
9/24/2025	320	Paige	Slater	Abandon all zoning changes related to equestrian facilities. These establishments are an important part of our community and we humbly ask that these zoning laws be reevaluated with the people in mind.	--	Bremerton	Washington
9/24/2025	321	Rebekah	Linden	In regards to Rural and Resource Lands, Agriculture, and Equestrian facilities, nothing needs to change. Farms and Equestrian facilities should operate the way they see fit in order to stay open.	--	Poulsbo	Washington
9/24/2025	322	Tonya	Kinzler	Abandon all zoning code related to equestrians facilities	--	Bremerton	
9/24/2025	323	Jaime	Douglas	This proposal would be an unnecessary burden on small farms and small equestrian businesses. I see no benefit in these changes for the community at large. This is a waste of resources and time. The proposal should be abandoned.	--	Poulsbo	Washington
9/24/2025	324	Alan	Vanfossen	Leave the horse people alone. Stop the land grab	--	BREMERTON	
9/24/2025	325	DR Dawn	Onesty	I am opposed to changing zoning to benefit creating more housing that removes rural businesses like horse farms	--	Seattle	Washington
9/24/2025	326	Donna	Alber	Against this without public contact being available in a truly effective way. Very few of my neighbors or contacts out knew what was going on. I think you are just a sneaky way to add more taxes in a ruthless taxing state..	--	Seabeck	Washington
9/24/2025	327	Betsy	Carmona	To: Kitsap County Planning Commissioners and Department of Community Development I am writing in strong opposition to the proposed revisions to the county code governing horse facilities. As residents and supporters of rural Kitsap County, the community believes these changes unfairly and unnecessarily target horse owners, small farmers, 4-H families, and equine businesses. If adopted, everyday activities—boarding a few horses, offering lessons, or hosting small clinics—would suddenly require expensive permits, restrictive setbacks, and new layers of bureaucratic approval. The proposed 200-foot setback alone would make it physically impossible for many small-acreage landowners to continue housing horses on their own property. The community has responsibly cared for animals for generations, contributing to the cultural, economic, and historical fabric of Kitsap County. These revisions treat the community as though it is running industrial operations, when in reality, small equine facilities are community-focused, low-impact, and an essential part of rural life. To the community, this looks less like a public interest measure and more like another revenue-generating effort by the County. What makes this even more frustrating is that the County recently approved \$16 million in funding for a single NGO—an expense that has nothing to do with the basic responsibility of running a functional local government. The community is not against helping people in need, but government must first fulfill its core duties, starting with public safety and responsible governance. If these rules move forward, small farms will be forced out, youth programs like 4-H will suffer, and the rural lifestyle that has defined Kitsap County will be pushed out of existence. Even more concerning is the precedent: unelected administrators should not be able to regulate lawful, long-standing uses of private property out of existence without due process or compensation. The September 23, 2025, Planning Commission hearing is a pivotal moment. The community urges you to listen to the people you represent. Protect rural heritage, respect the rights of property owners, and withdraw these harmful and unconstitutional revisions. Sincerely, Betsy Carmona 10559 Central Valley RD NE Poulsbo, WA 98370	--	Poulsbo	Washington
9/24/2025	328	Linda	Heath	This comment section is probably on purpose very difficult to use . Going back to erase or correct something is virtually impossible without erasing what was already written. Where else can I write out and comment where I can see all I've written before submitting??	--	Bremerton	Washington
9/24/2025	329	Roni	Ryan	Please seat an Ag Council. It was promised to us so many times, it's upsetting that we need to keep asking for it. Our county can not keep moving forward without a voice from our farmers. We already have so many challenges and setbacks that's is very hard to not feel like farmers are not welcome here. They are the foundation of any community, any landscape, any country. We all eat and it is our right to choose something other than the grocery store. Please do the right thing, let us have an Ag Council, let us help guide our county down paths we can all benefit from. Our efforts are important and needed.	--	Poulsbo	Washington

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				Here are the signatures collected from the Save Our States petition. 1000 in total. Name, City, State, Postal Code, Country, signed On Clif PetersonUnited States9/15/2025 Mariah FairKingstonWA98346United States9/15/2025 Kelli TalentPort OrchardWA98367United States9/15/2025 Keri PetersonPort OrchardWA98367United States9/15/2025 Stephanie OsterdayPoulsboWA98370United States9/15/2025 Hannah PetersonPort OrchardWA98366United States9/15/2025 John SiegristPort OrchardWA98367United States9/15/2025 Caden RosasPort OrchardWA98366United States9/15/2025 Ryland RosasPort OrchardWA98366United States9/15/2025 Stacy RuppSilverdaleWA98383United States9/15/2025 Amber LongworthPoulsboWA98370United States9/15/2025 Noellani KarryKingstonWA98346United States9/15/2025 Tami BerryPoulsboWA98370United States9/15/2025 Kris DailySeabeckWA98380United States9/15/2025 Jordan MillerBoringOR97009United States9/15/2025 Trina RhotonPort OrchardWA98367United States9/15/2025 Jessica NoldPoulsboWA98370United States9/15/2025 Judah PetersonPort OrchardWA98367United States9/15/2025 Jodi DickeyPort OrchardWA98366United States9/16/2025 Gregory GillyTygh ValleyOR97063United States9/16/2025 Kimberly WilsonPort OrchardWA98367United States9/16/2025 Shanna FogelmanPort OrchardWA98366United States9/16/2025 Hudson HallPort OrchardWA98367United States9/16/2025 Sadie WhiteSilverdaleWA98383United States9/16/2025 Thomas EricksonGig HarborWA98329United States9/16/2025 Katelyn TaylorKingstonWA98346United States9/16/2025 Marcia AdamsSheltonWA98584United States9/16/2025 K GossPort OrchardWA98367United States9/16/2025 Pamela GeorgeBremertonWA98310United States9/16/2025 Nicole CarterTahuyaWA98588United States9/16/2025 Andeara Purdy-HohnSilverdaleWA98383United States9/16/2025 Kristen K. ManweilerPort OrchardWA98367United States9/16/2025 Allison HartmanBremertonWA98312United States9/16/2025 Rachel EdwardsPort OrchardWA98366United States9/16/2025 Valerie SeamansBremertonWA98312United States9/16/2025 Michel StumpPort OrchardWA98367United States9/16/2025 Kimberly McClureBelfairWA98528United States9/16/2025 Oliver AyersPort OrchardWA98367United States9/16/2025 Kaya BerryPoulsboWA98370United States9/16/2025 Ashley DixonSilverdaleWA98383United States9/16/2025 Rainwater JamesBelfairWA98528United States9/16/2025 Michael PaddockPoulsboWA98370United States9/16/2025 Roy EissPort OrchardWA98367United States9/16/2025 Aubree CaddockPort OrchardWA98367United States9/16/2025 Steven ChristensenSilverdaleWA98383United States9/16/2025 Ashlynn ClemontTahuyaWA98588United States9/16/2025 Kara WalterGig HarborWA98329United States9/16/2025 Stephanie FleckBremertonWA98311United States9/16/2025 Ami drakeTahuyaWA98588United States9/16/2025 Erica MorsePort OrchardWA98367United States9/16/2025 Julie Ruzanka ToulonOallaWA98359United States9/16/2025 Deborah HowardPort OrchardWA98366United States9/16/2025 Michele AndersonSheltonWA98584United States9/16/2025 Gail HowleySeabeckWA98380United States9/16/2025 Briar CrowPoulsboWA98370United States9/16/2025			
9/24/2025	330	Clifton	Peterson		See Attachment	Port Orchard	Washington
9/24/2025	331	Clifton	Peterson	This Comment portal should have a Upload document options for clarity and ease of public use.	--	Port Orchard	Washington

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9/24/2025	332	Clifton	Peterson	Save our Stables Petition comments: Katelyn Taylor Kingston WA 98346 United States 9/16/2025 "The proposed changes to the county code are absolutely ridiculous. All because of ONE persons CIVIL DISCOURSE with a barn owner in the County. This feels like a land/money grab and like the county is looking for a way to push out rural folks just trying to make a living." Rainwater James Belfair WA 98528 United States 9/16/2025 "Stephanie C. James" Ami drake Tahuya WA 98588 United States 9/16/2025 "After my stroke on 11-10-23 Buying our horse as made a huge difference in therapy for myself and helped my teenage daughter in so many ways. Including joining the high school WAHSET team . Without the facility we have to board at , we would loose the horse that has brought so much happiness and therapy to us . Please no changes." Nicole Hafner Bremerton WA 98312 United States 9/16/2025 "Horses have provided three generations of my family with structure, discipline, and invaluable mental, emotional, and physical support. Through them, we've found personal growth, healing, and community. In many ways, horses and the programs built around them have truly helped save our lives and our sanity. That's why it's so discouraging to see barriers being put in place that make it harder for families like mine to continue benefiting from these programs. The value of horses and equestrian communities cannot be reduced to money alone. They provide stability, wellness, and development that extend far beyond financial measures. I ask that we remember what is really at stake here: the well-being of individuals, families, and communities. Protecting access to these opportunities is not just about preserving a tradition—it's about safeguarding a proven source of growth, resilience, and support for generations to come." Jordan Banks Gig Harbor WA 98335 United States 9/16/2025 "I grew up in rural Kitsap County and getting to have horses and learn about their care, how to ride and all of the many aspects of horse ownership shaped me into the strong, yet sensitive and caring woman I am today. I now teach others the same skills I learned as a child and beyond as a horse trainer, riding instructor and barn manager. All because of horses. The value horses bring to a community far exceed any "inconveniences" and their presence is honestly needed now more than ever in an increasingly digital world. Getting your feet grounded in the actual dirt next to your equine companion not only teaches you who you are at your core, it also develops empathy for others, and it helps calm and ground our souls in this ever chaotic landscape of a world we are living in now. Horses have a grounding essence and anyone fortunate enough to truly connect with a horse will never question their value or role in our society. Please help keep horses a treasured part of childhood and part of what keeps adults young at heart! Also where are all the horses going to go if these proposals gets approved. Do you know how many horses will become homeless if current facilities and private homes are no longer able to keep horses or able to afford to keep them? I don't know the number either, but I can assure you it will be an expansive new problem you were not anticipating. Barn owners are already operating at a loss and they do it because they love horses. Add more fees however and not many are going to survive it. Horses are woven into our history and the fabric of a rural life.	See Attachment	Port Orchard	Washington
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9/24/2025	332	Clifton	Peterson	Many many people move to rural communities in order to live with horses and sustain a financially modest but soulfully rich life with horses by their side. So many work hard to realize the dream of this rural lifestyle with horses... ..please don't take their freedom to do so away. Respectfully and God Bless..." Susie Howes Kingston, WA 98346 United States 9/16/2025 My family has lived in Hansville since the 40's. Horses have been a major part of Hansville's culture since then. My father used his teams to log and slip scoop sand to clear sand from the fishing boat tracks amongst many other jobs. We have volunteered for decades (actually doing jobs prior to trails being named and having organized overseers) many trail jobs county wide, using both draft horse and mule teams as well as pack strings and single horses to construct and maintain numerous trail systems county wide. There is even a plaque on Bainbridge honoring him and his team for their help with Bainbridge's trail systems. He has hauled dignitaries into the Rodeo and through many parades. He volunteered his team and wagon giving hayrides at Corey's Day on the Farm for decades. I grew up riding my Shetland pony all over Hansville. I still ride my horse all over Hansville. Ive volunteered for decades with the Back Country Horseman, 4-H and The Hansville Greenway. My daughter grew up doing the same. What the county is proposing is wrong. Horses are a major part of Kitsap's culture. This special way of life should be cherished and protected! How dare them for trying to turn Kitsap into another city/suburb as those on the East side of the Sound. Ive been sickened since hearing about the county's current actions." Jeanne Toulon Kalahoon, HI 96741 United States 9/16/2025 If this started because a new person bought a piece of property and moved into the area, this is truly idiotic. Surely she knew about its rural and heavily equestrian areas. She obviously didn't do her due diligence and that's her problem. This shouldn't affect the old timers and they should be grandfathered in. It's totally amazing that it has gone this far."	See Attachment	Port Orchard	Washington
9/24/2025	332	Clifton	Peterson	Crystal Hart Poulson, WA 98370 United States 9/16/2025 Our horses and livestock are a vital part of rural Kitsap County, and they deserve protection. We need code that supports and safeguards our equine friends and rural way of life. It should never be the case that someone moves in next to a farm, ranch, or horse business — and then tries to push that operation out because they don't like the sounds, smells, or sights of animals. If you choose to buy property next to farmland, you should expect farming and livestock. That's part of what makes our county unique and vibrant. Our horses support small businesses here too — veterinarians, farriers, feed stores, trainers, and barns. When you limit horses, you hurt local families and the local economy. More importantly, you hurt our kids, our traditions, and the sense of freedom and connection that comes with riding and caring for these animals. We should not be regulated out of the ability to keep horses and livestock on our land. These proposed changes threaten to do exactly that, stripping away traditions, livelihoods, and opportunities for families, kids, and the community. Kitsap County should be protecting and encouraging the rural lifestyle that makes this place special, not regulating it out of existence. Please stand with horse owners and preserve our right to keep horses on our land." Tracy Abbott, Seattle, WA 98125 United States 9/16/2025 I have a small hobby farm with two ponies for me and my grandkids this would destroy my grandkids if they had to get rid of there ponies this teaches me that they don't matter all because one person can't fallow the rules why hurt everybody else. Sad. Sad. Sad" Nina Halvorson, Olalla, WA 98359 United States 9/16/2025 I lived in kitsap my entire life. While I now have relocated, having the ability to not only ride horses but then have them at home was an absolute dream come true. I then was able to build a business and share horses with others. If the county takes even more rights away from homeowners, the equine community is not only at stake but our inherent rights as property owners. There's already so much regulation, adding more because of ONE complaint is seriously going to drive out freedom from the people but also they too will choose to leave the county and or state." Jasmine Sullivan, Seabeck, WA 98380 United States 9/17/2025 I am a sixteen year old 4-Her and U own two horses who are members of the 4-H community. If the county passes this it will effect all horse and livestock owners. The livestock and horses are a big contributing part of Kitsap County bringing many tourists to view and experience these animals and the events. With the many regulations that are already in effect, these will make it almost impossible to own or lease horses. This will lead to the destruction and demolition of the community and culture that Kitsap County is known and loved for. Please stand with us so we can support future generations in this dream and make this experience accessible for all." Cassandea Hall, Milton, WA 98354 United States 9/17/2025 The rule changes will ruin small farms in businesses. When you push small farms and businesses out, no one wins."	See Attachment	Port Orchard	Washington

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9/24/2025	332	Clifton	Peterson	Nick Balera Tacoma WA 98407 United States 9/17/2025 "Think about the impact you're actually causing. Laws are made to protect and serve the people - but when they instead do the opposite - bring harm and difficulty for the operation and financial wellbeing of the community this no longer becomes something of help, use and benefit. Why the need for change all of the sudden, why the need to have unnecessary control and additional costs attached. This state is constantly adding costs and taxes and fees onto everything making it harder each year for people to afford to live here. Care about your community, think about the people and do what's best for those who you're looking for impact." Robert McGee Port Orchard WA 98366 United States 9/17/2025 "I may not own horses myself, but I stand in support with Kitsap's equestrian community because these proposed code changes threaten their rural way of life, small farms, and youth programs that make this county unique. Responsible horse owners have been part of Kitsap for generations, and this ordinance represents government overreach that could regulate them out of existence. This is not just about horses — it's about protecting rural heritage, family farms, and community programs like 4-H and therapeutic riding that benefit us all. Blanket 200-foot setbacks and costly permits will shut down small farms; what we need are balanced, science-based solutions that protect the environment without destroying rural character." Sierra Silvernale Port Orchard WA 98367 United States 9/17/2025 "We should care about not taking the horse community out completely. We grew up western so did our parents, grandparents and great grandparents. Horses are best friends, a team mate, and loyal companions. Think back on time; how did people get around. So please think about this." Brandon Greenhill Port Orchard WA 98367 United States 9/18/2025 "Remember this: our state is allowing crime to run rampant, and this county is doing no better. We, the people, have constitutionally protected rights to control what happens on our own property — not the government. Under the Fifth and Fourteenth Amendments to the U.S. Constitution, no government can deprive a person of life, liberty, or property without due process of law. Article I, Section 16 of our state constitution guarantees the right to own and enjoy property, and protects citizens from unlawful takings. If this county refuses to listen to the voices of its citizens, then I say we take lawful action. Every person on this petition should consult an attorney and explore a class action lawsuit against the county for violations of our rights. Counties are political subdivisions funded by our tax dollars — dollars that, by law, must be spent transparently and for the public good (see RCW 84.52.050 on lawful taxation and expenditure in Washington). This is the same county that gladly takes our hard-earned money through taxation, while failing to uphold its duty to protect public safety and property rights. That ends now. It's time to stand up and stand strong. If they come after us, we will respond — not with anger, but with law, unity, and overwhelming resolve. We will come back 100 times stronger, and we will hold every decision-maker accountable under the law."	See Attachment	Port Orchard	Washington
9/24/2025	332	Clifton	Peterson	Russell Robinson Chico CA 95928 United States 9/19/2025 "NoMoreCorruption" Angela McKee University Place WA 98467 United States 9/19/2025 "Our family started with my son taking lessons with a 4-H family at a local farm in Kitsap County. Then we joined 4-H, an educational program where the animal is the conduit for learning. Over our 8 years in 4-H, my son grew from a distracted little kid to become a responsible, respectful and kind young man. Doing club group activities with the horses at different local farms and trail systems on the Kitsap peninsula and nearby Key Peninsula is a critical element to 4-H. 4-H and other programs such as WASET in the high-schools, local pony clubs, equestrian vaulting and other local events are what keep these educational programs affordable and within reach of our rural young people. Limiting these fundamentally rural opportunities by the proposed zoning changes for family farms with horses would effectively kill these programs in Kitsap County and set dangerous precedent for all remaining rural areas in the Puget Sound area."	See Attachment	Port Orchard	Washington

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				50 years ago we liked to say that Kitsap County had more horses than people. In days before young brains were sucked into screens they taught people duty, respect, responsibility and how to care. They teach priorities. The horse care and wellbeing came first. Before school we carried hot water in a bucket to the barn and fed. After school we groomed, exercised, cleaned the barn and scooped poop. We fed and bedded them down for the night. If we were not doing the work willingly we no longer had the honor of belonging to that horse. If you blamed your horse for a poor performance or not winning, it was understood you would no longer be a horse owner. Horses are one of the few face to face interactions left. Riding clubs, 4-H, FFA, horse shows, playdays, junior rodeos, county fairs, lesson barns, all horse activities give you a community where you are instantly accepted. We learned to work together, help each other and share. We may be competing against each other but if you had a problem with your horse other participants would offer you their horse. It is expected that you pull over and help a horse trailer on the side of the road. Horses are physical and emotional therapists. As a teen I can tell you when life seemed too much, my horse saved me. She knew my tears needed her loving touch. She listened and never walked away. For many years I have volunteered at a large community activity for persons with special needs. Watching a non-verbal child say horse while their parent or caregiver cries is powerful. The smiles and laughter as they ride or touch a horse is magic. Economic impact of horse ownership is big. I can tell you my horses support local businesses. Buying land, property taxes, feed, hay, supplements, maintain fences, barns, barn supplies, clothes, boots, take out meals, gas, vehicles and insurance are constant expenses. Vet bills just for health maintenance are high. Emergencies even more. Yes horse homes are dusty. So is any neighborhood on a private dirt road. A properly maintained compost pile no matter where it is on your property will smell on a hot summer day. So do fires in distant regions. Do we fine them for having trees? These complaints are like moving next to an airport and complaining about the planes. Or next to a pulp mill and expecting it to not smell. The county would be a better place by not making it more difficult for horse involvement. I feel you would have fewer emotional problems, substance abuse and crime if troubled youth and families connected with the heart of a horse. Make it easier to be responsible horse owners so we can continue to share these animals with those who need their services. These proposed changes are aiming at people to give up property and add high density expensive housing that our citizens can't afford. We don't have the roads, medical care or schools to support such housing.	--	Poulsbo	
9/24/2025	333	Lynn	SeEVERS	ABANDON ALL CHANGES FOR EQUESTRIAN PROPERTIES	--	Poulsbo	Washington
9/24/2025	334	Lynn	SeEVERS	I think this proposal and wrong. Serves no purpose other than to collect revenue causing hardship	--	Tracyton	Washington
9/24/2025	335	Angela	Schnell	Please abandon ALL zoning changes that would affect our boarding facilities in Kitsap County! What a detriment to this area to lose this gift!	--	Bremerton	Washington
9/24/2025	336	Kristi	Christman	Will the designation of a property as Agricultural Land be forced upon property owners and therefore limit or remove their development rights? Purchase of development rights (PDR) and transfer of development rights (TDR) are intended to be incentives for preservation. I am concerned that forced rezoning of land into an agricultural designation will be a work around to confiscate property. Redesignation needs to be voluntary.	--	Kingston	Washington
9/25/2025	337	Dave	Bomalaski	We attended the hiring for these changes on 9/23/2025. Thank you for hearing the concern the new draft code brings to our equine and farming facilities. Those are facilities that have supported the community since its generation over a century ago. The hearing brought forth additional questions. The presenter mentioned data was gathered. What data was gathered and was it posted for the community to review. There was also mention of working groups and interviews conducted. Who in the equine community was apart of these working groups and interviews. In addition, your website mentions surveys were completed, again who from the community were these serves sent? The survey does not include questions regarding equine inquiry. Notifications were also mentioned in the Engagement Plan, who was notified of these changes were completed? Email notifications to whom? And social medial? With the goal to solicit and receive broad participation. I don't think this happened. Lastly, there is mention of an equine working group. When was that initiated and whom was a part of that group?	--	Bremerton	Washington
9/25/2025	338	Kerina	Powell Mancuso	the proposed zoning changes that threaten to destroy our rural horse community. These new regulations would make it nearly impossible for horse facilities to operate, ending generations of agricultural tradition.	--	Bremerton	Washington
9/26/2025	339	jazmine	jeweline				

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9/26/2025	340	Monica	Newby	Requiring a cup for a rural horse business in a rural area creates a hardship for local taxpayers and small business. Not only is this cost prohibitive for the horse stable owners, but the county doesn't have the manpower to handle the permit process in a timely manner. The reputation of the DCD is one of constant delays and corruption aimed just to get people to pay permit fees and make it too costly to endure. Please don't do this to our neighbors who provide an important horse experience for people who can't afford to own their own horses. This business brings community together. We need this now more than ever. Please don't let this over regulation harm innocent, hard working people.	--	Port Orchard	
9/26/2025	341	Emily	Froula	I appreciate Kitsap County's effort to prioritize rural issues through the "Year of the Rural" initiative. As part of this process, I want to highlight the importance of supporting rural economic development alongside protecting rural character. Our rural communities depend on a mix of agriculture, forestry, small businesses, recreation, and tourism. By modernizing codes for agriculture, childcare, horse facilities, and home-based businesses, the County has the opportunity to reduce barriers that currently hold back rural entrepreneurs and families. Allowing flexibility for small-scale enterprises, while still respecting the landscape and community identity, will help sustain livelihoods and attract the next generation of rural residents. In addition, I urge the County to recognize the economic and community value of sports and recreation opportunities in rural areas. Ball fields, trails, equestrian facilities, and open space not only provide health and wellness benefits but also serve as hubs for tourism, local events, and family-friendly activities that bring revenue into rural communities. Supporting these amenities strengthens both quality of life and the local economy. At the same time, I urge the County to ensure that code updates and reclassification decisions do not unintentionally stifle rural innovation or discourage investment. Rural businesses often operate on tight margins, and overly restrictive zoning can make it harder for them to adapt to changing markets. Clear definitions, balanced standards, and fair pathways for landowners will provide the certainty needed to grow responsibly. Finally, rural economic development depends on infrastructure and services—safe roads, reliable broadband, access to childcare, and accessible recreation. I encourage the County to link the Year of the Rural policy updates with investments in these systems so that rural areas are not left behind. In short, a strong rural economy, preserved rural character, and robust recreation opportunities are not opposites—they are mutually reinforcing. With thoughtful policies, Kitsap County can protect what makes rural areas special while also ensuring that rural families, businesses, and communities can thrive.	--	Kingston	Washington
9/26/2025	342	Catheribe	Schwartz	From an ethics standpoint, it would seem a minimum expectation is that those planning commission members having ties to real estate, developers or commercial construction must recuse themselves from voting on the equine facilities code changes. They have a clear conflict of interest. They or their employer stand to benefit directly. Capricious enforcement of contrived complaints about noise, dust or inconvenience will harass people into selling their properties sooner rather than later. Forcing land sales, that those commissioners benefit from, directly or indirectly.	--	Bremerton	Washington
9/26/2025	343	Jason	Head	The proposed regulations on equestrian facilities is concerning to their continuing operations in Kitsap County. The permitting requirements for shows, clinics, symposiums, and competitions would put an unusual strain, both financially and time wise on organizations and clubs which are usually not for profit. Additionally, the property owners rarely make profit, if at all. It is of concern if equestrian activities are being singled out, or if other athletics ie. baseball, football, and soccer are subject to similar permits at more public venues. The afore mentioned equestrian activities have potential to bring in peripheral income to the county. Attendees generally are drawn through business corridors, bringing possible income to fuel stations, fast food establishments, coffee shops, grocery, and convenience stores. Longer engagements may also benefit hotels and restaurants. Said effects can be similar to the Kitsap County Fair, however on a monthly or even weekly basis. Another point of concern is the proposed hours of operation. It should be stated that equestrian facilities are not only athletic and sports facilities, but a home for livestock, and businesses I can think of no other regulations that restrict these three categories so extremely.	--	Port Orchard	Washington

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9/26/2025	344	Hilary	Gafford	Horses deserve to have a happy, healthy life, and these proposed rules make it impossible for business owners to keep them. These proposed changes would destroy affordable horse access for families in Kitsap but also dismantle the lifeline we've built for the animals. Please just abandon all zoning changes related to equestrian facilities. These prepared changes would devastate family businesses, render animals homeless, remove opportunities for families to enjoy horses (like horseback riding and equine therapy) while doing nothing for Kitsap county residents quality of life and the environment.	--	Silverdale	Washington
9/27/2025	345	Samuel	Hayden	RE: https://www.kitsap.gov/dcd/PEP%20Documents/YOTR%20Horse%20Facilities%20Draft%20Code%2009022025.pdf - I do not believe this is meant for conservation purposes, but rather to increase housing and remove livestock and equestrian estate. The Conservation District should be concerned about conservation, not manure storage close to a property line (which does not address the actual concern of it getting into a waterway). The proposed revisions don't even address light pollution, arguably more abhorrent than Kitsap County's obvious attempt at a cash grab through permitting restrictions..	--	Poulsbo	Washington
9/27/2025	346	Rachelena	Allen	Leave the zoning as is!!! nobody in the community wants this... To include non equestrians. This is absolutely ridiculous to even propose given the significant number of lives that will be impacted, not to mention it will entirely reshape the community. DONT DO IT!!!!!! If you care even the slightest about the people and the animals involved, you'll do the right thing and withdraw this ridiculous proposal.	--	BREMERTON	Washington
9/29/2025	347	Lys	Perhay	Do not change equestrian zoning requirements. They are already in rural areas. They do not need to be further limited.	--	BREMERTON	Washington
9/29/2025	348	Peggy	Reece	Please abandon all zoning changes related to equestrian facilities	--	Silverdale	Washington
9/30/2025	349	Deborah	Adair	I am the former President of a 501c3 Educational Nonprofit that worked to preserve convenient, affordable access to equestrian activities in the San Francisco Bay Area. We offered year round riding lessons, summer camps in cooperation with the YMCA, boarding for students' horses, schooling shows, and pony parties. As a volunteer-run organization, every cent went to taking care of the horses and paying rent, utilities, and insurance. Without the additional income from summer camps and parties, and generous donations from people who believed in our mission, it would have been impossible. Ultimately, our barn fell victim to development, like most other stables in the area before us. As written, the Equestrian Center Standards and Regulations would be impossible for most small-scale equestrian facilities to comply with. They would effectively eliminate opportunities for aspiring equestrians in Kitsap. The set back and visual screening requirements would be particularly onerous. You can't simply configure site usage around aesthetics, you have to take into account the topography, access to structures, arenas, and paddocks, and optimize the use of the available space. Ultimately, it means an equestrian facility would require significantly more acreage and severely limit the pool of viable properties. Barring lesson barns from hosting small-scale public and private events would eliminate an important promotional vehicle and auxiliary source of income, and rob students of the opportunity to experience what it's like to compete in a familiar, safe environment. While the conditional use permit requirements and process don't seem unreasonable on paper, in practice, they would prevent the establishment of new equestrian facilities in Kitsap County. Simply put, the return on the level of investment required isn't there. That will ultimately make rural properties less desirable and less valuable as agricultural land, and a target for development, as I saw happen in California. Moving back to the PNW was a longtime dream of mine, and one of the things that drew me to Kitsap County in particular was the rural nature and easy access to riding facilities. It saddens me to see local stables facing the same fate as the one I worked so hard to keep open.	--	Kingston	Washington
10/1/2025	350	Julie	Wood	Please abandon all zoning changes related to equestrian facilities. I've lived in Kitsap County for 50 + years. Stop pandering to the commercial developers and pay attention to the rural residents.	--	Bremerton	Washington
10/1/2025	351	Sharon	Price	I suggest abandoning all zoning changes related to equestrian facilities. In particular the zoning setback will eliminate the ability to have horses in properties under 5 acres. Kitsap has a strong history of rural/agricultural/equestrian properties. It would be a shame for that to go away. It's one of the things I love about this area.	--	Bainbridge Island	Washington
10/2/2025	352	Katie	Clark	Please abandon all zoning changes related to equestrian facilities. These are burdensome, unrealistic, and will be detrimental to our community!	--	Poulsbo	Washington

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				Dear Commissioners and Planning Staff, I am writing to you not only as a Kitsap resident but as someone who has seen firsthand how important horses, barns, and small farms are to the fabric of our rural life. Our County's own plan promises to "support traditional rural lifestyles and rural-based economies, including farming, horseback riding, and forestry." Yet the current draft of the equestrian code does the opposite—it places barriers in front of the very families, children, and small businesses who keep these traditions alive. Back in 2016, several sections of Chapter 17.455 were repealed. At that time, the County took away simple, flexible allowances that helped farms and equestrian facilities function without excessive red tape. Now, instead of restoring that common-sense framework, the 2025 draft brings it back with layers of costly and rigid requirements. The new language adds steep setbacks, expensive permits, and operational restrictions that make it nearly impossible for smaller barns to survive. For a child in 4H, a barn isn't just a building—it's a second home. For many veterans, horses are a source of healing and connection. For small family stables, these places are their livelihood, built over generations with care and sacrifice. If the new code moves forward, many of these barns will be pushed out, not because they don't serve the community, but because they can't meet unrealistic rules designed without them in mind. These changes risk turning Kitsap's equestrian life into something reserved only for the wealthy or the very large-scale operators. That is not what "protecting rural character" should mean. True rural character is diverse, it is accessible, and it is passed from one generation to the next through families, children, neighbors, and small businesses who make up our local horse community. I urge the County to rethink this proposal. Please choose a path that supports—not stifles—the farms and barns that already embody our rural identity. Bring back the spirit of the pre-2016 framework, when equestrian activities were encouraged, not burdened with obstacles. Thank you for listening to the voices of the people who live and work in rural Kitsap every day.	--	Port Orchard	Washington
10/2/2025	353	Lauren	Rogers				
10/3/2025	354	Erica	Marbet	I have emailed my comments as an attachment to HCleveland@kitsap.gov.	Attachment	Shelton	Washington
				I am writing to you today as a deeply concerned member of our Kitsap County equestrian community to strongly oppose the proposed equine facility code amendments. While I understand the County's intent may be to address land use concerns, these amendments would have devastating and irreversible consequences for the horse community, local families, and the rural character that makes Kitsap unique. As someone who participates in rodeo events such as barrel racing and flags, I rely on local arenas like Lazy K and Pioneer Performance Horses in Port Orchard. For me, and for many others balancing work and family life, the only feasible time to haul into these facilities is after 8 p.m., once my child is asleep. The proposed restrictions on operating hours make continued participation in these activities nearly impossible, shutting out working parents and their children from safe and structured equestrian opportunities. The so-called "grandfathering" clause offers no real protection. When current landowners pass on or sell their property, the equestrian use will vanish with them, leaving future generations unable to keep these spaces alive. In effect, this would end the tradition of equestrian properties and boarding facilities in our community within just a generation. Additionally, many existing sites simply cannot comply with requirements such as 200-foot setbacks for paddocks. These restrictions are not practical or achievable, and would amount to a slow but certain elimination of horse facilities. Adding costly new permits and regulatory hurdles on top of this only ensures that these properties will disappear—discouraging new owners and disheartening current stewards of our rural heritage. On the surface, these changes may look like an easy and convenient way to resolve disputes and open rural lands for development. But in the long term, they would erase the very essence of what Kitsap County has long been known for: its rural heritage, equestrian activities, and the family-centered traditions that bring neighbors together. Once gone, these spaces, experiences, and opportunities for children will not come back. I urge you to reject these proposed amendments in their entirety and to instead work with the equestrian community to find balanced solutions that protect both rural residents and the traditions that define Kitsap County. Our horse facilities are more than just businesses—they are gathering places, teaching spaces for kids, and living expressions of our county's heritage. Thank you for your time and for considering the voices of those who will be most affected by these changes.	--	Bremerton	Washington
10/5/2025	355	Leah	Knapp				

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10/7/2025	356	Colen	Corey	My suggestions for Equine Facilities is to develop maybe 3 different permits: #1 would be for small facilities supporting 1-10 horses total with at least 2 horses being boarded. The facility must provide a Farm plan from an independent company registered with Kitsap County. Cost of the Farm plan would be paid for by the Equine facility applying for the permit. The permit would allow for Boarding and personal training of people and horses. Commercial Public events, if the facility is adequate would require additional permits. Retail sales would be subject to completely different requirements and conditional use permits. Animal densities would be determined by land sustainability addressed in the Farm plan. Kitsap County would perform a review of the Farm plan and accept or reject the permit application. Fees should be a flat rate based on County hours to address the permits. #2 facility - medium size housing 1-30 total horses would be the same as a #1 facility except for the amount of horses and the cost of the permit. Facility #3 - large facility 1 to as many horses as the property can sustain in the Farm plan would be subject to the same restrictions as the #1 and #2 Facilities with the distinction that they are professional commercial facilities with clients hauling in for training and possibly multiple trainers and instructors using the facility for their own businesses and paying the property owners for use of the site. Commercial public events would be addressed in the Farm plan and only require notice to the county with no fee, much like a burning permit. Retail sales of products not produced on the Equine facility property, as well as warehousing, distributing and sales of products would be subject to full conditional use permits and considered separate from the Equine facility to protect the surrounding properties and rural Character of the area.	--	Silverdale	Washington
10/7/2025	357	Clifton	Peterson	CULTIVATING CHARACTER RELATIONSHIPS, AND JOY Formal Statement for the Public Record Re: Evidence of Collusion and Misuse of County Process — Demand to Cease Arbitrating Civil Matters and Uphold Constitutional Property Rights Submitted by: Clif Peterson ⁴ JOY Equine / JOY Inc. 650 SW Spruce Road Port Orchard WA 98367 Email: clif@joyinc.com Phone: 253-514-5588 Date: October 7th 2025 I. Introduction This statement is submitted for the public record to accompany and supplement the petition and documentation I have already provided to the Kitsap County Planning Commission and the Department of Community Development (DCD). I respectfully demand that the County immediately cease acting as arbitrator in private civil disputes, and that it uphold, defend, and protect the constitutional property rights of Kitsap County residents as guaranteed by both the Washington State and United States Constitutions. II. Summary of Records and Evidence Obtained Through a formal Public Records Act (RCW 42.56) request and the County's own publicly accessible files, I have reviewed and compiled multiple official records documenting a pattern of repeated and escalating complaints made by Colen and Joanne Corey against their neighbors, Alan and Ashley Dixon of ARD Ranch, located on Roundup Lane. The official County case reports show the following: Year- Case Number Summary 2023 – CC 23-00330 Complaint by Joanne Corey alleging stormwater and grading violations. County determined no violation, noting it was a private-road civil issue. Case closed. 2023 – CC 23-03645 Second complaint alleging increased horses, hay sales, and fire hazards. County determined no violation, citing lawful agricultural activity. Case closed. 2025 – CC 25-01871 Third complaint by Colen and Joanne Corey, alleging “commercial retail operation.” County staff including Scott Diener (Planning Manager) and County legal counsel became directly involved. Case remains open and under review. Despite two formal determinations of no violation, the same complainants repeatedly re-filed nearly identical allegations until County leadership and legal counsel became engaged — elevating what is clearly a neighbor dispute into a county-wide regulatory matter. III. Evidence of Collusion and Abuse of Process The timing, content, and handling of these complaints align directly with the draft equestrian facility code revisions currently before the Planning Commission. It is therefore reasonable to infer that the Coreys’ private complaints have influenced or catalyzed the County’s current code proposals, effectively weaponizing public resources to resolve a personal civil dispute. This is an inappropriate and unconstitutional use of governmental authority. The County is not a neighborhood arbitrator, nor is it empowered to legislate or enforce codes at the behest of private citizens seeking retribution against their neighbors. By acting upon and incorporating the narrative of these complaints into countywide policy proposals, Kitsap County has blurred the line between public governance and private influence, violating the principles of equal protection, due process, and fair administration. IV. Constitutional and Legal Foundation The Fifth and Fourteenth Amendments to the U.S. Constitution, and Article I, Section 16 of the Washington State Constitution, guarantee the right to own, use, enjoy, and dispose of private property.	--	Port Orchard	Washington

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10/7/2025	357	Clifton	Peterson	“Anything which destroys any of the elements of property, to that extent, destroys the property itself.” — Ackerman v. Port of Seattle, 55 Wn.2d 400 (1960) Further, under the Washington Right to Farm Act (RCW 7.48.300-320), agricultural and equestrian activities are explicitly protected from being declared nuisances or restricted due to shifting community standards. To impose regulatory burdens or restrictions stemming from personal grievances is a violation of those statutory protections and constitutes an unconstitutional “taking” without just compensation. V. Demand for Immediate Action Accordingly, I hereby demand on the record that Kitsap County: 1. DDefer all matters involving Roundup Lane and the ARD Ranch to private civil jurisdiction, as originally determined by the County in 2023. 2. CCease immediately all policy or enforcement actions arising from or influenced by private complaints by Colen or Joanne Corey. 3. WWithdraw the equestrian facility code revisions that were materially shaped or justified by these private disputes. 4. AAffirm and defend the constitutional rights of Kitsap County landowners, ensuring that property rights, agricultural uses, and rural livelihoods are protected from bureaucratic overreach. VI. Closing Statement The power resides within the people, not within unelected boards or bureaucratic offices. Our public servants are entrusted to serve the people, not to be manipulated by them. The residents of rural Kitsap County — horse owners, farmers, families, and youth mentors — stand united in defense of our constitutional, agricultural, and moral right to use and steward our land responsibly and freely. Respectfully Submitted with Resolve, Clif Peterson Founder & Chief Joy Officer, JOY Inc. JOY Equine Youth Mentorship Program 253-514-5588 ✉ clif@joyinc.com	--	Port Orchard	Washington
10/8/2025	358	Mariah	Fair	My name is Mariah, and I’m an instructor at True Horsemanship in Kingston. Our barn provides lessons, camps, and therapeutic sessions, offering the community affordable access to horses. Many of our horses were rescued from neglect, rehabilitated, and now serve as lesson and therapy partners — helping people heal as they themselves have healed. The proposed code changes would treat small community barns like major commercial businesses, requiring costly permits for basic activities such as riding lessons. Most barns, including ours, already operate on razor-thin margins; these added expenses would force many to close, taking away affordable access to horses and putting countless animals at risk. The paddock layout and visual screening requirements are unrealistic, disregarding natural terrain, wetlands, and privacy rights. These rules would make many existing facilities noncompliant. Even worse, local horse shows and clinics — the heart of our equestrian community — would be burdened by permits so expensive and time-consuming that small saddle clubs could no longer exist. It’s important to note that these sweeping regulations appear to stem from complaints about a single facility whose one-lane road already violates existing county code. Instead of enforcing current laws where problems exist, the county is punishing every compliant equestrian property. An Equestrian Work Group was created to pacify public concern; however, members of that group have made it clear that no progress is being made due to the Planning Commission’s unwillingness to be workable and blatant misrepresentation of participant comments. These proposals also violate the Washington State Right to Farm Act, which protects agricultural operations — including equestrian facilities — from restrictive ordinances that hinder normal farming practices. Please reconsider these changes and work with our community to preserve Kitsap’s rural and equestrian heritage. Sincerely, Mariah True Horsemanship – Kingston, WA	--	Kingston	Washington
10/8/2025	359	Karen	Badgley	How to ruin our rural culture. We don’t need more apartment buildings and small area houses. Just look at Bellevue and north Seattle.	--	Kingston	Washington

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10/8/2025	360	Tamara	Schlyper	Equestrian centers play a vital role in the life and economy of rural towns. These facilities not only preserve the agricultural traditions and open spaces that define rural living, but they also serve as gathering places where community members of all ages can connect through a shared love of horses. From local riding lessons and youth programs to therapeutic riding and 4-H activities, equestrian centers create opportunities for education, recreation, and personal growth that strengthen the social fabric of small-town life. Beyond their cultural value, horse facilities make significant contributions to local economies. They support feed and tack suppliers, veterinarians, farriers, trainers, and countless small businesses tied to the equine industry. Equestrian centers often draw visitors from surrounding areas for lessons, shows, and clinics, bringing tourism revenue and helping sustain rural economies that depend on agricultural and recreational ventures. The people who operate these facilities are small business owners, caretakers, and educators who dedicate long hours to ensure the health and safety of their animals while providing meaningful services to their communities. It is essential to recognize and support these equestrian facility owners and operators for their hard work, resilience, and passion. Maintaining a horse facility requires substantial time, resources, and dedication—especially as costs for feed, land, and labor continue to rise. By backing these individuals through patronage, community partnerships, and supportive local policies, we help preserve not only an important rural industry but also a way of life that fosters responsibility, empathy, and a deep connection to the natural world.	--	Poulsbo	Washington
10/8/2025	361	Betsy	Cooper	Regarding the R and R Chapter update: Agree with your presentation of a stand alone chapter and strongly agree with its affirmation of the concentration of housing in the UGA. Need to state that state that analysis shows that housing is already over allocated in Rural for next 20 years; that there remain many opportunities for new residential living in the current rurally zoned areas. Also strongly agree that all the language in all sections that rural must be protected from sprawl. Need to add more definitive strategy commitment for the County to undertake more Natural Resources mapping as the underpinning of resource protection strategies and definition of wildlife corridors. On page 19 'Industrial Stg BMPs should not be mentioned since fimber harvesting will not in the future be done by large industrial logging companies. This should be changed to Timber or logging BMPs. Regarding LAMIRDs, page 20/21 seems to indicate their businesses are to be focused only on rural businesses, however, at least in the North end these LIMIRDs are the result of past development and thus are hubs for all manner of commercial activities, needed for rural and UGAs alike. So that decription of what businesses are allowed there should be changed. On page 22, the definition of Evironmental Wildlife Corridors should include land areas as well. Also while beavers are called out, the need to call out amphibian upland area use around waterbodies should also be acknowledged. Thank you	--	Kingston WA	Washington
10/8/2025	362	Betsy	Cooper	Regarding APP - 1D 57 - Moran - due to the existing compliance issues on the land adjacent to this reclassification request,(Active enforcement matter Case #CC - 220108) and the multiple environmentally sensitive areas on that adjacent property and the property that is the subject of this reclassification, this land owner has demonstrated a strong potential to violate the needed protections so allowing more intense development on this property seems inappropriate.	--	Kingston WA	Washington
10/8/2025	363	Betsy	Cooper	in reviewing the description of use changes for the rural I do not see any mention of accommodating concert venues or indoor or outdoor entertainment. I understood this was being considered but I am disappointed not to see it listed. Also a review of the Title 17 use table appears to allow such activities only in a very limited way. I believe, with appropriate restrictions (time, parking requirements, reasonable noise codes at the property line, this use can be accomodated in many rural settings and can be a value-added economic use for farm or rural uses. It should be allowed in all rural zones. Also, when reviewing the Title 17 use table I did not see Georges Corner LIMIRD listed, why is that? It should be listed as all the rest.	--	Kingston WA	Washington

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10/8/2025	364	Betsy	Cooper	In addition to my earlier comments, I did not see in the drafts and figures that identify the mineral resources overlay. I want to be sure, since the importance of calling out all viable and available sand and gravel areas is highlighted in WAC 360-190-070 and is noted in this chapter, that the property owned by RAYonire/Raydient on Port Gamble Road but included as designated as a mineral resource. This is important since any rural uses should be aware of the potential for that area to be mined for sand and gravel (WAC 365-190-070.4a ..."must designated so that mineral deposits of long term signfiicance is not knowingly precluded." On page 9 it appears that there is discussion of allowing Performance Based Development in the Rural. this would be a significant change and it needs to be discussed future as to the consequences of its use to the character of other surrounding rural uses and rural residential. if not done sensitively it could significantly affect the enjoyment of rural lifestyle of others around such a rural cluster. page 16 What is the definition of Working Lands? page 21 - under the rural services and infrastructure Policy 12 - sanitary sewer service should be revised to state in some way that it is not available, until and unless failures of appropriate on-site septic systems have been determined. The way it is written now it seems that such service can be extended in the rural and it should not be. Such urban service levels should NOT be extended in the rural. And you chapter and the WAC says that in many places. Policy (4) Transit should be clarified to focus only on rural needs, not urban scheduling. Again, it is important to not supply urban services to rural areas because it can have the effect of leading to the slippery slope of call for sprawl development. I did not see any mention of the term Agrotourism. I would suggest it be mentioned as a viable rural business model and value-added use for many of the agricultural activities being supported by this rural chapter. thank you	--	Kingston WA	Washington
10/9/2025	365	Beth	Berglund	In addition to the proposed changes to the code, I suggest the following changes to the categorical use table for rural zones. Use # 318 (Racetrack) should be prohibited in all zones throughout rural North Kitsap.	--	Kingston	Washington
10/11/2025	366	Carherine	Schwartz	I oppose all the proposed code changes targeting equine facilities. I have lived with horses on my properties in rural areas of 4 different states. NEVER were anything resembling the Stalin era regulations Kitsap county is proposing, in play anywhere else I've lived. In those states; Equine operations were not singled out for punitive, burdensome regulations. Equine are livestock like cattle and other farm animals. No setback requirements for any aspect of an equine operation. No fee and permits No rules on hours of operation It's nothing more than slow motion confiscation of private property. That these code change proposals got as far as they have, that staff misrepresented their summary of comments submitted, and that staff continues to push them, calls into question their competency and ethics.	--	Bremerton	Washington
10/11/2025	367	Jan	Shandera	Because hay harvested in eastern Washington can be contaminated with the herbicide clopyralid, which passes through horses digestive tracts but remains in the manure, toxic to some plants, we think that manure should not only be kept 200 feet from boundaries, but also from any body of water, especially salmon bearing creeks..	--	Port Orchard	Washington
10/11/2025	368	Patricia	Wible	Proposed changes to equine regulations are too extreme and certainly without appropriate discussion and research. As proposed they are overly restrictive, vaguely written and would have a monterously negative impact on small farm management.	--	Port orchard	Washington
10/11/2025	369	Sharon	McAfee	I plead with our Kitsap County Commissioners to listen to the Equestrian owners in regard to the restrictions on their land use for Horse boarding, riding & trianing. This is something people love to do, like many other hobbies. Putting more restrictions on them, will limit those willing to "jump through the hoops" to maintain what they have or open any new Equestrian centers. Thank you for your consideration of this matter, please don't make things too complicated for these Citizens of Kitsap County. For your info, I do not have any horses, nor do I ride. Over my many years, I have known many who do so & appreciate their love of horses & providing enjoyment for others who may not have the property to do so.	--	Manchester	Washington
10/11/2025	370	Louis	Quill	Hello, I generally oppose the additional regulations in regards to horse facility and agricultural regulations. I feel like these additional regulations are overly broad, overly restrictive and unnecessary. The additional permitting, setback requirements and use restrictions are onerous and will result in reduced use and freedom to use the land that they own. Rural uses should remain broad and largely unrestricted. People who move to rural locations and expect to live a suburban lifestyle should not be allowed to control other peoples land use who own animals or use their land for agricultural uses.	--	Port Orchard	Washington

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10/13/2025	371	Nancy	Shurtleff	I am an owner of a farm in Poulsbo on which I have retired horses on a 5 acre parcel. I feel that my farm property adds significant visual appeal to the surrounding area, as do the properties of my neighbors. Sawdust Hill, like many other parts of the County, are beautiful, peaceful, pastoral; they epitomize RURAL. I keep 6 retired horses, 4 goats, and a lot of chickens on this property. If the new restrictions go into effect, particularly those requiring manure piles and fencing to be 200 ft from a property line, I would be unable to keep horses on the 5 acre parcel where 4 of them now live. Maybe I'll just have to develop the property, build a bunch of houses, and move on. Congratulations, Kitsap County! You now look just like King County. Problem solved, quality of life destroyed. The title "Year of the Rural" is a bit misleading at best. Also, my kids and I both grew up at riding stables. Our values are based on our relationships with horses and their people, embodying hard work and respect - for the animals we love, for the people who love and care for them, and for the land they live on. Where will we and our children go to learn these values if you make it so difficult for farms to survive in this already over-paved and over-built land we live in? Thank you for reading my comments.	--	Bainbridge Island	Washington
10/13/2025	372	Mary Beth	Miller	I am against all of the updates you are proposing to equestrian facilities. It's odd that in your "year of the rural" you are choosing to target and harm businesses that are quintessentially rural. It appears to me and to the people I've spoken with that you are targeting these businesses in the hopes that they will go out of business and sell their land to developers. It appears that this urge to develop the land is behind your proposed changes. They certainly don't benefit the stables or the many horse owners, myself included, who board at the stables. How do you figure you can enforce business hours on a facility that cares for large animals? Does this mean if a horse colics in the night, medical treatment can't be given until the following morning? If you proceed with your code changes, you will drive many of these stables out of business making it difficult if not impossible for horse owners to keep their horses. These businesses are a large part of the reason we relocated to Kitsap County. I think you need to be transparent in your reasons for these proposed changes and start thinking of ways to preserve the rural character you proclaim is important to this board. Right now, you look to be in the pocket of developers and rich home owners, which is shameful. Support your community and its needs instead.	--	Silverdale	Washington
10/13/2025	373	Natalie	Fincher	Thank you County Commissioners for postponing code changes to equestrian facilities. It is important to address the actual issues of concerned neighbors while not negatively affecting horse owners, we can work together.	--	Poulsbo	Washington
10/14/2025	374	Jane	Evanson	KCD approved a development north of my property. The owner/builder was approved to build a Hansen Pole Building 18 feet from an artesian spring and semi-annual stream on my property. He elevated his building pad with gravel and set his roof drainage pipes to empty into the now dry ravine. This stream fed Steele Creek at the fish passage that crosses under Brownsville Hwy. The loss of the spring has led to a 2+ drop across my land bordering the highway. In 2004 KCD came out to visit and told me to fence south of the stream to protect the water source. Now the County is responsible for loss of aquifers and destruction of a spring.	--	Bremerton	Washington
10/19/2025	375	Phoebe	Fulton	Please abandon all zoning changes related to equestrian facilities. The equestrian community cannot afford the proposed changes.	--	Bremerton	Washington
10/19/2025	376	Brenda	Oas	Please do not implement these onerous regulations that threaten the rural equestrian culture	--	Poulsbo	Washington
10/21/2025	377	Christie	Schultz	In regards to 200 ft buffer zones for riparian and downhill slopes near salmon streams; this is causing conflict in property rights all over the county, especially in the equine community. Is there some way this ecological mandate can be modified to allow for property owners to build a berm system to keep the water from running off and into creeks (causing them to be scoured and destroying any potential for salmon life.) There should be a way for us all to live here, yet still preserve the salmon industry and save water biomes. It especially hits agriculture hard, but it CAN be fixed with a little thought.	--	Tracyton	Washington
10/22/2025	378	Joanne	Corey	Ag code 17.360c.030 please reword to "protect all parcel owners that legally have sole use of road/easement for ingress/egress consent over use of there Private Road . Not just Easement Holders. Reasoning: there are landowners that do not own portions of a private road easement but have rights to have access as the only use of ingress/egress.	--	Silverdale	

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10/23/2025	379	Dave	Bomalaski	If small GMA nonconforming lots outside of the UGA are a community problem, contributing to sprawl, people have a choice not to live in those lots, not to invest their savings in those lots and not to be a part of the problem. It is immaterial if these lots are grandfathered or new, if we consider their current existence problematic “sprawl”. If they present ecological stress, strain community services with human density and take away from the “rural character”, then there should be proper mitigation imposed on these offending properties. The just solution is to tax or otherwise encumber these sub-5-acre properties with the community costs associated with their existence. It is not just to impose added burdens on other community properties that are in alignment with GMA standards and goals in compensation for these nonconforming lots.	--	Kingston	Washington
10/28/2025	380	Becky J	Elmore	Please remember to help Long Lake in South kitsap. Salmonberry creek inlet and Curley creek outlet both need to be cleaned. The South end is turning into a swamp and the whole lake is dealing with invasive weeds. Boats come from all over kitsap county for recreation here. It seems Long Lake has been neglected. Please help save this valuable resource.	--	Port Orchard	Washington
10/28/2025	381			Clarification/definition of Rural Commercial still lacking umbrellaed under “working agriculture “. These feed/forage commercially sold, retailed, distributed for Sale that is not grown on the location where it is being sold, marketed in, and distribute. Lacking regulations/permits for impact proposed road use, safety to surrounding rural landowners use of shared easements which does not support all property owners that have sole use of legal ingress/egress. Define use, impact, requirements and some kind of regulation to support all rural residential land owners to be able to be supported by the County when impacted negatively with safety and all that is under rural character/rural vision..	--		
10/28/2025	382	Leslie	Yuenger	Child Care Code Update - 17.415 #5 Neighbor notification to immediate adjoining property owners "and those who live directly/diagonally across the street from the proposed Family Child Care Provider, if any". As neighborhood traffic will increase and impact the local residents, notification shall include these property owners in close proximity.	--	Port Orchard	Washington
10/28/2025	383	Ron	Thomas	There are current code inconsistencies that do not reflect the recent legislation of SB 5471 (Chapter 386, Laws of 2025) authorizes counties to allow up to four units of middle housing per lot in unincorporated urban growth areas (UGAs), certain limited areas of more intensive rural development (LAMIRDs) where existing sewer service is available, and fully contained communities. Although the DCD site shows accurate zoning requirements https://www.kitsap.gov/dcd/Zoning Reference Guide/Suquamish Density and Dimensions tbl.pdf the footnote 17.420.060 (11.a .1) “ Minimum lot size: twenty-one thousand seven hundred eighty square feet.” precludes any application of this law that was passed with overwhelming approval of both state legislations. The suggested code changes need to include the details that are similar to the Poulsbo code: https://www.codepublishing.com/WA/Poulsbo/html/Poulsbo17/Poulsbo1765.html	--	Suquamish	Washington
10/30/2025	384	Eric	Smith	I do not support changes to the equestrian code. It is much too restrictive and would require extremely large parcels of land which are unaffordable and make it very difficult to have small neighborhood gathering places for shared riding experiences.	--	Indianola	Washington
10/30/2025	385	Lillian	Acevedo	As both a citizen and western rider in Kitsap County, the idea of limiting horse properties after decades of functional use is abhorrent. This county has plenty to worry about it- why go after law-abiding, tax paying, good-hearted people? The only excuse is that the city has a desire to further line the pockets of those with untouched acreage and avoid the wrath of a Karen or two. This entire update feels like a personal assault on rural citizens, one that will not be taken lightly. Back off our lands!	--	Bainbridge Island	Washington
10/31/2025	386	Parker	Smith	We cannot let these codes go into place, we as a community are already running out of space to do hobbies that people enjoy. People need these hobbies to stay happy and healthy and the community needs these bringing people in that spend money here.	--	Indianola	Washington
11/6/2025	387	Andrew	Shoemaker	I'm a resident of Kitsap for 14 years and a land/homeowner in the county for the last 3. I strongly support taking steps to prioritize natural, undeveloped landscapes in Kitsap while carefully finding ways to accomodate growth. This includes implimenting modern ecological forestry and agriculture principles into land use rules. As a region we must do better to protect these ecosystems- from advancing non-motorized transportation infrastructure to promoting regenerative agriculture and involving the community in caring about nature and regional growth. Thank you for your hard work.	--	Bremerton	Washington
11/6/2025	388	Katherine	Tertocho	I was born & raised in Kitsap County, and am now a homeowner here. I stand with Kitsap Environmental Coalition and their comments submitted on these topics. Protect wildlife corridors and habitats, critical areas, support nonmotorized transportation & local agriculture, and support best available science use. I also oppose the proposed reclassification requests and second KEC’s recommendations.	--	Poulsbo	Washington

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11/6/2025	389	Amanda	Dwyer	Please give habitat preservation the upmost priority in any comprehensive plan. Forests are our areas best defense against climate change. Their biodiversity is an incredible carbon sink and we need to be rewilding as much land as possible. Development needs to be focused in city limits.	--	Kingston	Washington
11/6/2025	390	Karen	Zengel	With new development, pls be conscientious of requiring developers to maintain a maximum number of original trees, wildlife pathways, and alternative traffic, water and utility mitigation. Housing and more business is a good thing, but needs to be done with much more careful planning than in the past! The new homes on Waaga Way are an example of reckless tree-cutting, bad traffic planning, and likely not affordable housing of the type really needed. We've had lots of wildlife escaping to our nearby neighborhood because of it!	--	Poulsbo	Washington
11/6/2025	391	Beverly	Parsons	The Kitsap Environmental Coalition submitted a memo yesterday addressed to the County Commissioners with comments on the R&RL chapter and reclassification request. The info didn't fit in the space here so it was submitted separately	Attachment	Hasville	Washington
11/7/2025	392	Richard	Koontz	Rural Character “Foster quiet surroundings, low traffic volumes, dark skies free of light pollution, and the natural sounds of rural life, while ensuring privacy and tranquility. “ Currently: Big Valley Road is a highly cherished stretch of rural landscapes dotted with old houses and farmsteads. It is a traditional route for bicycle events and individual joggers. Vehicular traffic in the past consisted mainly of private cars and trucks used by residents. The current speed limit is 40 mph, monitored by an electronic speed sensor that alerts drivers exceeding the limit. Actual speeds are often higher. It used to be a quiet valley, and at night had little to no light pollution save an occasional car. Google maps is now routing people off Highway 3 and onto Big Valley Road even when traffic on the 305 from Bond Road - Viking Avenue – Highway 3 stretch is not jammed. Morning, noon or late afternoon, Google Maps reveals the pleasing Big Valley Road Route is as fast as or faster than taking Highway 3 when heading north or south between the Hood Canal Bridge and Poulsbo. Although very few homes have been built in Big Valley in the past two decades, traffic has more than doubled. Often, strings of cars pass through. All of this additional traffic is caused by traffic delays at the Viking Avenue / 305 intersection that people are trying to avoid. Pending: The addition of 468 new residential units in the immediate area (The Oslo Bay Apartments) will generate traffic onto route 305 at Viking Road. This new traffic will increase the traffic jams on 305 between Bond Road and Highway 3 at all times of the day. Inevitably, the Big Valley route will become the preferred choice of travel. Proposal: Reduce the speed limit on Big Valley Road from 40 to 35 mph.	--	Poulsbo	Washington

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11/7/2025	393	Jessica	Bryant	Dear Scott Diener, The Washington Department of Fish and Wildlife (WDFW) is dedicated to preserving, protecting, and perpetuating the state's fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities. In recognition of our responsibilities, we submit the following comments on the October 2025 draft Rural and Resource Lands Element 2.0 for Kitsap County as part of the current periodic update under the Growth Management Act (GMA), acknowledging that other comments may be offered in the future. We strive to maintain contact throughout this update process and look forward to future engagement opportunities. - For the Rural Character Definition, WDFW suggests updating the language to, "Protect and connect wildlife corridors, fish and wildlife habitat and other critical areas, and ensure coexistence with wildlife, while supporting fire resilience, healthy ecosystems, and ecosystem services." Habitat connectivity is one of WDFW's main land use priorities and while our Agency does currently support this portion of Kitsap County's rural character definition, we believe it could be improved by including the connection aspect into this definition. Additionally, WDFW suggests adding in "ecosystem services" into this portion of the definition so that the benefits that the public enjoys as a result of natural processes and biological diversity found at these sites are recognized, consistent with RCW 76.09.020. - WDFW suggests updating the Rural and Resource Lands Policy 1.8 to, "Regularly evaluate conservation programs and educational initiatives to protect sensitive or resource lands while allowing development in appropriate locations, using tools such as Purchase of Development Rights (PDR), Transfer of Development Rights (TDR), and performance-based development (PBD) to balance conservation and growth. Explore ways to encourage environmental protection on priority properties through the use of these tools or the county or partners purchasing properties for permanent conservation.". WDFW encourages the County to expand this policy to explore ways to protect properties that have critical areas, locally important habitats, or wildlife corridors by using the tools currently covered in this policy or through the use of acquisition. For educational resources, please visit the Landscape Planning for Washington's Wildlife: Managing for Biodiversity in Developing Areas publication and the WDFW Habitat at Home program.	Attachment	Olympia	Washington
11/7/2025	393	Jessica	Bryant	WDFW suggests updating the Rural and Resource Lands Strategy 1.c to "Prepare a Rural Lands Analysis (RLA) which evaluates current status and future projections for the rural area regarding land use and development trends, land capacity, compatibility of neighboring land uses, availability and adequacy of rural infrastructure, urban/rural boundaries, locations of wildlife corridors and habitat connectivity locally and regionally, transfers and purchases of development rights, and other rural issues. The RLA should be updated regularly to inform periodic updates to the BLR and Comprehensive Plan.". WDFW encourages the County to explicitly state that both local and regional wildlife corridors and habitat connectivity are being taken into consideration to align with WAC 365-196-335. Improvements to habitat connectivity networks reduce habitat fragmentation and can reduce wildlife conflicts since wildlife have a movement corridor to avoid humans. For resources on these efforts, please visit the WDFW Priority Habitat and Species website and the Washington Habitat Connectivity Action Plan website for interactive maps and connection reports.	--	Olympia	Washington

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11/7/2025	393	Jessica	Bryant	•WDFW is supportive of the Rural and Resource Lands Policy 2.1. For protection on agricultural lands, WDFW suggests enrolling in the Voluntary Stewardship Program (VSP) to create a non-regulatory approach to meeting the goals of the state of Washington's Growth Management Act by protecting critical areas on agricultural lands. Enrollment is currently open to new counties. WDFW also suggests that the County consider exploring the Menu of Measures resource provided by the Department of Commerce regarding goals for forest management plans, forestland ownership, and preservation of long-term agriculture uses, recreation, open spaces with rural character. •WDFW suggests updating the Rural and Resources Lands Policy 13.1 to: "Recognize and value water as a necessary asset for agricultural uses, while balancing this resource as a critical environmental element to the natural ecosystem.". WDFW acknowledges that water is a necessary asset for agriculture, however, as written it may read as if water is not an asset otherwise. WDFW suggests expanding this policy that highlights that water is also a key element to critical areas and the natural ecosystems that rely on water. •WDFW suggests updating the Rural and Resources Lands Policy 13.3 to: "Coordinate with Kitsap Natural Resource Asset Management Project to develop and implement watershed plans.". WDFW encourages the County to explicitly include a statement that these plans should be implemented after they have been developed so that these plans continue to be used after development. Additionally, we suggest utilizing the Sound Choices Checklist in further review of all Comprehensive Plan elements. This checklist utilizes broad priorities that are applicable to all Puget Sound jurisdictions. Thank you for taking the time to consider our recommendations for your comprehensive plan to better reflect the best available science for fish and wildlife habitat and ecosystems. We value the relationship we have with your jurisdiction and the opportunity to work collaboratively with you throughout this periodic update cycle. If you have any questions, need our technical assistance or resources at any time during this process, please don't hesitate to contact me at 360-701-7705 or at Lindsay.Wourms@dfw.wa.gov, or Region 6's Regional Land Use Lead, Jessica Bryant, Jessica.Bryant@dfw.wa.gov.	--	Olympia	Washington
11/8/2025	394	Renee	Ziemann	I am a farmer in Kitsap County, and am eager to see the formation and seating of the Agricultural Advisory Council so that farmers can have a voice in decision making at the county level. Farmers are so important to this county's land stewardship, preserving its rural character, economic growth, and food security. I am also interested in seeing more protection for farmers from neighbors who do not know what to expect from farms (consider a "Guide to Rural Living" that educates non-ag neighbors about what to expect). Lastly, please prioritize strategies for preserving farmland, including small acreage farms.	--	Poulsbo	Washington

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11/8/2025	395	Stacy	Marshall	Submitting as the Public Outreach Lead on behalf of the Kitsap Farmland Preservation Coalition (https://preservekitsapfarms.org/). GENERAL COMMENTS: The Rural Chapter presents an opportunity for Kitsap County to establish goals and policies and implement strategies to support vibrant agriculture and forestry sectors and a robust, resilient and accessible local food system. To track progress towards these goals and keep the county, landowners and advocacy groups accountable the strategies must be stated. The Draft Rural Chapter as currently written lacks a robust suite of strategies to advance the goals and policies in the chapter. In particular, the Kitsap Farmland Preservation Coalition finds the dearth of strategies to preserve agricultural lands and support the local food system distressing and proposes the inclusion of strategies to promote and protect agricultural activities in the rural zones. We must proactively conserve agricultural and forested lands, and adopt innovative approaches to farmland beyond conservation easements, purchase and transfer of development rights to include mitigation measures for the loss of farm and forest land to development, incentives for landowners to conserve their land, and land access programs for new and beginning farmers. The 2024 Comprehensive Plan contains goals and policies promoting and supporting food in the land use and economic development chapters. See: Land Use Goal 8. Food security, systems, and production Promote food security, food systems, local food production, and public health by encouraging locally based food production, distribution, and choice and Economic Development Policy 5.5. Expand access to affordable healthy food and the community's capacity to produce, process, and distribute local foods. However, missing from these goals is the basic fact that without farms there is no food. Let us say that again. NO FARMS NO FOOD! Without sufficient effort in the coming years, guided by the goals, policies and strategies in the Rural Chapter of the Comprehensive Plan, Kitsap will continue to see conversion of working lands to non-agricultural uses and loss of farmland now producing food for our communities. We know these changes are irreversible – but they are not inevitable. To that end, the Rural Chapter must include additional policies and strategies with a laser focus on these issues. Rural Development Goal: Retain the rural character of the County outside of designated urban growth areas (UGAs). NEW Policy: Promote and support the preservation of agricultural lands and activities within the unincorporated areas of the county, and to make that position known to all citizens currently living in or intending to move into this area to address issues of land use compatibility Policy: Direct housing development and urban-type land uses, facilities, and services into UGAs. NEW Strategy: Prior to allowing a city annexation or urban growth area expansion, require completion of an agricultural impact statement that sufficiently addresses the concerns raised. Policy: Limit development in the rural area to appropriate rural uses not characterized by urban growth patterns or the need for urban-level services and facilities. Strategy. Review and revise as necessary standards and development regulations for the rural area to preserve rural character. NEW Strategy: Relieve the pressure to develop agricultural land by requiring cities to allow more options for in-fill housing, such as accessory dwelling units, duplexes, triplexes, and townhomes. NEW Strategy: Provide a separate website with agriculture specific practices and regulatory requirements with an emphasis on common agricultural practices vs. land disturbing activities. Strategy:	Attachment	Poulsbo	Washington
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11/9/2025	396	Nikki	Johanson	I have followed this County's history for more than 40 years ever since Trident was first announced in the 1975-1976 era. This county has been moving towards massive development ever since that was announced. The Bremerton Sun printed in its headlines that "farming was no longer considered to exist in Kitsap County". The County Commissioners were going along with that thinking when they didn't declare any agricultural zoning in Kitsap County in 1992, proving that they believed that past headline to be true. But the County certainly got my attention as an active agricultural family living here! I have followed the County's actions since early 1990's very closely. The Department of Community Development (DCD) has always added new things to the ongoing plans whenever the farmers come close to a solution to what's of concern to them. In 2016, Kitsap Community Agricultural Alliance (KCAA) with the support of others, got the Agriculture Codes adopted and that took 3 long years to achieve. Those new codes outlined the process to form an Ag Council. And we have been waiting another 10 years for the County to move forward with their promise to accomplish an active council. This time there's a problem with adding new entities to the table during in what they call the "YOTR". I am referring to the Agriculture Working Group Steering Committee. Farmers have been promoting an Agriculture Advisory Council made up of "agricultural practitioners" for more than 18 to 20 years and we want to follow other counties in the state and has an active and viable council functioning of our own. Six of the nine members possible members of the steering committee are not active farmers; so, who makes up the rules and guidance considerations? Indirect members of County and State paid staff, that's who! Now this new item has popped up: they purpose adding another input person that is a non-farmer, according to their notes (10/21/2025) of the steering committee. I predict this will cause a backspin on the whole process and delay this advisory council from happening in any timely fashion.	--	Silverdale	Washington
11/9/2025	397	Dolores	Nice-Siegenthaler	I'm concerned about the local food movement, food security and the ability for our local farmers to provide, in a meaningful way, for our community in the future and in times of urgency.	--	Poulsbo	Washington
11/9/2025	398	Patricia	Weagant	I am commenting on KEC's suggested edits to YOR. RURAL and RESOURCE Lands Chapter: Protect Critical Areas. Add "Quantity" It is important to identify water quantity as well as water quality and to locate, protect, and enhance water quantity using innovated, environmental sound technologies and practices. Especially, because of cutbacks to federal agencies that provide vital natural resource information to local governments. Motorized Transportation: Strategy 12.a Emphasize connecting communities to promote accessibility, safety and social cohesion. I was born and raised in Kitsap. As kids it was great to be able to explore the woods, bike and walk miles from home safely. Even in the seventies I could safely bike to work on our rural road. But the arrival of the freeway, Bangor, business along Wheaton Way, the Kitsap Mall, the population expansion in Poulsbo, Silverdale, Port Orchard, loss of agriculture and forest, an increase in crime it is harder to bike or walk without feeling your jeopardizing your well being. I support KEC volunteers and I am grateful for their hardwork to protect the well being of everyone without personal economic gain.	--	Poulsbo	Washington
11/9/2025	399	Matthew	Bone	We support KCAA comments. KCAA would like to focus on two issues of special significance to those involved in agricultural pursuits in Kitsap County. 1. Kitsap County still has not arrived at a workable way to provide any level of regulatory protection of any of the land in Kitsap County so that some land may be dedicated to long-term use as agricultural land. With the development pressure on county lands, this is of the utmost importance. 2. The county has promised an Ag Advisory Council for years. NOW is the time to hold the county's feet to the fire and make sure that an AAC is created with the purpose of (a) advising the county, and (b) that funding is allocated for a part-time staff person to coordinate its activities. The wording in the 60% document needs to reflect these priorities. More specifically; An effective Agriculture Advisory Council needs to be able to advise the County on matters of concern to the agricultural community. This will include code revisions and land use policies. An effective Agriculture Advisory Council needs to have adequate support staffing from the county, and a meeting schedule that allows for timely examination and recommendations on the issues impacting agriculture. An effective Agriculture Advisory Council needs to have representative membership from Ag community. In sum, there is a proposal in front of the Planning Commission on the creation of an AAC. The KCAA and our 460 members strongly support this proposal and urge the Planning Commission to recommend it to the County Commissioners.	--	Port Orchard	Washington

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11/9/2025	400	Ron	Perkerewicz	AGRICULTURE ADVISORY COUNCIL , as we move into the fourth-generation of trying to maintain our family farm at the corner of central valley Road and Highway 303 we feel that there is a need to have an agricultural advisory committee. I see agriculture as the land-use at risk similar to what happened to racetracks and other less desirable, in some peoples eyes, activities that have existed in certain areas and then population is moved in next to them through development such as our case with the 400+ homes on the property adjacent to us. The newbies then say they dislike the smell, noise and animal activities next to them and want them regulated or removed. We were here first and have worked very hard to maintain the property by putting in Agricultural open space and have a very environmentally responsible farm plan to protect the streams from pollution or effect of the animals. In addition to the potential new adjacent property owners we are now being affected by modernization of the highway and a large portion of our property may be lost to fish stream enhancement where the possibility of fish is extremely rare given that the county downstream of the enhancement cannot address the blockage. These are just a few of the things that threaten the remaining agricultural land in the county.the agricultural advisory Council would at least give a sounding board for regulations and collaborative solutions to problemshaving a very	--	Bremerton	Washington
11/10/2025	401	Justin	Domingus	Please consider implementing an Ag Advisory Council in Kitsap. Since we do not have Ag zoning this would be an effective and easy way for the county to get insight into how Ag can best be integrated into the community. Farms here help with food resiliency, habitat, and local jobs.	--	Kingston	Washington
11/10/2025	402	Bob	Geballe	The KCAA has several comments which are too long to be included here. We have sent them via email to Heather Cleveland. Please add them to the comment section.	Attachment	Poulsbo	Washington
11/10/2025	403	rebecca	slattery	Kitsap farms, though mostly small operations, are vitally important to our local economy and community, building local food resilience and significantly contributing to quality of life and rural character. We need an Ag Advisory Council, (with teeth!) and to adopt practical farmer-informed code updates prioritizing the unique needs of ag businesses in rural residential zones. It is critical at this juncture to provide meaningful protections for farms, not just lip service. Please require a periodic review and update of agricultural policies and regulations at minimum with every Comprehensive Plan cycle.	--	indianola	Washington
11/10/2025	404	Robin	Livingston	I'd like your to consider three key requests: 1. please create an agricultural advisory council authorized by the Board of County Commisioners. 2. Please add more strategies (e.g. farmland mitigation programs, value reduction options, and monetization of ecosystems services) to preserve farmland, particularly small acerage farms. 3. Please shift focus. We need new guidelines and protections for rural businesses and small farm landowners from unhelpful conflicts; support farmers and non-agricultural neighbors to find mutually agreeable resolutions to situations of competeing interests. This includes a shift from existing broad language such as "land use compatibility" and "don't annoy your non-farming neighbors." Perhaps use existing models as template/guidelines (such as Thurston and Multnomah Counties work in this area). Develop Kitsap websites and "Guide to Rural Living" than might serve to educate Kitsap Residents in rural zones about co-existing with agricultural practices. Thank you in advance for your work to develop, craft, and fine-tune details that preserve the beauty and functional excellence of Kitsap's wonderful harmony of developed and rural parts of our county community. Thanks for preserving/protecting small farmers, and nurturing the amazing benefits I and all county residents reap from a robust rural aspect to our county. Thank you for your diligent attention to these salient issues. Robin Marie Livingston	--	POULSBO	Washington
11/10/2025	405	Virgilio	Corral	As for agriculture in Kitsap, we need deliverables in the form of concrete strategies that will allow farmers to hold the county accountable for progress toward farmland preservation and recognizing farmers special needs in the face of neighbor complaints. Growing food locally benefits us all and should be supported and promoted at every opportunity. An Ag advisory committee whose voice will be heard, respected, and given real weight would be a great first step as would keeping the Ag community and citizen supporters informed of county proposals which affect our ability to grow, sell and purchase fresh local food. The time is now. Please lets help keep what farmland is left in Kitsap!	--	Indianola	Washington

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11/10/2025	406	Karissa	Holcombe	My name is Karissa Holcombe and I serve as Vice President of the Kitsap Community and Agricultural Alliance. However, tonight I'm speaking as an agricultural stakeholder. My husband Geno and I are co-owner operators of Happy Grounds Farm and Animal Sanctuary in Poulsbo. Since 2004, Kitsap's agricultural community has been waiting for the formation of an Agricultural Advisory Council — a unified voice by and for the farmers of this county. For twenty-one years, this has been discussed, referenced, and promised. The time has come to finally act. I respectfully request that by the end of 2025, the County provide a clear timeline for establishing this council — and that formation of the group occur within the next six months at the latest. Please hold yourselves accountable to the agricultural community by committing to a firm date. Thank you for your time and your attention to this long-overdue step.	--	Poulsbo	Washington
11/10/2025	407	Paisley	Gallagher	Agricultural land is the lifeblood of clean water, local food, and community resilience. Each year, more open space is developed, land prices rise, and it becomes increasingly difficult for farmers to acquire and sustain farmland. In Tacoma, there's a farmer who "farms" from front yards—patches of land that together make up her acreage for growing food and selling CSA shares. This shows how even small spaces can feed communities. We need to preserve land designated for agriculture until there is truly no viable option to do so. Once farmland is developed—like the area where the Silverdale Mall now stands—it can never return to its natural agricultural state. Farmers don't just grow food; they market it, sell it, store it, and carry the full burden of the work it takes to keep local food systems thriving. Whether it's a large field or a front yard, any space that can grow food adds to community health and food security. Victory gardens should be encouraged—grow food for yourself, your neighbors, and your community. Food banks often struggle to access fresh, local produce, and many nonprofits are working hard to close that gap. But if agricultural land becomes reserved only for those who can afford it, we lose both access and equity. Farming isn't cheap and it isn't easy—but it is one of the healthiest, most sustainable investments we can make for the future of Kitsap County. Even if the land isn't currently being farmed, we must preserve the possibility that it could—and should—be.	--	Port Orchard	Washington
11/10/2025	408	David	Pedersen	FOR THE RECORD. Page 13 of the Commissioner's preferred direction for the land use designation map, shows a very small area where Bond HY307 and Port Gamble Road HY104 meet at Streibels corner. The North West corner of the land is contaminated with MTBE'S as deep as 30 feet in area's which has already been submitted for the record. I would suggest that DCD designate a special color for area's such as this on the land use code matrix to eliminate further confusion regarding any feasibility studies needed to even consider this land for use, because of the CARA 1 land involved. The color matrix for this area should be the same for Page 13 and 15 but is not. Small but important, as land use color codes make it extremely difficult to determine if it is a Rural Commercial, Urban Medium Density, LAMRID Use 1 or 3. In addition I have and will be showing the interested party's in the future a Class A or Class 1 wellhead is located directly in the middle of this land covered by plywood and 12 to 13 yards of dirt, which will be shared with DCD, Code Enforcement, and the Commissioner's in the future as needed. In regards to KCC involving BESS projects and their noise, upgrading code to Washington state standards will need to be stronger than the state expectation's because of the endless use of ACUP in area's that are not meant to have any industrial use failure's that would contaminate water supply's.! DCD's survey clearly indicated 8.67 of 10 resident's want to keep North Kitsap County as RURAL as possible, especially the land use portion. Want to eliminate the push back from Contractor's, Developer's, the GMA,PSRC,KEC and Resident's, take time to consider what the end result is when failure occurs. Upgrading Code Enforcement should be mandatory.! The new Comp. plan will be useless without proper enforcement.! As KPUD say's	--	Port Gamble	Washington
11/10/2025	409	David	Pedersen	KPUD say's everything fails with time.!	--	Port Gamble	Washington
11/10/2025	410	Hannah	Orando Baldus	1. Seat the Ag Advisory Council. This is essential to helping support farmers, preserve farmland, and ultimately make good policy that will support Kitsap County for years to come. 2. CLEAR and DETAILED farmland preservation strategies in the rural chapter. We can't evaluate progress or keep Kitsap County accountable without it in writing! We need an ag overlay district, a strategic plan for agriculture and farmland preservation, and a commitment to seek/dedicate funding to preservation of working lands. 3. Support for our food system as an economic driver in Kitsap - No Farms, No Food.	--	Silverdale	Washington

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11/10/2025	411	Jessica	Rice	My first thought as I am going through these updates is that government is sure specific on telling individuals what they can and can't do with their property. We pay outrageous amounts in taxes as it is and now you are adding regulations that will make us pay for permits for something as simple as a shipping container? To have to ask permission and paying for a CUP to have something as simple as a shipping container or more than one heavy equipment machine on your property is ridiculous and honestly has zero to do with GMA. I think the government needs to remember that individuals can govern themselves when it comes to their property and can resolve disputes with neighbors without government telling them to. Any one with a moral compass is going to do that. You are adding way too much bureaucracy to this plan and making it extremely hard for individuals to pursue life and liberty on their land. You do not even mention individual property rights in the 2024 Comprehensive Plan. I think it boils down to trust. You do not trust the citizens of Kitsap County to do the right thing and support one another to make this place a beautiful place to live. We care about our land and animals. We don't need you to come in with permits and outrageous fees to regulate that. This has been shown with the shutdown. When government can't provide, we provide for each other. You are hurting citizens more than helping.	--	Port Orchard WA	Washington
11/10/2025	412	Alicia	Houston	Hello Commissioners, my name is Alicia Houston, and I'm the owner and grower behind Healer's Harvest, a small flower farm in Poulsbo. I'm also part of the Kitsap Farmland Preservation Coalition, and I want help ensure that Kitsap remains a place where local agriculture can thrive. I moved here to care for my grandfather — one of the first vendors at the Bainbridge Farmers Market. and through that experience, I learned how much local farms mean to our community's identity and resilience. Over the past few years, I've watched how hard it's become for new and small-scale farmers, especially those from historically excluded backgrounds, to access and sustain farmland. The barriers in our agricultural code make it difficult for people like me to expand, collaborate, and build long-term, sustainable operations that feed and beautify our community. That's why I'm here tonight to strongly support the creation of an Agricultural Advisory Council. We need a dedicated space where farmers, rural landowners, and community members can work together to shape policy that reflects real on-the-ground experience. An advisory council would help bridge the gap between policy and practice, protect farmland, and keep our food and flower systems rooted in local soil — not lost to development or red tape. Please commit to making this council a reality. Our rural lands are more than just open space — they're living classrooms, food sources, and healing places. Thank you.	--	Poulsbo	Washington
11/10/2025	413	Gail	Rase	I have a concern of Ch17.415.020 Accessory use or Structure A. One piece of heavy equipment may be stored. Many agricultural activities use multiple trucks, multiple haying equipment with specialized operations, motorized muck buckets etc. This A should be eliminated. I think about the tractor clubs and multiple heavy equipment on their property. Farm equipment is used multiple times with No definition. I feel that this code update should not be approved this year 2025 and tabled until the analysis which is scheduled to be completed in 2026 is completed. Second reason to delay approval is top wait until the Agricultural Advisory committee is formed and can begin its tasks to assist in this process. I am also concerned about an individual's property rights when the land is enrolled in the open space agricultural use program. (new 14.55.100 Right to Farm Part C.)	--	Bremerton	Washington
11/10/2025	414	Luke	Yoder	The agricultural community's primary request is to form an advisory council that can provide input on matters of interest to agriculture. This seems critical for a county that doesn't really even have an agricultural code, and needs to figure out how to develop food security, and preserve farmland.	--	Poulsbo	Washington

Year of Rural Comment Form

09/24/25-11/10/25

11/10/2025	415	Dawn	Oien	I'm here to speak in defense of Kitsap County's agricultural and equestrian community — the small farms, stables, and rural families who form the heart of our "Year of the Rural." In recent meetings important questions and concerns have been raised regarding the Year of the Rural, mostly that it reflects a familiar pattern — a regulatory solution in search of a problem. The majority of Kitsap's equestrian facilities already operate responsibly, following established best management practices, conservation plans, and state right-to-farm laws. These operations aren't industrial polluters or nuisance sites — they are local farms and stewards of open space. In fact, over the past two decades, our large parcels and working farms have declined by more than 50 percent. The answer to that trend isn't more red tape — it's smarter, balanced policy not new layers of conditional permits and arbitrary setbacks that will only address isolated cases of incompatibility. Other Western Washington counties like Pierce, Skagit, Whatcom — recognize equestrian activities as bona fide agriculture and allow them as a matter of right in rural zones. Kitsap should do the same. We can protect water quality and rural character without extensive regulation. The Year of the Rural should be about trust — trust in good agricultural practices, in landowners who care for their animals and their land, and in a county that values rural life as much as it values growth. I urge you to adopt reforms that reflect balance, not bias and policy that supports the people who keep our rural landscapes alive.	--	Port Orchard	Washington
11/10/2025	416	Kimberly	Vincent	These comments reflect the "Year of the Rural" meeting with the BOC on 11/10/25: 1. Child care in rural areas and equestrian facilities: these sound like disagreements between neighbors that should be settled among each other as opposed to the county getting involved and imposing regulations that violate the property rights of everyone. County officials have duties of more importance (like defending property rights guaranteed in the 5th and 14th amendment of the US Constitution) than to legislate nanny codes at the expense of property rights. My neighbors and I have always been able to resolve our issues of concern among ourselves without county intervention. One of my neighbors had horses for a number of years with a barn as well as a paddock that was directly adjacent to my property, and it was never an issue. The word "rural" (as in "Year of the Rural") is a broad term, but it has always, in the history of this country, included things like farms and livestock and all of the trappings that go along with them. The burden is on the people who move to rural areas to adapt, not the other way around. 2. In a broader sense, Imposing restrictions on future (or any) property owners infringe on the property rights of the current owners, as such restrictions decrease the land value. If I can't sell my property as I'm currently using it, then my property has effectively been devalued in that my buyer pool has likely become severely limited. No one would want to pay what I may have otherwise gotten for it if it's, in essence, worthless. 3. Clearly the "Year of the Rural" plan was written by individuals who aren't farmers, as the proposed codes demonstrate that the original authors did not have actual farming experience. Our government is "of the people, by the people and for the people"; clearly the response from the public referenced in the meeting indicates that "the people" were not involved in developing "The Year Of The Rural" plan. 4. Potential "Grandfathering" of agricultural land use--Kitsap county does not have a good track record in honoring land use which has been grandfathered, as demonstrated in the case of the Kitsap Rifle and Revolver club. The KRRC was grandfathered in its use as an operating rifle range in the 1990's; in actuality, however, this grandfathering has been denied to the KRRC. Any property owner who is under the impression (legally or otherwise) that their land use is or would be grandfathered under "The Year of the Rural", should heed the cautionary tale of the Kitsap Rifle and Revolver Club.	--	Olalla	Washington
11/10/2025	417	Kimberly	Van Cleave	In regard to Vision 2050 as the basis of the "Year of the Rural": Vision 2050 was sourced by the World Business Council for Sustainable Development, an arm of the United Nations; the 5th amendment of the US Constitution states, "no person shall...be deprived of liberty, or property, without due process of law, nor shall private property be taken for public use, without just compensation". Vision 2050 is a set of mandates imposed by foreign government; it is not US law. Furthermore, the US Constitution is the supreme law of the land and as such, overrides ANY arbitrary mandates imposed by foreign governments. It has zero validity or place in the governance of Kitsap County. The BOC are elected to defend the citizens from foreign government, not endorse arbitrary rule of foreign government over the citizens who elected them to defend their rights as guaranteed by the US Constitution.	--	Olalla	Washington

Year of Rural Comment Form

09/24/25-11/10/25

11/11/2025	418	Niki and Larry	Orando	1. Seat the Ag Advisory Council. This is essential to helping support farmers, preserve farmland, and ultimately make good policy that will support Kitsap County for years to come. 2. CLEAR and DETAILED farmland preservation strategies in the rural chapter. We can't evaluate progress or keep Kitsap County accountable without it in writing! We need an ag overlay district, a strategic plan for agriculture and farmland preservation, and a commitment to seek/dedicate funding to preservation of working lands. 3. Support for our food system as an economic driver in Kitsap - No Farms, No Food.	--	Silverdale	Washington
Submitted	ID	Name	Organization	Comment	Attachment		
10/23/2025	NA	Albert Allpress via Diane Fish	Kitsap Conservation District	See attachment	Attachment		
10/29/2025	NA	Tim Davis & Glen Hutchinson	KCAC	See attachment	Attachment		
10/30/2025	NA	Jeremy Anunson	Mason-Kitsap County Farm Bureau	See attachment	Attachment		
11/9/2025	NA	Doug Hayman	--	See attachment	Attachment		
11/10/2025	NA	Tim Trohimovich	FutureWise	See attachment	Attachment		
11/10/2025	NA	Rod Malcom	The Suquamish Tribe	See attachment	Attachment		
11/10/2025	NA	Marla Powers	Port Gamble Sklallam Tribe	See attachment	Attachments		

Attachments

Referenced in comment form – submitted via email due to formatting

Name	City	State	Postal Cod	Country	Commented	Comment
Katelyn Taylor	Kingston	WA	98346	United States	9/16/2025	"The proposed changes to the county code are absolutely ridiculous. All because of ONE persons CIVIL DISCOURSE with a barn owner in the County. This feels like a land/money grab and like the county is looking for a way to push out rural folks just trying to make a living."
Rainwater James	Belfair	WA	98528	United States	9/16/2025	"Stephanie C. James"
Ami drake	Tahuya	WA	98588	United States	9/16/2025	"After my stroke on 11-10-23 Buying our horse as made a huge difference in therapy for myself and helped my teenage daughter in so many ways. Including joining the high school WAHSET team . Without the facility we have to board at , we would loose the horse that has brought so much happiness and therapy to us . Please no changes."
Nicole Hafner	Bremerton	WA	98312	United States	9/16/2025	"Horses have provided three generations of my family with structure, discipline, and invaluable mental, emotional, and physical support. Through them, we’ve found personal growth, healing, and community. In many ways, horses and the programs built around them have truly helped save our lives and our sanity. That’s why it’s so discouraging to see barriers being put in place that make it harder for families like mine to continue benefiting from these programs. The value of horses and equestrian communities cannot be reduced to money alone. They provide stability, wellness, and development that extend far beyond financial measures. I ask that we remember what is really at stake here: the well-being of individuals, families, and communities. Protecting access to these opportunities is not just about preserving a tradition—it’s about safeguarding a proven source of growth, resilience, and support for generations to come."
Jordan Banks	Gig Harbor	WA	98335	United States	9/16/2025	"I grew up in rural Kitsap County and getting to have horses and learn about their care, how to ride and all of the many aspects of horse ownership shaped me into the strong, yet sensitive and caring woman I am today. I now teach others the same skills I learned as a child and beyond as a horse trainer, riding instructor and barn manager. All because of horses. The value horses bring to a community far exceed any “inconveniences” and their presence is honestly needed now more than ever in an increasingly digital world. Getting your feet grounded in the actual dirt next to your equine companion not only teaches you who you are at your core, it also develops empathy for others, and it helps calm and ground our souls in this ever chaotic landscape of a world we are living in now. Horses have a grounding essence and anyone fortunate enough to truly connect with a horse will never question their value or role in our society. Please help keep horses a treasured part of childhood and part of what keeps adults young at heart! Also where are all the horses going to go if these proposals gets approved. Do you know how many horses will become homeless if current facilities and private homes are no longer able to keep horses or able to afford to keep them? I don’t know the number either, but I can assure you it will be an expansive new problem you were not anticipating. Barn owners are already operating at a loss and they do it because they love horses. Add more fees however and not many are going to survive it. Horses are woven into our history and the fabric of a rural life. Many many people move to rural communities in order to live with horses and sustain a financially modest but soulfully rich life with horses by their side. So many work hard to realize the dream of this rural lifestyle with horses... 🙏🏻🙏🏻🙏🏻 please don’t take their freedom to do so away. Respectfully and God Bless..."
Susie Howes	Kingston	WA	98346	United States	9/16/2025	"My family has lived in Hansville since the 40’s. Horses have been a major part of Hansville’s culture since then. My father used his teams to log and slip scoop sand to clear sand from the fishing boat tracks amongst many other jobs. We have volunteered for decades (actually doing jobs prior to trails being named and having organized overseers) many trail jobs county wide, using both draft horse and mule teams as well as pack strings and single horses to construct and maintain numerous trail systems county wide. There is even a plaque on Bainbridge honoring him and his team for their help with Bainbridge’s trail systems. He has hauled dignitaries into the Rodeo and through many parades. He volunteered his team and wagon giving hayrides at Corey’s Day on the Farm for decades. I grew up riding my Shetland pony all over Hansville. I still ride my horse all over Hansville. Ive volunteered for decades with the Back Country Horseman, 4-H and The Hansville Greenway. My daughter grew up doing the same. What the county is proposing is wrong. Horses are a major part of Kitsap’s culture. This special way of life should be cherished and protected! How dare them for trying to turn Kitsap into another city/ suburb as those on the East side of the Sound. Ive been sickened since hearing about the county’s current actions."
Jeanne Toulon	Kalaheo	HI	96741	United States	9/16/2025	"If this started because a new person bought a piece of property and moved into the area, this is truly idiotic. Surely she knew about its rural and heavily equestrian areas. She obviously didn’t do her due diligence and that’s her problem. This shouldn’t affect the old timers and they should be grandfathered in. It’s totally amazing that it has gone this far."

Name	City	State	Postal Cod	Country	Commented	Comment
Crystal Hart	Poulsbo	WA	98370	United States	9/16/2025	"Our horses and livestock are a vital part of rural Kitsap County, and they deserve protection. We need code that supports and safeguards our equine friends and rural way of life. It should never be the case that someone moves in next to a farm, ranch, or horse business — and then tries to push that operation out because they don't like the sounds, smells, or sights of animals. If you choose to buy property next to farmland, you should expect farming and livestock. That's part of what makes our county unique and vibrant. Our horses support small businesses here too — veterinarians, farriers, feed stores, trainers, and barns. When you limit horses, you hurt local families and the local economy. More importantly, you hurt our kids, our traditions, and the sense of freedom and connection that comes with riding and caring for these animals. We should not be regulated out of the ability to keep horses and livestock on our land. These proposed changes threaten to do exactly that, stripping away traditions, livelihoods, and opportunities for families, kids, and the community. Kitsap County should be protecting and encouraging the rural lifestyle that makes this place special, not regulating it out of existence. Please stand with horse owners and preserve our right to keep horses on our land."
Tracy Abbott	Seattle	WA	98125	United States	9/16/2025	"I have a small hobby farm with two ponies for me and my grandkids this would destroy my grandkids if they had to get rid of there ponies this teaches me that they don't matter all because one person can't fallow the rules why hurt everybody else. Sad. Sad. Sad"
Nina Halvorson	Olalla	WA	98359	United States	9/16/2025	"I lived in kitsap my entire life. While I now have relocated, having the ability to not only ride horses but then have them at home was an absolute dream come true. I then was able to build a business and share horses with others. If the county takes even more rights away from homeowners, the equine community is not only at stake but our inherent rights as property owners. There's already so much regulation, adding more because of ONE complaint is seriously going to drive out freedom from the people but also they too will choose to leave the county and or state."
Jasmine Sullivan	Seabeck	WA	98380	United States	9/17/2025	"I am a sixteen year old 4-Her and U own two horses who are members of the 4-H community. If the county passes this it will effect all horse and livestock owners. The livestock and horses are a big contributing part of Kitsap County bringing many tourists to view and experience these animals and the events. With the many regulations that are already in effect, these will make it almost impossible to own or lease horses. This will lead to the destruction and demolition of the community and culture that Kitsap County is known and loved for. Please stand with us so we can support future generations in this dream and make this experience accessible for all."
Cassandea Hall	Milton	WA	98354	United States	9/17/2025	"The rule changes will ruin small farms in businesses. When you push small farms and businesses out, no one wins."
Nick Balera	Tacoma	WA	98407	United States	9/17/2025	"Think about the impact you're actually causing. Laws are made to protect and serve the people - but when they instead do the opposite - bring harm and difficulty for the operation and financial wellbeing of the community this no longer becomes something of help, use and benefit. Why the need for change all of the sudden, why the need to have unnecessary control and additional costs attached. This state is constantly adding costs and taxes and fees onto everything making it harder each year for people to afford to live here. Care about your community, think about the people and do what's best for those who you're looking for impact."
Robert McGee	Port Orchard	WA	98366	United States	9/17/2025	"I may not own horses myself, but I stand in support with Kitsap's equestrian community because these proposed code changes threaten their rural way of life, small farms, and youth programs that make this county unique. Responsible horse owners have been part of Kitsap for generations, and this ordinance represents government overreach that could regulate them out of existence. This is not just about horses — it's about protecting rural heritage, family farms, and community programs like 4-H and therapeutic riding that benefit us all. Blanket 200-foot setbacks and costly permits will shut down small farms; what we need are balanced, science-based solutions that protect the environment without destroying rural character."
Sierra Silvernale	Port Orchard	WA	98367	United States	9/17/2025	"We should care about not taking the horse community out completely. We grew up western so did our parents, grandparents and great grandparents. Horses are best friends, a team mate, and loyal companions. Think back on time; how did people get around. So please think about this."

Name	City	State	Postal Cod	Country	Commented	Comment
Brandon Greenhill	Port Orchard	WA	98367	United States	9/18/2025	"Remember this: our state is allowing crime to run rampant, and this county is doing no better. We, the people, have constitutionally protected rights to control what happens on our own property — not the government. Under the Fifth and Fourteenth Amendments to the U.S. Constitution, no government can deprive a person of life, liberty, or property without due process of law. Article I, Section 16 of our state constitution guarantees the right to own and enjoy property, and protects citizens from unlawful takings. If this county refuses to listen to the voices of its citizens, then I say we take lawful action. Every person on this petition should consult an attorney and explore a class action lawsuit against the county for violations of our rights. Counties are political subdivisions funded by our tax dollars — dollars that, by law, must be spent transparently and for the public good (see RCW 84.52.050 on lawful taxation and expenditure in Washington). This is the same county that gladly takes our hard-earned money through taxation, while failing to uphold its duty to protect public safety and property rights. That ends now. It's time to stand up and stand strong. If they come after us, we will respond — not with anger, but with law, unity, and overwhelming resolve. We will come back 100 times stronger, and we will hold every decision-maker accountable under the law."
Russell Robinson	Chico	CA	95928	United States	9/19/2025	"#NoMoreCorruption"
Angela McKee	University Place	WA	98467	United States	9/19/2025	"Our family started with my son taking lessons with a 4-H family at a local farm in Kitsap County. Then we joined 4-H, an educational program where the animal is the conduit for learning. Over our 8 years in 4-H, my son grew from a distracted little kid to become a responsible, respectful and kind young man. Doing club group activities with the horses at different local farms and trail systems on the Kitsap peninsula and nearby Key Peninsula is a critical element to 4-H. 4-H and other programs such as WASET in the high-schools, local pony clubs, equestrian vaulting and other local events are what keep these educational programs affordable and within reach of our rural young people. Limiting these fundamentally rural opportunities by the proposed zoning changes for family farms with horses would effectively kill these programs in Kitsap County and set dangerous precedent for all remaining rural areas in the Puget Sound area."

Petition to Protect Rural Property Rights & Equine Facilities in Kitsap County

****Petition to Protect Rural Property Rights & Equine Facilities in Kitsap County****

To: Kitsap County Planning Commission and Department of Community Development

We, the undersigned residents, landowners, and supporters of rural Kitsap County, hereby petition the County to immediately and permanently withdraw the proposed horse facilities code revisions.

****Our Concern**** The proposed revisions would: - Require expensive Conditional Use Permits (CUPs) for normal, long-standing equine activities like boarding, lessons, and clinics. - Impose 200-foot setbacks that would make equestrian use physically impossible on many small rural properties. - Treat families, 4-H programs, and mentorship operations as if they were industrial facilities rather than community assets. - Create an undue financial burden on a sector that already operates on thin margins or at a loss while serving youth and families.

****Our Constitutional Rights**** Property ownership is protected by both the U.S. Constitution and the Washington State Constitution. The Supreme Court has consistently affirmed that government cannot strip away the right to use, enjoy, and exclude others from private property without due process and just compensation.

The Washington Right to Farm Act (RCW 7.48.300-.320) further protects agricultural and equestrian activities from being treated as nuisances. These proposed code revisions directly conflict with that law.

****Our Community Impact**** If adopted, these revisions will: - Force small farms and equestrian facilities out of operation. - Eliminate youth mentorship programs like those offered by JOY Equine, which instill character, responsibility, and hope in the next generation. - Strip away a way of life that defines Kitsap County's culture, economy, and rural heritage.

This is not preservation of rural character — it is the destruction of it.

****Our Demand**** We demand that Kitsap County: - Stand down and eliminate the proposed horse facilities code revisions in their entirety. - Respect and protect the constitutional property rights of all rural landowners. - Support, not hinder, equestrian and agricultural families who contribute to the fabric of our community.

****Now is the Time to Act**** We will not accept unconstitutional overreach. We call on the County to reject these harmful revisions and instead work with landowners, farmers, and horse facilities to preserve our rights, our heritage, and our future.

Total Signatures: 1031

No.	Name	City	State	Postal Code	Country	Signed On
1	Clif Peterson				United States	2025-09-15
2	Mariah Fair	Kingston	WA	98346	United States	2025-09-15
3	Kelli Talent	Port Orchard	WA	98367	United States	2025-09-15

No.	Name	City	State	Postal Code	Country	Signed On
4	Keri Peterson	Port Orchard	WA	98367	United States	2025-09-15
5	Stephanie Osterday	Poulsbo	WA	98370	United States	2025-09-15
6	Hannah Peterson	Port Orchard	WA	98366	United States	2025-09-15
7	John Siegrist	Port Orchard	WA	98367	United States	2025-09-15
8	Caden Rosas	Port Orchard	WA	98366	United States	2025-09-15
9	Ryland Rosas	Port Orchard	WA	98366	United States	2025-09-15
10	Stacy Rupp	Silverdale	WA	98383	United States	2025-09-15
11	Amber Longworth	Poulsbo	WA	98370	United States	2025-09-15
12	Noellani Karry	Kingston	WA	98346	United States	2025-09-15
13	Tami Berry	Poulsbo	WA	98370	United States	2025-09-15
14	Kris Daily	Seabeck	WA	98380	United States	2025-09-15
15	Jordan Miller	Boring	OR	97009	United States	2025-09-15
16	Trina Rhoton	Port Orchard	WA	98367	United States	2025-09-15
17	Jessica Nold	Poulsbo	WA	98370	United States	2025-09-15
18	Judah Peterson	Port Orchard	WA	98367	United States	2025-09-15
19	Jodi Dickey	Port Orchard	WA	98366	United States	2025-09-16
20	Gregory Gill	Tygh Valley	OR	97063	United States	2025-09-16
21	Kimberly Wilson	Port Orchard	WA	98367	United States	2025-09-16
22	Shanna Fogelman	Port Orchard	WA	98366	United States	2025-09-16
23	Hudson Hall	Port Orchard	WA	98367	United States	2025-09-16
24	Sadie White	Silverdale	WA	98383	United States	2025-09-16
25	Thomas Erickson	Gig Harbor	WA	98329	United States	2025-09-16
26	Katelyn Taylor	Kingston	WA	98346	United States	2025-09-16
27	Marcia Adams	Shelton	WA	98584	United States	2025-09-16
28	K Goss	Port Orchard	WA	98367	United States	2025-09-16
29	Pamela George	Bremerton	WA	98310	United States	2025-09-16
30	Nicole Carter	Tahuya	WA	98588	United States	2025-09-16
31	Andeara Purdy-Hohn	Silverdale	WA	98383	United States	2025-09-16
32	Kristen K. Manweiler	Port Orchard	WA	98367	United States	2025-09-16
33	Allison Hartman	Bremerton	WA	98312	United States	2025-09-16
34	Rachel Edwards	Port Orchard	WA	98366	United States	2025-09-16
35	Valerie Seamans	Bremerton	WA	98312	United States	2025-09-16
36	Michel Stump	Port Orchard	WA	98367	United States	2025-09-16
37	Kimberly McClure	Belfair	WA	98528	United States	2025-09-16

No.	Name	City	State	Postal Code	Country	Signed On
38	Oliver Ayers	Port Orchard	WA	98367	United States	2025-09-16
39	Kaya Berry	Poulsbo	WA	98370	United States	2025-09-16
40	Ashley Dixon	Silverdale	WA	98383	United States	2025-09-16
41	Rainwater James	Belfair	WA	98528	United States	2025-09-16
42	Michael Paddock	Poulsbo	WA	98370	United States	2025-09-16
43	Roy Eiss	Port Orchard	WA	98367	United States	2025-09-16
44	Aubree Caddock	Port Orchard	WA	98367	United States	2025-09-16
45	Steven Christensen	Silverdale	WA	98383	United States	2025-09-16
46	Ashlynn Clemo	Tahuya	WA	98588	United States	2025-09-16
47	Kara Walter	Gig Harbor	WA	98329	United States	2025-09-16
48	Stephanie Fleck	Bremerton	WA	98311	United States	2025-09-16
49	Ami drake	Tahuya	WA	98588	United States	2025-09-16
50	Erica Morse	Port Orchard	WA	98367	United States	2025-09-16
51	Julie Ruzanka Toulon	Olalla	WA	98359	United States	2025-09-16
52	Deborah Howard	Port Orchard	WA	98366	United States	2025-09-16
53	Michele Anderson	Shelton	WA	98584	United States	2025-09-16
54	Gail Howley	Seabeck	WA	98380	United States	2025-09-16
55	Briar Crow	Poulsbo	WA	98370	United States	2025-09-16
56	Kimberlee Foley	Chicago	IL	60602	United States	2025-09-16
57	Teresa Floyd	Port Orchard	WA	98367	United States	2025-09-16
58	Micky Markham	Gig Harbor	WA	98329	United States	2025-09-16
59	Anna Carter	Silverdale	WA	98383	United States	2025-09-16
60	Joshua Felt	Gig Harbor	WA	98335	United States	2025-09-16
61	Colrain Fragoso	Port Orchard	WA	98367	United States	2025-09-16
62	Liza Johnson	Gig Harbor	WA	98329	United States	2025-09-16
63	Sabrina Duncan	Gig Harbor	WA	98332	United States	2025-09-16
64	Brie Youngker	Bremerton	WA	98312	United States	2025-09-16
65	Justin Toulon	Olalla	WA	98359	United States	2025-09-16
66	Dawn Felt	Gig Harbor	WA	98335	United States	2025-09-16
67	Tiea Christensen	Silverdale	WA	98383	United States	2025-09-16
68	Dana Johnson	Belfair	WA	98528	United States	2025-09-16
69	Kara Norsworthy	Lynnwood	WA	98037	United States	2025-09-16
70	Thomas Howe	Gig Harbor	WA	98329	United States	2025-09-16
71	Sarah Felt	Gig Harbor	WA	98335	United States	2025-09-16

No.	Name	City	State	Postal Code	Country	Signed On
72	Kimberli Eisses	Poulsbo	WA	98370	United States	2025-09-16
73	William White	Montesano	WA	98563	United States	2025-09-16
74	Nataley Fidler	Poulsbo	WA	98370	United States	2025-09-16
75	Angie Hall	Port Orchard	WA	98367	United States	2025-09-16
76	Lexi Bohlmann	Belfair	WA	98528	United States	2025-09-16
77	Patrick Hastings	Pearl City	HI	96782	United States	2025-09-16
78	Melinda Decoste	Poulsbo	WA	98370	United States	2025-09-16
79	Peter Crabtree	Kingston	WA	98346	United States	2025-09-16
80	Thelma Bratlien	Olalla	WA	98359	United States	2025-09-16
81	Jeniffer Moncief	Home	WA	98349	United States	2025-09-16
82	Rylee Hofbauer	Renton	WA	98058	United States	2025-09-16
83	Pamela Gordon	Olalla	WA	98359	United States	2025-09-16
84	Alexandra Nachreiner	Port Orchard	WA	98367	United States	2025-09-16
85	Erica Pollan	Fox Island	WA	98333	United States	2025-09-16
86	Shiloah Avery	Port Orchard	WA	98367	United States	2025-09-16
87	Paul Plattsmier	Poulsbo	WA	98370	United States	2025-09-16
88	Vera Demick	Seabeck	WA	98380	United States	2025-09-16
89	Danielle Dowell	Poulsbo	WA	98370	United States	2025-09-16
90	Shannon Leeman	Seabeck	WA	98380	United States	2025-09-16
91	Caroline Bivens	Port Orchard	WA	98116	United States	2025-09-16
92	Sharon Little	Silverdale	WA	98383	United States	2025-09-16
93	Breanne Little	Bremerton	WA	98312	United States	2025-09-16
94	Alishia Yeager	Port Orchard	WA	98366	United States	2025-09-16
95	Julie Throckmorton	Poulsbo	WA	98370	United States	2025-09-16
96	Robert Gomez	Poulsbo	WA	98370	United States	2025-09-16
97	Christopher Nachreiner	Port Orchard	WA	98367	United States	2025-09-16
98	Alex Jacobson	Poulsbo	WA	98370	United States	2025-09-16
99	Tracy Hague	Seabeck	WA	98380	United States	2025-09-16
100	artemia settle	Shelton	WA	98584	United States	2025-09-16
101	Patricia Tougas	Poulsbo	WA	98370	United States	2025-09-16
102	Kathy Richardson	Gig Harbor	WA	98335	United States	2025-09-16
103	Linda Pratt	Kingston	WA	98346	United States	2025-09-16
104	Joanna Seelye	Sequim	WA	98382	United States	2025-09-16
105	Elizabeth Kettle	Silverdale	WA	98383	United States	2025-09-16

No.	Name	City	State	Postal Code	Country	Signed On
106	Tori Edwards	Bremerton	WA	98311	United States	2025-09-16
107	Sandra Bell	Port Orchard	WA	98367	United States	2025-09-16
108	Sunnie Merritt	Gig Harbor	WA	98335	United States	2025-09-16
109	Brad Karry	Kingston	WA	98346	United States	2025-09-16
110	Brynn Schraw	Port Orchard	WA	98366	United States	2025-09-16
111	Korey Jones	Tahuya	WA	98588	United States	2025-09-16
112	Rikki Davenport	Port Orchard	WA	98367	United States	2025-09-16
113	BRITTANY Anderson	Poulsbo	WA	98370	United States	2025-09-16
114	Julie A Gelderman	Poulsbo	WA	98370	United States	2025-09-16
115	Kylie Beckey	Bremerton	WA	98312	United States	2025-09-16
116	Brittany Burns	Hansville	WA	98340	United States	2025-09-16
117	Cheryln Morrell	Bremerton	WA	98311	United States	2025-09-16
118	Amanda Dominguez	Gig Harbor	WA	98332	United States	2025-09-16
119	Anastasia Bale	Poulsbo	WA	98370	United States	2025-09-16
120	C. Mickey Centeno	Seabeck	WA	98380	United States	2025-09-16
121	Patricia Murphy	Auburn	WA	98092	United States	2025-09-16
122	Meghan Cuscuna	Port Orchard	WA	98367	United States	2025-09-16
123	Mike Fisher	Bainbridge Island	WA	98110	United States	2025-09-16
124	Jessica Fraley	Port Orchard	WA	98367	United States	2025-09-16
125	Jordan Banks	Gig Harbor	WA	98335	United States	2025-09-16
126	Rachel Givan	Port Orchard	WA	98367	United States	2025-09-16
127	Kathleen Chittenden	Port Orchard	WA	98366	United States	2025-09-16
128	Serena Randall	Brush Prairie	WA	98606	United States	2025-09-16
129	Katie Stuen	Gig Harbor	WA	98335	United States	2025-09-16
130	Pamela Boremski	Bremerton	WA	98312	United States	2025-09-16
131	Katie Andrews	Seabeck	WA	98380	United States	2025-09-16
132	Jennifer Mock	Bremerton	WA	98312	United States	2025-09-16
133	Kyle Andrews	Seabeck	WA	98380	United States	2025-09-16
134	Halie Moore	Seabeck	WA	98380	United States	2025-09-16
135	Tamara Kulp	Port Orchard	WA	98367	United States	2025-09-16
136	Chace Leeman	Seabeck	WA	98380	United States	2025-09-16
137	Beckett Stock	Roy	WA	98580	United States	2025-09-16
138	Carrie McConnell	Seabeck	WA	98380	United States	2025-09-16
139	Lauren Keehn	Port Orchard	WA	98366	United States	2025-09-16

No.	Name	City	State	Postal Code	Country	Signed On
140	Paula Lawrence	Port Orchard	WA	98367	United States	2025-09-16
141	Alice Jensen	Port Orchard	WA	98367	United States	2025-09-16
142	Laurie Hulscher	Gig Harbor	WA	98332	United States	2025-09-16
143	Joelle Decker	Belgrade	MT	59714	United States	2025-09-16
144	Phil Moncrief	Port Orchard	WA	98367	United States	2025-09-16
145	Veronica Stephens-East	Roy	WA	98580	United States	2025-09-16
146	Anne Sherlock	Seabeck	WA	98380	United States	2025-09-16
147	Carolyn kulp	Port Orchard	WA	98367	United States	2025-09-16
148	Kimberly Martens	Port Orchard	WA	98366	United States	2025-09-16
149	Lana Fuller	Bainbridge Island	WA	98110	United States	2025-09-16
150	Makayla Hafner	Bremerton	WA	98312	United States	2025-09-16
151	Jennifer Nation	Port Orchard	WA	98367	United States	2025-09-16
152	Angela Guertler	Bountiful	UT	84010	United States	2025-09-16
153	Kimberly DeSpain	Port Orchard	WA	98367	United States	2025-09-16
154	Janet O'Connell	Port Orchard	WA	98366	United States	2025-09-16
155	Myah Casaus	Port Orchard	WA	98366	United States	2025-09-16
156	Rachel Schwartz	Hansville	WA	98340	United States	2025-09-16
157	Krystina Broad	Kailua	HI	96734	United States	2025-09-16
158	Aaron Stahowiak	Hansville	WA	98340	United States	2025-09-16
159	Karla Garcia	Port Orchard	WA	98367	United States	2025-09-16
160	Lisa Soete	Olalla	WA	98359	United States	2025-09-16
161	ella hager	Snohomish	WA	98290	United States	2025-09-16
162	David Carnahan	Port Orchard	WA	98367	United States	2025-09-16
163	Eileen France	Bremerton	WA	98311	United States	2025-09-16
164	Carrie Carollo	Silverdale	WA	98383	United States	2025-09-16
165	Mitzi Sturgeon	Bremerton	WA	98312	United States	2025-09-16
166	Kristin Seevers	Poulsbo	WA	98370	United States	2025-09-16
167	Rachael Fisk	Poulsbo	WA	98370	United States	2025-09-16
168	Rebecca Gore-Clark	Poulsbo	WA	98370	United States	2025-09-16
169	Blake Baker	Poulsbo	WA	98370	United States	2025-09-16
170	Heidi Bronsink	Sequim	WA	98382	United States	2025-09-16
171	Angel Jarred	Port orchard	WA	98359	United States	2025-09-16
172	Alix Stewart	Port Orchard	WA	98366	United States	2025-09-16
173	Denise Beck	Port Orchard	WA	98367	United States	2025-09-16

No.	Name	City	State	Postal Code	Country	Signed On
174	Melissa Griffiths	Suquamish	WA	98392	United States	2025-09-16
175	Annie Gambardella	Bremerton	WA	98312	United States	2025-09-16
176	Aime Lynn Cross	Port Orchard	WA	98367	United States	2025-09-16
177	Jen McGeorge	Poulsbo	WA	98370	United States	2025-09-16
178	autumn k	Port Orchard	WA	98366	United States	2025-09-16
179	KARIN MOOTH	Poulsbo	WA	98370	United States	2025-09-16
180	Kristi Christman	Bremerton	WA	98312	United States	2025-09-16
181	Joy Miller	Bremerton	WA	98312	United States	2025-09-16
182	Sandra Stewart	Silverdale	WA	98383	United States	2025-09-16
183	Madison Block	Silverdale	WA	98383	United States	2025-09-16
184	Jennifer Stone	Port orchard	WA	98367	United States	2025-09-16
185	Christine murray	Port orchard	WA	98367	United States	2025-09-16
186	Christina Polston	Port Orchard	WA	98367	United States	2025-09-16
187	Serenity Frank	Bremerton	WA	98312	United States	2025-09-16
188	Lisa Varney	Grapeview	WA	98546	United States	2025-09-16
189	Rhonda Crooks	Bremerton	WA	98312	United States	2025-09-16
190	Janet Spears	Port Orchard	WA	98367	United States	2025-09-16
191	Elizabeth Bailey	Suquamish	WA	98392	United States	2025-09-16
192	Norma Barojas	Port Orchard	WA	98367	United States	2025-09-16
193	Bob Cook	Silverdale	WA	98383	United States	2025-09-16
194	Sandra Charbonneau	Port Orchard	WA	98367	United States	2025-09-16
195	Kate Sisco	Port Orchard	WA	98367	United States	2025-09-16
196	Kaelin Singer	Kingston	WA	98346	United States	2025-09-16
197	Robin Singer	Kingston	WA	98346	United States	2025-09-16
198	Ferrol Davis	Port Orchard	WA	98367	United States	2025-09-16
199	Mandy C	Silverdale	WA	98315	United States	2025-09-16
200	Valerie Valerie Bettger-Tideman	Port Angeles	WA	98362	United States	2025-09-16
201	Rachael Allen	Port Orchard	WA	98366	United States	2025-09-16
202	Victoria Hoisington	Bremerton	WA	98312	United States	2025-09-16
203	Amalia Brown	Bremerton	WA	98310	United States	2025-09-16
204	Isabel Haag	Bremerton	WA	98311	United States	2025-09-16
205	Dawn Shepard	Poulsbo	WA	98370	United States	2025-09-16
206	Kathy Higingbotham	Gig Harbor	WA	98332	United States	2025-09-16
207	Jody Dye	Gig Harbor	WA	98329	United States	2025-09-16

No.	Name	City	State	Postal Code	Country	Signed On
208	Dennis Herling	Bremerton	WA	98312	United States	2025-09-16
209	Renee Holt	Poulsbo	WA	98370	United States	2025-09-16
210	Jacey Shaw	Lakewood	WA	98499	United States	2025-09-16
211	Rebecca Hawkins	Port Orchard	WA	98366	United States	2025-09-16
212	Sarah Mastberg Mastberg	Port Orchard	WA	98367	United States	2025-09-16
213	Matt Griep	Hansville	WA	98340	United States	2025-09-16
214	Mary Enges	Poulsbo	WA	98370	United States	2025-09-16
215	Margaret Baltar	Bainbridge Island	WA	98110	United States	2025-09-16
216	Kayli Barnes	Bremerton	WA	98312	United States	2025-09-16
217	Cheryl Tjulander	Bremerton	WA	98311	United States	2025-09-16
218	Georgia Schaber	Poulsbo	WA	98370	United States	2025-09-16
219	Penny C. Palmer	Port Orchard	WA	98366	United States	2025-09-16
220	Cynthia Johnson	Port Orchard	WA	98366	United States	2025-09-16
221	Rachel Adra	Madisonville	TN	37354	United States	2025-09-16
222	Dee Robinson	Poulsbo	WA	98370	United States	2025-09-16
223	Elena Collins	Seattle	WA	98126	United States	2025-09-16
224	Brian Ortiz	Port Orchard	WA	98367	United States	2025-09-16
225	Adrian Ortiz	Port Orchard	WA	98367	United States	2025-09-16
226	Robin Beck	Gig Harbor	WA	98335	United States	2025-09-16
227	Sara Creekmore	Kingston	WA	98346	United States	2025-09-16
228	Polly Kroll	Port Orchard	WA	98367	United States	2025-09-16
229	DAWN Chipps	Port Orchard	WA	98366	United States	2025-09-16
230	Cody Dato	Port Orchard	WA	98367	United States	2025-09-16
231	Kelsi White	Port Orchard	WA	98366	United States	2025-09-16
232	Paige Cummings	Port Orchard	WA	98336	United States	2025-09-16
233	Jenniver Turla	Kingston	WA	98346	United States	2025-09-16
234	Betty Guy	Mount Airy	MD	21771	United States	2025-09-16
235	Melissa McCullough	Port Orchard	WA	98366	United States	2025-09-16
236	Claudia Yeaman	Gig Harbor	WA	98335	United States	2025-09-16
237	Amanda Gelderman	Poulsbo	WA	98370	United States	2025-09-16
238	Susie Howes	Kingston	WA	98346	United States	2025-09-16
239	Rachel Fenton	Folsom	LA	70437	United States	2025-09-16
240	Jeanette Baird	Port Orchard	WA	98366	United States	2025-09-16
241	Zach Baughman	Port Orchard	WA	98366	United States	2025-09-16

No.	Name	City	State	Postal Code	Country	Signed On
242	Ja Grice	Port Orchard	WA	98366	United States	2025-09-16
243	Mary Ramsey	Bainbridge Island	WA	98110	United States	2025-09-16
244	Jeanne Toulon	Gig Harbor	WA	98335	United States	2025-09-16
245	Helen Smith	Port Orchard	WA	98367	United States	2025-09-16
246	Jennifer Roger	Silverdale	WA	98383	United States	2025-09-16
247	Maria Ines Viana	Port Orchard	WA	98367	United States	2025-09-16
248	John Mortensen	Bremerton	WA	98312	United States	2025-09-16
249	Christine Hosch	Mahtomedi	MN	55115	United States	2025-09-16
250	Shelley Griffis	Keyport	WA	98345	United States	2025-09-16
251	Leslie Mann	Port Charlotte	FL	33981	United States	2025-09-16
252	Tamalyn Merritt	Port Orchard	WA	98367	United States	2025-09-16
253	Rachel Page	Olalla	WA	98359	United States	2025-09-16
254	Tracy Connick	Port Orchard	WA	98367	United States	2025-09-16
255	Sage Gagner	Port Orchard	WA	98366	United States	2025-09-16
256	Cami Hart	Port Orchard	WA	98367	United States	2025-09-16
257	Jessica Corcell	Silverdale	WA	98383	United States	2025-09-16
258	Tatiana Tubberville	Seabeck	WA	98380	United States	2025-09-16
259	Kimberly Shattun	Port Orchard	WA	98367	United States	2025-09-16
260	kim Federspiel	Vaughn	WA	98394	United States	2025-09-16
261	Megan Coleman	Port Orchard	WA	98367	United States	2025-09-16
262	Stefanie Trenchard	Woodside	CA	94062	United States	2025-09-16
263	Rita Hawk	Bremerton	WA	98312	United States	2025-09-16
264	Crystal Henderson	Bremerton	WA	98311	United States	2025-09-16
265	Rhianna Wiser	Seabeck	WA	98380	United States	2025-09-16
266	Dawn Pryde	Poulsbo	WA	98370	United States	2025-09-16
267	Cindee Casaus	Port Orchard	WA	98366	United States	2025-09-16
268	Sierra Grimes	Longbranch	WA	98351	United States	2025-09-16
269	Kristen Counts	Silverdale	WA	98383	United States	2025-09-16
270	Samantha Binford	Port Orchard	WA	98366	United States	2025-09-16
271	Rosanna Diggs	Port Orchard	WA	98366	United States	2025-09-16
272	Abigail Johnson	Poulsbo	WA	98370	United States	2025-09-16
273	Lynn Giannotti	Port Orchard	WA	98367	United States	2025-09-16
274	Tiffany Chambers	Gig Harbor	WA	98329	United States	2025-09-16
275	Crystal Hart	Poulsbo	WA	98370	United States	2025-09-16

No.	Name	City	State	Postal Code	Country	Signed On
276	Alyssa Richards	Port Orchard	WA	98367	United States	2025-09-16
277	Chloe Galbreath	Poulsbo	WA	98370	United States	2025-09-16
278	Theresa Carpinito	San Francisco	CA	94107	United States	2025-09-16
279	Tracy Abbott	BremertonSeattle	WA	98312	United States	2025-09-16
280	Amber Keehn-Cross	Port Orchard	WA	98367	United States	2025-09-16
281	Dawn Comstock	Poulsbo/Brownsville	WA	98370	United States	2025-09-16
282	Lou Fitch	Bremerton	WA	98312	United States	2025-09-16
283	Elizabeth Roth	Poulsbo	WA	98370	United States	2025-09-16
284	Ronald Clark	Whittier	CA	90604	United States	2025-09-16
285	Melissa Byrd	Bremerton	WA	98312	United States	2025-09-16
286	Lauren Smith	Silverdale	SC	29479	United States	2025-09-16
287	Alecia Keppert	Port Orchard	WA	98367	United States	2025-09-16
288	Teresa Case	Seattle	WA	98168	United States	2025-09-16
289	Jason Head	Port Orchard	WA	98367	United States	2025-09-16
290	Aimee Oien	Bremerton	WA	98312	United States	2025-09-16
291	Olivia Tobin	Poulsbo	WA	98370	United States	2025-09-16
292	Sandra Wagner	Port Orchard	WA	98366	United States	2025-09-16
293	Katelynne Plowman	Bremerton	WA	98311	United States	2025-09-16
294	Lea Carstensen	Bremerton	WA	98312	United States	2025-09-16
295	Nerissa Frazier	Port Orchard	WA	98366	United States	2025-09-16
296	Anastasia Bidne	Poulsbo	WA	98370	United States	2025-09-16
297	Amanda Bond	Poulsbo	WA	98370	United States	2025-09-16
298	George C Nold Jr	Poulsbo	WA	98370	United States	2025-09-16
299	Joanna Orr	Lakewood	WA	98499	United States	2025-09-16
300	Nina Halvorson	Erda	UT	84074	United States	2025-09-16
301	Kimberly Almeida	Bremerton	WA	98312	United States	2025-09-16
302	Tina Bale	Poulsbo	WA	98370	United States	2025-09-16
303	Renee Amundsen	Poulsbo	WA	98370	United States	2025-09-16
304	Romeo Ramones	Gig Harbor	WA	98332	United States	2025-09-16
305	Taylor Payne	Graham	WA	98338	United States	2025-09-16
306	Kevin Frank	Seabeck	WA	98380	United States	2025-09-16
307	Justina Novak	Union	WA	98592	United States	2025-09-16
308	Gloria Keifert	Poulsbo	WA	98370	United States	2025-09-16
309	C. Callahan	Glen Burnie	MD	21060	United States	2025-09-16

No.	Name	City	State	Postal Code	Country	Signed On
310	Howard Collins	Southworth	WA	98386	United States	2025-09-16
311	Cathy Bourgeois	Poulsbo	WA	98370	United States	2025-09-16
312	Maechelle Watson	Port Orchard	WA	98366	United States	2025-09-16
313	Kristina Rork	Poulsbo	WA	98370	United States	2025-09-16
314	Cas Taylor	Seabeck	WA	98380	United States	2025-09-16
315	Allie Honeycutt	Bremerton	WA	98312	United States	2025-09-16
316	Lexis Washburn	Klamath Falls	OR	97603	United States	2025-09-16
317	Caleb Hosch	Lexington	KY	40508	United States	2025-09-16
318	Mike Giese	Poulsbo	WA	98370	United States	2025-09-16
319	Laura Irvine	Port Orchard	WA	98367	United States	2025-09-16
320	Nichole Gonzalez	Screven	GA	31560	United States	2025-09-16
321	Hector Fragoso	Port Orchard	WA	98367	United States	2025-09-16
322	Cara Lunsford	Bremerton	WA	98337	United States	2025-09-16
323	Kelly Tabert	Bremerton	WA	98311	United States	2025-09-16
324	Susan Sullivan-proctor	Port Orchard	WA	98367	United States	2025-09-16
325	Melanie Valentine	Poulsbo	WA	98370	United States	2025-09-16
326	Miki Gross	Port Orchard	WA	98366	United States	2025-09-16
327	Treven Matthes	Port Orchard	WA	98367	United States	2025-09-16
328	Susan Bassett	Port Orchard	WA	98367	United States	2025-09-16
329	Lara King	Seabeck	WA	98380	United States	2025-09-16
330	Sheree Bonsell	Bremerton	WA	98311	United States	2025-09-16
331	Linda Ficarra	Seabeck	WA	98380	United States	2025-09-16
332	Kristen Carlson	Bremerton	WA	98312	United States	2025-09-16
333	Esther Winona	Gig Harbor	WA	98335	United States	2025-09-16
334	Helen Smith	Port Orchard	WA	98367	United States	2025-09-16
335	Michelle Alejo	Silverdale	WA	98315	United States	2025-09-16
336	Jayne Ross	Port Orchard	WA	98367	United States	2025-09-16
337	Bryce Lawvor	Poulsbo	WA	98370	United States	2025-09-16
338	Madeleine Gates	Poulsbo	WA	98370	United States	2025-09-16
339	Erin Herdman	Port Orchard	WA	98367	United States	2025-09-16
340	Ann Pa	Lino Lakes	MN	55038	United States	2025-09-16
341	Mary Van Horn	Port Orchard	WA	98367	United States	2025-09-16
342	Mary Ullevig	Gig Harbor	WA	98332	United States	2025-09-16
343	Laura Pauls	Edgewood	WA	98372	United States	2025-09-16

No.	Name	City	State	Postal Code	Country	Signed On
344	Stefanie Olson-Schmoker	Silverdale	WA	98383	United States	2025-09-16
345	Brittany Lowe	Port Orchard	WA	98367	United States	2025-09-16
346	Kaycee Rotter	Graham	WA	98338	United States	2025-09-16
347	Tamyra Hutzler	Port orchard	WA	98359	United States	2025-09-16
348	Shonna Gatliff	Bremerton	WA	98312	United States	2025-09-16
349	Shannon Daily	Port Orchard	WA	98367	United States	2025-09-16
350	Matthew Gates	Bremerton	WA	98312	United States	2025-09-16
351	Gail Carlson	Seattle	WA	98105	United States	2025-09-16
352	Shelby Bayard	Seabeck	WA	98380	United States	2025-09-16
353	Mary Clevenger	Poulsbo	WA	98370	United States	2025-09-16
354	Nathan Wagner	Port Orchard	WA	98366	United States	2025-09-16
355	Jessica Harty	Bremerton	WA	98312	United States	2025-09-16
356	Liana Williams	Olalla	WA	98359	United States	2025-09-16
357	Sara Schroeter	Fox Island	WA	98333	United States	2025-09-16
358	David Faust	Olalla	WA	98359	United States	2025-09-16
359	Heidi Danilchik	Poulsbo	WA	98370	United States	2025-09-16
360	Khara Stefnik	Seabeck	WA	98380	United States	2025-09-16
361	John Olson	Silverdale	WA	98383	United States	2025-09-16
362	Shannon Boldt	Kingston	WA	98346	United States	2025-09-16
363	Ellen Johnson	Bremerton	WA	98337	United States	2025-09-16
364	MaryEmma Symington	Bremerton	WA	98311	United States	2025-09-16
365	Megan Baldwin	Bremerton	WA	98312	United States	2025-09-16
366	James C Dawson	Port Orchard	WA	98367	United States	2025-09-16
367	Liz Santillan	Lahaina	HI	96761	United States	2025-09-16
368	Tracy Phillips	Olalla	WA	98359	United States	2025-09-16
369	Erin Jones	Kingston	WA	98346	United States	2025-09-16
370	Leanna Vandlen	Tacoma	WA	98409	United States	2025-09-16
371	Jada Guy	Silverdale	WA	98383	United States	2025-09-16
372	Cindi Christman	Port Orchard	WA	98367	United States	2025-09-16
373	Karlie Gaskins	Port Orchard	WA	98366	United States	2025-09-16
374	Kierra Shelton	Port Orchard	WA	98366	United States	2025-09-16
375	Jennifer Ross				United States	2025-09-16
376	Sharalyn Shafer	Port Orchard	WA	98366	United States	2025-09-16
377	Tonya Pearce	Gig Harbor	WA	98329	United States	2025-09-16

No.	Name	City	State	Postal Code	Country	Signed On
378	Jodi Wright	Tacoma	WA	98418	United States	2025-09-16
379	JC MAze	Culver City	CA	90230	United States	2025-09-16
380	Ashley Stamm	Kingston	WA	98346	United States	2025-09-16
381	Dianna Endicott	Mansfield	OH	44904	United States	2025-09-16
382	Joshua Ross	Port Orchard	WA	98366	United States	2025-09-16
383	Jennifer Bodi	Villefontaine		38090	France	2025-09-16
384	Robert Calhoun	Seattle	WA	98122	United States	2025-09-16
385	Olivia Carley	Port Orchard	WA	98366	United States	2025-09-16
386	Angelita Martinez	Port Orchard	WA	98366	United States	2025-09-16
387	Ashley Govia	Port Orchard	WA	98367	United States	2025-09-16
388	Anne Montgomery	Port Orchard	WA	98367	United States	2025-09-16
389	Taylor Frank	Port Hadlock-Irondale	WA	98339	United States	2025-09-16
390	julia winkler	Poulsbo	WA	98370	United States	2025-09-16
391	Carol Crosby	Port Townsend	WA	98368-5905	United States	2025-09-16
392	Charity Adkins	Kenova	WV	25530	United States	2025-09-16
393	Julianna Allison	Puyallup	WA	98371	United States	2025-09-16
394	Kellie Greenhill	Port Orchard	WA	98367	United States	2025-09-16
395	joyce ruzanka	gig harbor	WA	98332	United States	2025-09-16
396	Kimberley Gentkowski	Bremerton	WA	98312	United States	2025-09-16
397	Tej Tiedeman	Kingston	WA	98346	United States	2025-09-16
398	Jessica Tucker	Poulsbo	WA	98370	United States	2025-09-16
399	Courtney Childress	Bainbridge Island	WA	98110	United States	2025-09-16
400	Lawran Reed	Bremerton	WA	98312	United States	2025-09-16
401	Nancy Schroeder	Port Orchard	WA	98366	United States	2025-09-16
402	Andrea Makowski	Belfair	WA	98528	United States	2025-09-16
403	Susan Hansch	Seattle	WA	98168	United States	2025-09-16
404	Kerry mcconkey	Bremerton	WA	98311	United States	2025-09-16
405	Faust Danielle	Olalla	WA	98359	United States	2025-09-16
406	Whitney Koontz	Hansville	WA	98340	United States	2025-09-16
407	Kristen McNab	Kingston	WA	98346	United States	2025-09-16
408	Harmony Alder	Seattle	WA	98160	United States	2025-09-16
409	Spencer Gaskins	Port Orchard	WA	98366	United States	2025-09-16
410	Sandra Lang	Port Orchard	WA	98366	United States	2025-09-16
411	Angela Alexander	Seabeck	WA	98380	United States	2025-09-16

No.	Name	City	State	Postal Code	Country	Signed On
412	Kendra Pardy	Bainbridge Island	WA	98110	United States	2025-09-16
413	Vanessa Kurpgeweit	Kingston	WA	98346	United States	2025-09-16
414	Christine Headley	Gig Harbor	WA	98335	United States	2025-09-16
415	Leann Strunk	Belfair	WA	98528	United States	2025-09-16
416	Rocky Scott	Monterey	CA	93940	United States	2025-09-16
417	Kara Babcock	Port Orchard	WA	98366	United States	2025-09-16
418	Brianna Hallman	Bremerton	WA	98312	United States	2025-09-16
419	Kim Wymer	Bainbridge Island	WA	98110	United States	2025-09-16
420	Emily Garcia	Kingston	WA	98346	United States	2025-09-16
421	Maureen Buckley	Poulsbo	WA	98370	United States	2025-09-16
422	Cassy Barbarino	Port Orchard	WA	98366	United States	2025-09-16
423	Melanie Monroe	Everett	WA	98203	United States	2025-09-16
424	Melissa Campbell	Loves Park	IL	61111	United States	2025-09-16
425	Laurin Webb	Hatton	WA	99	United States	2025-09-16
426	KIMBERLY BOAG	Poulsbo	WA	98370	United States	2025-09-16
427	Karen Johnson	Kingston	WA	98346	United States	2025-09-16
428	Kay Cowan	Port Orchard	WA	98367	United States	2025-09-16
429	Jonas Mueller	Kingston	WA	98346	United States	2025-09-16
430	Shelley Pauls	Auburn	WA	98001	United States	2025-09-16
431	stephene nelsen	Bainbridge Island	WA	98110	United States	2025-09-16
432	Angela Tooley	Port Orchard	WA	98366	United States	2025-09-16
433	Alexandra Mackin	Bainbridge Island	WA	98110	United States	2025-09-16
434	Katherine Fuerst	Suquamish	WA	98392	United States	2025-09-16
435	Isabel Riley	Port Orchard	WA	98367	United States	2025-09-16
436	Annika McCord Frey	Belfair	WA	98528	United States	2025-09-16
437	Jeanne Feinstein	Poulsbo	WA	98370	United States	2025-09-16
438	Anna Agius	Bremerton	WA	98312	United States	2025-09-16
439	Dawna Huffmaster	Hansville	WA	98340	United States	2025-09-17
440	Sierra Huffmaster	Hansville	WA	98340	United States	2025-09-17
441	Karen Steele	Poulsbo	WA	98370	United States	2025-09-17
442	Randy Deitch	Poulsbo	WA	98370	United States	2025-09-17
443	Kaitlyn Huffmaster	Hansville	WA	98340	United States	2025-09-17
444	Kacey Gray	Poulsbo	WA	98370	United States	2025-09-17
445	Sherman Leddon	Poulsbo	WA	98370	United States	2025-09-17

No.	Name	City	State	Postal Code	Country	Signed On
446	Felecia Hardy	Bremerton	WA	98310	United States	2025-09-17
447	Karly Camasto	Bremerton	WA	98310	United States	2025-09-17
448	Zoraya Ballentine	Gig Harbor	WA	98332	United States	2025-09-17
449	Janelle Tipton	Elmwood	TN	38560	United States	2025-09-17
450	Marshall Pinto	Port Orchard	WA	98367	United States	2025-09-17
451	Jo Lembo	Mesa	AZ	85210	United States	2025-09-17
452	Pamela Bilodeau	Silverdale	WA	98383	United States	2025-09-17
453	Lyndi Thompson	Auburn	WA	98092	United States	2025-09-17
454	Debra Moncrief	Port Orchard	WA	98367	United States	2025-09-17
455	Sarah Collins	Silverdale	WA	98383	United States	2025-09-17
456	Alina Keele	South Hill	WA	98373	United States	2025-09-17
457	Hilary Stines	Seabeck	WA	98380	United States	2025-09-17
458	Leigh Anne Hardy	Poulsbo	WA	98370	United States	2025-09-17
459	Maciana PenaVielza	Seabeck	WA	98380	United States	2025-09-17
460	Jennifer Mathews	Poulsbo	WA	98370	United States	2025-09-17
461	Glenna Wickett	Graham	WA	98338	United States	2025-09-17
462	Jasmine Sullivan	Seabeck	WA	98380	United States	2025-09-17
463	Kimberly Rios	Colville	WA	99114	United States	2025-09-17
464	Alyson Coleman	Port Orchard	WA	98366	United States	2025-09-17
465	Grace Newton	Port Orchard	WA	98367	United States	2025-09-17
466	Tori Clark	Moscow	ID	83843	United States	2025-09-17
467	Lou Wiens	Inman	KS	67546	United States	2025-09-17
468	Erica Whitbeck	Hansville	WA	98340	United States	2025-09-17
469	Debbie Sullivan	Seabeck	WA	98380	United States	2025-09-17
470	Mary Van Dyk	Arlington	WA	98223	United States	2025-09-17
471	CATHY OHARA	Port Orchard	WA	98366	United States	2025-09-17
472	Cynthia Chase	Poulsbo	WA	98370	United States	2025-09-17
473	David Turley	Port Orchard	WA	98366	United States	2025-09-17
474	Laura Carlson	Gig Harbor	WA	98335	United States	2025-09-17
475	Michael Roth	Kuna	ID	83634	United States	2025-09-17
476	Isabella Hernandez	Silverdale	WA	98383	United States	2025-09-17
477	Linda Heath	Bremerton	WA	98312	United States	2025-09-17
478	Julie Sheridan	Bremerton	WA	98312	United States	2025-09-17
479	Courtney Barnato	Port Orchard	WA	98366	United States	2025-09-17

No.	Name	City	State	Postal Code	Country	Signed On
480	Jeanine Hurst	Silverdale	WA	98383	United States	2025-09-17
481	Charles Hart	Port Orchard	WA	98367	United States	2025-09-17
482	Miles Millican	Poulsbo	WA	98370	United States	2025-09-17
483	Ben Anson	Bainbridge Island	WA	98110	United States	2025-09-17
484	David Koester	Kingston	WA	98346	United States	2025-09-17
485	Cindy Byers	Buckley	WA	98321	United States	2025-09-17
486	samuel henden	poulsbo	WA	98370	United States	2025-09-17
487	Teresa Grabenhofer	Silverdale	WA	98383	United States	2025-09-17
488	Kate Hill	Bonney Lake	WA	98391	United States	2025-09-17
489	Cassandea Hall	Milton	WA	98354	United States	2025-09-17
490	Glenn Pauls	Johnson City	KS	67855	United States	2025-09-17
491	Scott Walker	Seattle	WA	98144	United States	2025-09-17
492	Kirsten Peterson	Portland	OR	97203	United States	2025-09-17
493	Tanner Wooding	Snohomish	WA	98296	United States	2025-09-17
494	Nancy Howson	Port Orchard	WA	98367	United States	2025-09-17
495	Ledford, Selinda	Port Orchard	WA	98366	United States	2025-09-17
496	Seasha Hassett	Bremerton	WA	98312	United States	2025-09-17
497	Erin Woodell	Olalla	WA	98359	United States	2025-09-17
498	Suzie Knight	Port Orchard	WA	98366	United States	2025-09-17
499	Sharon Gakin	Port Orchard	WA	98366	United States	2025-09-17
500	Bonnie Carpenter	Puyallup	WA	98374	United States	2025-09-17
501	Janice Michaelson	Edgewood	WA	98372	United States	2025-09-17
502	Jennifer Heineman	Yelm	WA	98597	United States	2025-09-17
503	Rosemary Schuessler	Bremerton	WA	98312	United States	2025-09-17
504	Nichole Dawson	Poulsbo	WA	98370	United States	2025-09-17
505	Shane Miley	Maple Valley	WA	98038	United States	2025-09-17
506	Kim Olsen	Port Orchard	WA	98367	United States	2025-09-17
507	Shelbee Patten	Silverdale	WA	98383	United States	2025-09-17
508	J Garrett	Bremerton	WA	98312	United States	2025-09-17
509	Vera Hazard	Silverdale	WA	98383	United States	2025-09-17
510	Ronda Callaham	Suquamish	WA	98392	United States	2025-09-17
511	Michael Ulrigg	Port Orchard	WA	98367	United States	2025-09-17
512	Ruth Murray	Silverdale	WA	98383	United States	2025-09-17
513	Kendall Tarpley	Kingston	WA	98346	United States	2025-09-17

No.	Name	City	State	Postal Code	Country	Signed On
514	Brandon Selvar	Covington	WA	98042	United States	2025-09-17
515	Shay6 Bonnett Leer	Silverdale	WA	98383	United States	2025-09-17
516	Carol Margulies	Port Orchard	WA	98367	United States	2025-09-17
517	Warren Carley	Port Orchard	WA	98366	United States	2025-09-17
518	Neenah Gillespie	Port Orchard	WA	98367	United States	2025-09-17
519	Myrn Stewart	Port Orchard	WA	98366	United States	2025-09-17
520	Kathleen Lee	Poulsbo	WA	98370	United States	2025-09-17
521	Lila Holliday	Port Orchard	WA	98366	United States	2025-09-17
522	Andrea Kosalko	Kingston	WA	98346	United States	2025-09-17
523	Stephanie Bailey	Port Orchard	WA	98367	United States	2025-09-17
524	Dinah mortell	Bainbridge Island	WA	98110	United States	2025-09-17
525	Carissa Walker	Bremerton	WA	98311	United States	2025-09-17
526	Angel Nolte	Belfair	WA	98528	United States	2025-09-17
527	Susan Newman	Kingston	WA	98346	United States	2025-09-17
528	Maggie McClelland	Seabeck	WA	98380	United States	2025-09-17
529	Nina Brandt-Erichsen	Kingston	WA	98346	United States	2025-09-17
530	Maria Portillo	Poulsbo	WA	98370	United States	2025-09-17
531	Anne Braddock	Pousbo	WA	98370	United States	2025-09-17
532	William Patten	Silverdale	WA	98383	United States	2025-09-17
533	Mary Steelman	Bremerton	WA	98312	United States	2025-09-17
534	Andy Mathews	Poulsbo	WA	98370	United States	2025-09-17
535	pam Halvorsen	Bainbridge Island	WA	98110	United States	2025-09-17
536	Carrie Silvernale	Port Orchard	WA	98367	United States	2025-09-17
537	Suzanne Leon	Federal Way	WA	98023	United States	2025-09-17
538	Alana Markward	Tacoma	WA	98406	United States	2025-09-17
539	AnnaLee Todd	Port Orchard	WA	98366	United States	2025-09-17
540	Tracee Swanson	Olympia	WA	98501	United States	2025-09-17
541	Jessica Behrmann	Gig Harbor	WA	98329	United States	2025-09-17
542	Sondra Church	Lynden	WA	98264	United States	2025-09-17
543	Natasha Watson	Port Orchard	WA	98367	United States	2025-09-17
544	Lidie Durbin	Bremerton	WA	98311	United States	2025-09-17
545	Michelle Pendroy	Bremerton	WA	98312	United States	2025-09-17
546	Dan Hodge	Port Orchard	WA	98366	United States	2025-09-17
547	David Bainter	Aberdeen	WA	98520	United States	2025-09-17

No.	Name	City	State	Postal Code	Country	Signed On
548	Stephanie Tedford	Chicago	IL	60622	United States	2025-09-17
549	Dewel Ayala	MountlakeTerrace	WA	98043	United States	2025-09-17
550	Mardene Fowler	Bremerton	WA	98311	United States	2025-09-17
551	Jeffrey Phillips	Bremerton	WA	98312	United States	2025-09-17
552	Nick Balera	Port Orchard	WA	98367	United States	2025-09-17
553	Katie Justice	Puyallup	WA	98372	United States	2025-09-17
554	Abigail Scott		WA	98524	United States	2025-09-17
555	Brandon Greenhill	Port Orchard	WA	98367	United States	2025-09-17
556	Francis Vella	Seattle	WA	98160	United States	2025-09-17
557	Mackenzie Haynes	Monroe	WA	98272	United States	2025-09-17
558	Susan Mosby	Bremerton	WA	98311	United States	2025-09-17
559	Addison Staley	Port Hadlock-Irondale	WA	98339	United States	2025-09-17
560	Sarah Mealy	Olympia	WA	98512	United States	2025-09-17
561	Beth Gilbraith	Lynnwood	WA	98036	United States	2025-09-17
562	Matthew Green	Port Orchard	WA	98367	United States	2025-09-17
563	Breahna Wilhite	Seabeck	WA	98380	United States	2025-09-17
564	Torrey Podmajersky	Kingston	WA	98346	United States	2025-09-17
565	Casandra Starn	Port Orchard	WA	98366	United States	2025-09-17
566	Deborah Mihali	Fox Island	WA	98333	United States	2025-09-17
567	Jolene Fleming	Auburn	WA	98092	United States	2025-09-17
568	Lynn Thomas	Port Orchard	WA	98366	United States	2025-09-17
569	Alida Mullenix	Silverdale	WA	98383	United States	2025-09-17
570	Lainie Wright	Enumclaw	WA	98022	United States	2025-09-17
571	Andrew Martz	Port Orchard	WA	98367	United States	2025-09-17
572	Haley Winchester	Port Orchard	WA	98367	United States	2025-09-17
573	Aurora Baldwin	Poulsbo	WA	98370	United States	2025-09-17
574	Jennifer Boulet	Graham	WA	98338	United States	2025-09-17
575	Jon Mathews	Entiat	WA	98822	United States	2025-09-17
576	Julian Pangburn	Burlington	WI	53105	United States	2025-09-17
577	Ashley Kennedy	Kingston	WA	98346	United States	2025-09-17
578	Bryce Walgren	Kingston	WA	98346	United States	2025-09-17
579	Rachel McCready	Olalla	WA	98359	United States	2025-09-17
580	Trisha Ringdahl	Silverdale	WA	98383	United States	2025-09-17
581	Jennifer Malocha	Seabeck	WA	98380	United States	2025-09-17

No.	Name	City	State	Postal Code	Country	Signed On
582	Damon Mori	Poulsbo	WA	98370	United States	2025-09-17
583	Tara Harris	Fox Island	WA	98333	United States	2025-09-17
584	Dana Babb	Tacoma	WA	98446	United States	2025-09-17
585	Jeremy Seevers	Poulsbo	WA	98370	United States	2025-09-17
586	Judy Naglich	Port Orchard	WA	98366	United States	2025-09-17
587	Crystal Allers	Poulsbo	WA	98370	United States	2025-09-17
588	Joyce Zegstroo	Poulsbo	WA	98370	United States	2025-09-17
589	Katie Dearinger	Port Orchard	WA	98367	United States	2025-09-17
590	Yvette Stewart	Bremerton	WA	98310	United States	2025-09-17
591	Alyssa Ironside	Bremerton	WA	98312	United States	2025-09-17
592	Gina Michaud	Poulsbo	WA	98370	United States	2025-09-17
593	Lauren Malone	Bremerton	WA	98312	United States	2025-09-17
594	TIFFANY LIN	Bremerton	WA	98311	United States	2025-09-17
595	Laura Miller	Buckley	WA	98321	United States	2025-09-17
596	Carol Green	Silverdale	WA	98383	United States	2025-09-17
597	Rachelle Barron Knight	Bremerton	WA	98310	United States	2025-09-17
598	Blanca Victorino	Port Orchard	WA	98367	United States	2025-09-17
599	Sarah Fowler	Port Orchard	WA	98367	United States	2025-09-17
600	Michelle Stephenson	Poulsbo	WA	98370	United States	2025-09-17
601	Darby Evans	Port Orchard	WA	98366	United States	2025-09-17
602	Cathy Shawley	Gig Harbor	WA	98335	United States	2025-09-17
603	ashley greer	bella vista	AR	72714	United States	2025-09-17
604	Meghan Maves-Swetman	Everett	WA	98201	United States	2025-09-17
605	Deborah Gonzalez	Bremerton	WA	98312	United States	2025-09-17
606	Zachary Bennett	Port Orchard	WA	98367	United States	2025-09-17
607	jazmine jeweline	BREMERTON	WA	98310	United States	2025-09-17
608	Paula Mccune	Seattle	WA	98168	United States	2025-09-17
609	Marie Lagrandeur	Poulsbo	WA	98370	United States	2025-09-17
610	Tammie Ostrander	Seabeck	WA	98380	United States	2025-09-17
611	Anthony Laboranti	Poulsbo	WA	98370	United States	2025-09-17
612	Monica Buchholz	Quilcene	WA	98376	United States	2025-09-17
613	Kendra Burnett	Kingston	WA	98346	United States	2025-09-17
614	Kristalann Foley	Bremerton	WA	98312	United States	2025-09-17
615	Denise Jackson	Port Orchard	WA	98367	United States	2025-09-17

No.	Name	City	State	Postal Code	Country	Signed On
616	Bonita Anderson	Bremerton	WA	98312	United States	2025-09-17
617	Kristina Davis	Port Orchard	WA	98367	United States	2025-09-17
618	Laura Deckman	Bremerton	WA	98310	United States	2025-09-17
619	Sarah Klump	Bremerton	WA	98311	United States	2025-09-17
620	Riely Pratt	Bremerton	WA	98110	United States	2025-09-17
621	Amy Smith	Port Orchard	WA	98367	United States	2025-09-17
622	Kristen Henry	Port Orchard	WA	98367	United States	2025-09-17
623	Zoey Radford	Port Orchard	WA	98366	United States	2025-09-17
624	Lhea Mundell	Kingston	WA	98346	United States	2025-09-17
625	Susan Drinnon	Bremerton	WA	98311	United States	2025-09-17
626	Angie Doan	Port Townsend	WA	98368	United States	2025-09-17
627	Robert McGee	Port Orchard	WA	98366	United States	2025-09-17
628	Kristin Nearing	Lacey	WA	98503	United States	2025-09-17
629	Kimberly Dodd	Port Orchard	WA	98367	United States	2025-09-17
630	Brooke Rickman	Seabeck	WA	98380	United States	2025-09-17
631	Mary Watson	Post Falls	ID	83854	United States	2025-09-17
632	Janis Millett	Santa Barbara	CA	93108	United States	2025-09-17
633	Meghan Sommer	Kingston	WA	98346	United States	2025-09-17
634	Brittney Gerhardt	Gig Harbor	WA	98332	United States	2025-09-17
635	Mallory Lobisser	Bainbridge Island	WA	98110	United States	2025-09-17
636	Ewann Berntson	Port Orchard	WA	98366	United States	2025-09-17
637	Philip Baker	Poulsbo	WA	98370	United States	2025-09-17
638	Sierra Silvernale	Port Orchard	WA	98367	United States	2025-09-17
639	John Swanson	Silverdale	WA	98383	United States	2025-09-17
640	Derek Mayberry	Puyallup	WA	98373	United States	2025-09-17
641	Kathleen Carter	Indianola	WA	98342	United States	2025-09-17
642	Kimberly Roberts	Kingston	WA	98346	United States	2025-09-17
643	Joanna Bennett	Bremerton	WA	98312	United States	2025-09-17
644	Cathey Johnson	Port Orchard	WA	98366	United States	2025-09-17
645	Patricia Thomas	Port Orchard	WA	98367	United States	2025-09-17
646	Cameron Hamblin	Graham	WA	98338	United States	2025-09-17
647	Lori Irwin	Port Orchard	WA	98367	United States	2025-09-17
648	Paul Madden	Gig Harbor	WA	98329	United States	2025-09-17
649	Tiarra sorensen	Bremerton	WA	98312	United States	2025-09-17

No.	Name	City	State	Postal Code	Country	Signed On
650	Matthew Howard	Seabeck	WA	98380	United States	2025-09-17
651	Michelle Abel	Bremerton	WA	98311	United States	2025-09-17
652	Jana Bonny	Silverdale	WA	98383	United States	2025-09-17
653	Susanne Payne	Gig Harbor	WA	98335	United States	2025-09-17
654	Paul Youngman	Port Orchard	WA	98367	United States	2025-09-17
655	Cher Templeton	Bremerton	WA	98312	United States	2025-09-17
656	Melissa Oberlander	Olalla	WA	98359	United States	2025-09-17
657	Dakin YATES	Bremerton	WA	98312	United States	2025-09-17
658	Stephanie Finney	Port Orchard	WA	98367	United States	2025-09-17
659	Jennifer Bradley	Port Orchard	WA	98366	United States	2025-09-17
660	Ava Allers	Port Orchard	WA	98367	United States	2025-09-17
661	Ron Carson	Hansville	WA	98340	United States	2025-09-17
662	Will Winona	Gig Harbor	WA	98335	United States	2025-09-17
663	Jessie Ferrington	Gig Harbor	WA	98329	United States	2025-09-17
664	Laura Kinsey	Bremerton	WA	98311	United States	2025-09-17
665	Alex Manavie	Seabeck	WA	98380	United States	2025-09-17
666	Brenda Bollen	Arlington	WA	98223	United States	2025-09-17
667	Judi Holley	Port Orchard	WA	98366	United States	2025-09-17
668	Rachel Morton	Essex Junction	VT	05452	United States	2025-09-17
669	Victoria Brown	Bainbridge Island	WA	98110	United States	2025-09-17
670	Tana Siebert	Bainbridge Island	WA	98110	United States	2025-09-17
671	Rita Lanier	Lakebay	WA	98349	United States	2025-09-17
672	Kim Sutton	Port Orchard	WA	98367	United States	2025-09-17
673	Jodi Freeman	Port Orchard	WA	98367	United States	2025-09-17
674	Jenn Gravel	Oak Harbor	WA	98277	United States	2025-09-17
675	Karli Jo Hoffheins	Olympia	WA	98512	United States	2025-09-17
676	Lisa Maxey	Castle Rock	WA	98611	United States	2025-09-17
677	kinsley carns	Puyallup	WA	98374	United States	2025-09-17
678	John Onustack	Bremerton	WA	98310	United States	2025-09-17
679	Tammy West	Poulsbo	WA	98370	United States	2025-09-17
680	Julie Halme	Irwin	ID	83428	United States	2025-09-17
681	Melissa Kugler	Bremerton	WA	98311	United States	2025-09-17
682	Annaliese Kurpgeweit	Kingston	WA	98346	United States	2025-09-17
683	Isabelle Kurpgeweit	Kingston	WA	98346	United States	2025-09-17

No.	Name	City	State	Postal Code	Country	Signed On
684	Isabella Postier	Tumwater	WA	98512	United States	2025-09-17
685	Candace Peterson	Poulsbo	WA	98370	United States	2025-09-17
686	Connor Davis	Port Orchard	WA	98367	United States	2025-09-17
687	Christine Turnley	Bremerton	WA	98310	United States	2025-09-18
688	Deborah Klabo	Seattle	WA	98155	United States	2025-09-18
689	Michele Robinson	Port Orchard	WA	98367	United States	2025-09-18
690	Kristi Taylor	Seabeck	WA	98380	United States	2025-09-18
691	Melissa Johnson	Gig Harbor	WA	98332	United States	2025-09-18
692	Sue Gildner	Olympia	WA	98512	United States	2025-09-18
693	Linda Day	Poulsbo	WA	98370	United States	2025-09-18
694	Kylee Ledford	Port Orchard	WA	98367	United States	2025-09-18
695	Hayden Steele	Seabeck	WA	98380	United States	2025-09-18
696	Ashlee Imhoff	Port Orchard	WA	98366	United States	2025-09-18
697	Citlaly Mares	Poulsbo	WA	98370	United States	2025-09-18
698	Payton Pierce	Bremerton	WA	98312	United States	2025-09-18
699	Alicia Savage	Gig Harbor	WA	98332	United States	2025-09-18
700	Teri DAVIS	Bremerton	WA	98312	United States	2025-09-18
701	Donata Loveless	Bremerton	WA	98312	United States	2025-09-18
702	Corey Knapp	Bremerton	WA	98312	United States	2025-09-18
703	REBECCA EVENHUS	PORT ORCHARD	WA	98366	United States	2025-09-18
704	Elizabeth Deckman	Bremerton	WA	98310	United States	2025-09-18
705	Jessica Myette	Port Orchard	WA	98366	United States	2025-09-18
706	Mark Storms	Edgewood	WA	98372	United States	2025-09-18
707	Brian Ouellette	Port Orchard	WA	98366	United States	2025-09-18
708	Melissa Byerly	Belfair	WA	98528	United States	2025-09-18
709	Lindsay Chilton	Port Orchard	WA	98367	United States	2025-09-18
710	Paige Campbell	Auburn	WA	98092	United States	2025-09-18
711	Laurie Irvin	Bremerton	WA	98310	United States	2025-09-18
712	Christine and John Hoyt	Seattle	WA	98103	United States	2025-09-18
713	Scott Campbell	Everett	WA	98213	United States	2025-09-18
714	Monday Galbreath	Bremerton	WA	98312	United States	2025-09-18
715	Blake Brown	Port Orchard	WA	98367	United States	2025-09-18
716	Robby Garrett	Bremerton	WA	98310	United States	2025-09-18
717	Dana Clacton	Auburn	WA	98002	United States	2025-09-18

No.	Name	City	State	Postal Code	Country	Signed On
718	Ian Rork	Poulsbo	WA	98370	United States	2025-09-18
719	Joseph Ward	Seabeck	WA	98380	United States	2025-09-18
720	Jeff Hurley	Olalla	WA	98359	United States	2025-09-18
721	Sally Lofthus	Wallace	CA	95254	United States	2025-09-18
722	Rob Felt	Gig Harbor	WA	98335	United States	2025-09-18
723	June Coppinger	Port Orchard	WA	98367	United States	2025-09-18
724	Richard Williams	Port Orchard	WA	98367	United States	2025-09-18
725	Catherine Latour	Bremerton	WA	98312	United States	2025-09-18
726	Leah Mellinger	Kingston	WA	98346	United States	2025-09-18
727	Abby Garcia	Sequim	WA	98382	United States	2025-09-18
728	Cynthia Mills	Bremerton	WA	98312	United States	2025-09-18
729	James Teel	Poulsbo	WA	98370	United States	2025-09-18
730	Amanda Edwards	Port Orchard	WA	98366	United States	2025-09-18
731	Raiyen Stamm	Kingston	WA	98346	United States	2025-09-18
732	Elyse Danielle	Auburn	WA	98092	United States	2025-09-18
733	Steve Harris	Port Orchard	WA	98367-8539	United States	2025-09-18
734	Alida Schreier	Poulsbo	WA	98370	United States	2025-09-18
735	Teri Amundson	Poulsbo	WA	98370	United States	2025-09-18
736	Diane Smith	Seabeck	WA	98380	United States	2025-09-18
737	Amy Morse	Port Ludlow	WA	98365	United States	2025-09-18
738	Rachel Fair	Seabeck	WA	98380	United States	2025-09-18
739	Jennica Moomaw	Gig Harbor	WA	98335	United States	2025-09-18
740	Tiffany Cobb	Port Orchard	WA	98367	United States	2025-09-18
741	Melanie Hedrick	Bremerton	WA	98312	United States	2025-09-18
742	Talisha Affonce	Bremerton	WA	98312	United States	2025-09-18
743	Jennifer Nelson	Bremerton	WA	98311	United States	2025-09-18
744	Richard Polston	Port Orchard	WA	98367	United States	2025-09-18
745	Katie Hedrick	Bremerton	WA	98312	United States	2025-09-18
746	Valerie Middleton	Kingston	WA	98346	United States	2025-09-18
747	Denise Burbidge	Manchester	WA	98353	United States	2025-09-18
748	Justine Carson	Port Orchard	WA	98367	United States	2025-09-18
749	Muree Dunmire	Port Orchard	WA	98367	United States	2025-09-18
750	Jessica Smith	Bremerton	WA	98337	United States	2025-09-18
751	Colleen Clement	Seabeck	WA	98380	United States	2025-09-18

No.	Name	City	State	Postal Code	Country	Signed On
752	Jeff Johnson	Port Orchard	WA	98366	United States	2025-09-18
753	Christopher Dieringer	Bremerton	WA	98311	United States	2025-09-18
754	Brittany Tiemeyer	Poulsbo	WA	98370	United States	2025-09-18
755	Marissa Conmay	Bremerton	WA	98312	United States	2025-09-18
756	Cori Smith	Bainbridge Island	WA	98110	United States	2025-09-18
757	Marietta Szubski	Kingston	WA	98346	United States	2025-09-18
758	Jim ginty Ginty	Bremerton	WA	98311	United States	2025-09-18
759	Ashley Schnabel	Gig Harbor	WA	98329	United States	2025-09-18
760	Natasha Sustachek	Kingston	WA	98346	United States	2025-09-18
761	Caleb Jenkins	Gig Harbor	WA	98329	United States	2025-09-18
762	Linda Michael	Portland	OR	97252	United States	2025-09-18
763	Landon Biewald	Port Orchard	WA	98367	United States	2025-09-18
764	Pamela Knudsen	Bremerton	WA	98312	United States	2025-09-18
765	Stephanie Hanlon	Bremerton	WA	98312	United States	2025-09-18
766	Corey Tucker	Bremerton	WA	98312	United States	2025-09-18
767	Michael Craig	Seabeck	WA	98380	United States	2025-09-18
768	T Tracer	Port Townsend	WA	98368	United States	2025-09-18
769	Heidi Thompson	Poulsbo	WA	98370	United States	2025-09-18
770	Michelle Hart	Seattle	WA	98109	United States	2025-09-18
771	Jodi Rose	Silverdale	WA	98383	United States	2025-09-18
772	James Van Cleef	Port Orchard	WA	98366	United States	2025-09-18
773	Jennifer Frey	Poulsbo	WA	98370	United States	2025-09-18
774	Wendy Walker	Port Orchard	WA	98366	United States	2025-09-18
775	Pamela Benson	Poulsbo	WA	98370	United States	2025-09-18
776	Lorie Thomas	Selah	WA	98942	United States	2025-09-18
777	Karen Lindsey	Bainbridge Island	WA	98110	United States	2025-09-18
778	Denise Zaske	Poulsbo	WA	98370	United States	2025-09-18
779	Laurie Shen	Manchester	NH	03109	United States	2025-09-18
780	Roberta Baldwin	Kingston	WA	98346	United States	2025-09-18
781	Amanda Gourley	Poulsbo	WA	98370	United States	2025-09-18
782	Tracy Thompson	Port Orchard	WA	98367	United States	2025-09-18
783	Theresa Herstad	Port Orchard	WA	98367	United States	2025-09-18
784	Makayla Lawman	Port Orchard	WA	98367	United States	2025-09-18
785	Merlie Joy	Port Orchard	WA	98367	United States	2025-09-18

No.	Name	City	State	Postal Code	Country	Signed On
786	Lindsey Templeton	Bremerton	WA	98312	United States	2025-09-18
787	Steven DeCoy	Port Orchard	WA	98367	United States	2025-09-18
788	Victoria Baty	Bremerton	WA	98312	United States	2025-09-18
789	Kristine Strand	Poulsbo	WA	98370	United States	2025-09-18
790	Meleny Rosendahl	Gig Harbor	WA	98329	United States	2025-09-18
791	Nikki Snyder	Lincoln	MT	59639	United States	2025-09-18
792	Piper Falk-Wain	Silverdale	WA	98383	United States	2025-09-18
793	Karlee Kelmel	Port Orchard	WA	98367	United States	2025-09-18
794	Trowbridge, Torrin	Gig Harbor	WA	98335	United States	2025-09-18
795	Elena Cole	Gig Harbor	WA	98329	United States	2025-09-18
796	Katie Galbraith	Poulsbo	WA	98370	United States	2025-09-18
797	Kathy Townsend	Federal Way	WA	98003	United States	2025-09-18
798	Kelli Johnson	Tahuya	WA	98588	United States	2025-09-18
799	shawn mcandrew	Plant City	FL	33563	United States	2025-09-18
800	Sarah Blossom	Bainbridge Island	WA	98110	United States	2025-09-18
801	Katie Steelman	Bremerton	WA	98312	United States	2025-09-18
802	Garry Qualman	Bremerton	WA	98310	United States	2025-09-18
803	Natalie Schweizer	Seabeck	WA	98380	United States	2025-09-18
804	Kyla Mattioda	Enumclaw	WA	98022	United States	2025-09-18
805	Patricia Gallup	Paulden	AZ	86334	United States	2025-09-18
806	Shelly Sanders	Bremerton	WA	98312	United States	2025-09-18
807	Cheryl Hammon	Kingston	WA	98346	United States	2025-09-18
808	randy gelhaus	Bainbridge Island	WA	98110	United States	2025-09-18
809	Chelsea Wickel	Wenatchee	WA	98801	United States	2025-09-18
810	Kevin Kroll	Port Orchard	WA	98367	United States	2025-09-18
811	Leah Knapp	Bremerton	WA	98311	United States	2025-09-18
812	Cynthia Farrell	Graham	WA	98338	United States	2025-09-18
813	Kim Hughes	Southworth	WA	98386	United States	2025-09-18
814	Janice Rork	Silverdale	WA	98383	United States	2025-09-18
815	Shane Gaston	Poulsbo	WA	98370	United States	2025-09-18
816	Stina Peña	Bainbridge Island	WA	98110	United States	2025-09-18
817	Jamie Corcell	Silverdale	WA	98383	United States	2025-09-18
818	Jennifer Cunningham	Poulsbo	WA	98370	United States	2025-09-18
819	Carrie Dollar	Shelton	WA	98584	United States	2025-09-18

No.	Name	City	State	Postal Code	Country	Signed On
820	Stefanie Arbogast	Tahuya	WA	98588	United States	2025-09-18
821	Caitlynn Hahn-Schnabel	Port Orchard	WA	98524	United States	2025-09-18
822	Aura DiJohn	Bremerton	WA	98312	United States	2025-09-18
823	Kelli Johnson	Bremerton	WA	98312	United States	2025-09-19
824	Klynn Miller	Bremerton	WA	98312	United States	2025-09-19
825	Erik Pease	Bremerton	WA	98311	United States	2025-09-19
826	James Hosford	Poulsbo	WA	98370	United States	2025-09-19
827	Tiffany Antonio	Port Orchard	WA	98366	United States	2025-09-19
828	Tammy Wiest	KINGSTON	WA	98346	United States	2025-09-19
829	Raechel Drill	Bremerton	WA	98311	United States	2025-09-19
830	Deborah Anne	Suquamish	WA	98392	United States	2025-09-19
831	Kristina Joy	Port Orchard	WA	98367	United States	2025-09-19
832	Madison Johnson	Belfair	WA	98528	United States	2025-09-19
833	Justin Peil	Bremerton	WA	98312	United States	2025-09-19
834	Geoff Cross	Kingston	WA	98346	United States	2025-09-19
835	justin carlson	Tahuya	WA	98588	United States	2025-09-19
836	John MacLean				United States	2025-09-19
837	LoriAnn Hartnett	Poulsbo	WA	98370	United States	2025-09-19
838	Evelyn Brown	Lake Stevens	WA	98258	United States	2025-09-19
839	Nancy Kelstrup	Bremerton	WA	98311	United States	2025-09-19
840	Russell Robinson	Chico	CA	95928	United States	2025-09-19
841	Janet Salisbury	Edgewood	WA	98372	United States	2025-09-19
842	Jan Rathe	Poulsbo	WA	98370	United States	2025-09-19
843	Karin Berbaum	Bremerton	WA	98312	United States	2025-09-19
844	Rachel Radtke	Bainbridge Island	WA	98110	United States	2025-09-19
845	Stephanie Major	Bremerton	WA	98312	United States	2025-09-19
846	Liz Kettle	Bremerton	WA	98312	United States	2025-09-19
847	Robert Schoeler	Poulsbo	WA	98370	United States	2025-09-19
848	Genevieve Kramer	Bainbridge Island	WA	98110	United States	2025-09-19
849	Angela McKee	Gig Harbor	WA	98329	United States	2025-09-19
850	Kenzie Dahlhauser	Poulsbo	WA	98370	United States	2025-09-19
851	Gayle Robinson	Port Orchard	WA	98367	United States	2025-09-19
852	Ashley Bolen	Selah	WA	98942	United States	2025-09-19
853	Becky j Elmore	Port Orchard	WA	98367	United States	2025-09-19

No.	Name	City	State	Postal Code	Country	Signed On
854	Kimberly Austin-Ellis	Port Orchard	WA	98367	United States	2025-09-19
855	Jeffrey Green	Port Orchard	WA	98366	United States	2025-09-19
856	Brook Babcock	Port Orchard	WA	98366	United States	2025-09-19
857	Ruby Roark	Mount Airy	MD	21771	United States	2025-09-19
858	Joy Geertsens		WA		United States	2025-09-19
859	Lynn Quiariarte	Port Orchard	WA	98367	United States	2025-09-19
860	Dana Ellis	Port Orchard	WA	98367	United States	2025-09-19
861	Tammy Roberts	Port Orchard	WA	98367	United States	2025-09-19
862	Chase Templeton	Bremerton	WA	98312	United States	2025-09-20
863	Jose Galvan	Silverdale	WA	98383	United States	2025-09-20
864	Jackie Cope	Fort Irwin	CA	92310	United States	2025-09-20
865	Deanne Lynch	Quilcene	WA	98376	United States	2025-09-20
866	Geraldine Wilson-Khalsa	Port Orchard	WA	98367	United States	2025-09-20
867	Chad Eriksen	Gig Harbor	WA	98329	United States	2025-09-20
868	Faith Wagner	Port Orchard	WA	98366	United States	2025-09-20
869	Chris Miller	Seabeck	WA	98380	United States	2025-09-20
870	Shawna Altaffer	Seabeck	WA	98380	United States	2025-09-20
871	Charmain Campbell	Port Orchard	WA	98367	United States	2025-09-20
872	Donna Haxby	Seabeck	WA	98380	United States	2025-09-20
873	Derek Haxby	Bremerton	WA	98312	United States	2025-09-20
874	Randi Paulson	Poulsbo	WA	98370	United States	2025-09-20
875	Merle Pontius	Chimacum	WA	98325	United States	2025-09-20
876	Sheri Tiffany-Schuman	Seabeck	WA	98380	United States	2025-09-20
877	Amanda Kimbley	Bremerton	WA	98311	United States	2025-09-20
878	LISA SMITH	Bremerton	WA	98337	United States	2025-09-20
879	Sherry Ritchie	Port Angeles	WA	98363	United States	2025-09-20
880	Tifany Hoecherl	Port Orchard	WA	98366	United States	2025-09-20
881	Sundance Rogers	Bainbridge Island	WA	98110	United States	2025-09-20
882	Pam Starkey	Port Orchard	WA	98367	United States	2025-09-20
883	Chris Starkey	Silverdake	WA	98383	United States	2025-09-20
884	Vanessa Nygren	Tenino	WA	98589	United States	2025-09-20
885	Jeff Braun	Poulsbo	WA	98370	United States	2025-09-20
886	Cari Pahrman	Bremerton	WA	98312	United States	2025-09-20
887	Samuel Fry	Bremerton	WA	98310	United States	2025-09-20

No.	Name	City	State	Postal Code	Country	Signed On
888	Kathy Pecl	Port Orchard	WA	98367	United States	2025-09-20
889	Harley Howard	Bremerton	WA	98311	United States	2025-09-20
890	SueAnn McClelland	Kingston	WA	98346	United States	2025-09-20
891	Grant Howard	Bremerton	WA	98311	United States	2025-09-20
892	Elaine Howard	Bremerton	WA	98311	United States	2025-09-20
893	Terry Brooks	Port Orchard	WA	98367	United States	2025-09-20
894	Samantha Holman	Home	WA	98349	United States	2025-09-20
895	Nicole Stoddard	Port Orchard	WA	98367	United States	2025-09-20
896	Charlene Watkins	San Clemente	CA	92673	United States	2025-09-20
897	Michael Garvais	Bremerton	WA	98310	United States	2025-09-21
898	Andrea Faber	Poulsbo	WA	98370	United States	2025-09-21
899	Edith Dom	Poulsbo	WA	98370	United States	2025-09-21
900	Angelina white	Poulsbo	WA	98370	United States	2025-09-21
901	Susan Kendell	Silverdale	WA	98383	United States	2025-09-21
902	Brittney Bell	Poulsbo	WA	98370	United States	2025-09-21
903	Kiara Kukes	Port Ludlow	WA	98365	United States	2025-09-21
904	Aster Williams	Port Orchard	WA	98367	United States	2025-09-21
905	Diane Mckenzie	Port Orchard	WA	98366	United States	2025-09-21
906	Keith Silvernale	Port Orchard	WA	98367	United States	2025-09-21
907	Wendy Durig	Bremerton	WA	98312	United States	2025-09-21
908	Tara Grumm	Bainbridge Island	WA	98110	United States	2025-09-21
909	Mara Ortega	Bremerton	WA	98310	United States	2025-09-21
910	Cindy Allpress	Poulsbo	WA	98370	United States	2025-09-21
911	Kimberly Wallingford	Poulsbo	WA	98370	United States	2025-09-21
912	Michelle Clayton	Townsend	MT	59644	United States	2025-09-21
913	Betty Demaris	Poulsbo	WA	98370	United States	2025-09-21
914	Frances May	Westport	WA	98595	United States	2025-09-21
915	Neal Foley	Port Orchard	WA	98367	United States	2025-09-21
916	Karin Kay	Poulsbo	WA	98370	United States	2025-09-21
917	Richard Travelstead	Seattle	WA	98160	United States	2025-09-21
918	Cheryl Abraham	Port Orchard	WA	98367	United States	2025-09-21
919	terri rottle	Port Orchard	WA	98366	United States	2025-09-21
920	Sara Estrada	Port Orchard	WA	98366	United States	2025-09-21
921	Heather Thorene	Seabeck	WA	98380	United States	2025-09-22

No.	Name	City	State	Postal Code	Country	Signed On
922	Sharon Silvernale	Silverdale	WA	98383	United States	2025-09-22
923	Sara Hazama	Seabeck	WA	98380	United States	2025-09-22
924	Peggy Wolf	Kent	WA	98032	United States	2025-09-22
925	Rachel Tiemeyer	Port Orchard	WA	98367	United States	2025-09-22
926	Dan Nohel	Bremerton	WA	98310	United States	2025-09-22
927	Madi Lockhart	Belfair	WA	98528	United States	2025-09-22
928	Micah Stephenson	Seattle	WA	98118	United States	2025-09-22
929	Julie Hammond	Poway	CA	92064	United States	2025-09-22
930	Melissa Ayers	Port Orchard	WA	98367	United States	2025-09-22
931	Brittany Baker	Silverdale	WA	98383	United States	2025-09-22
932	Kristen Jentges	Ellensburg	WA	98926	United States	2025-09-22
933	Carl Ogle	Silverdale	WA	98383	United States	2025-09-22
934	Daniel Trout	Chicago	IL	60602	United States	2025-09-22
935	Coreen Haydock Johnson	Port Orchard	WA	98367	United States	2025-09-22
936	Kathryn Applegate	Port Orchard	WA	98367	United States	2025-09-22
937	Myles Dennis	Port Orchard	WA	98367	United States	2025-09-22
938	Deanne Cano	Bellingham	WA	98225	United States	2025-09-22
939	John Adams	Port Orchard	WA	98367	United States	2025-09-22
940	stephen mats mats	kingston	WA	98346	United States	2025-09-22
941	Ethan Crittenden	Gig Harbor	WA	98329	United States	2025-09-22
942	Ryleigh Rodenburg	Mora	MN	55051	United States	2025-09-22
943	Debby Campbell	Silverdale	WA	98383	United States	2025-09-22
944	Julene Nikolac	Port Orchard	WA	98366	United States	2025-09-22
945	Carrie Whitlow	Port Orchard	WA	98367	United States	2025-09-22
946	D Woods ■	Port Orchard	WA	98367	United States	2025-09-23
947	Cindee Cisneros	Port Orchard	WA	98367	United States	2025-09-23
948	Danielle Bremer	Finley	ND	58230	United States	2025-09-23
949	Cecelia Silvernale	Port Orchard	WA	98367	United States	2025-09-23
950	Emily Wilmot	Poulsbo	WA	98370	United States	2025-09-23
951	Gage Berger	Seattle	WA	98144	United States	2025-09-23
952	Rebecca Winters	Port Angeles	WA	98362	United States	2025-09-23
953	Kimberly Wolfe	Bremerton	WA	98312	United States	2025-09-23
954	Jennifer Prendergast	Poulsbo	WA	98370	United States	2025-09-23
955	Marie Everett	Bremerton	WA	98312	United States	2025-09-23

No.	Name	City	State	Postal Code	Country	Signed On
956	Beth Hill	Poulsbo	WA	98370	United States	2025-09-23
957	Denice Dato	Port Orchard	WA	98367	United States	2025-09-23
958	Mary Avery	Poulsbo	WA	98370	United States	2025-09-23
959	Talia Fening	Belfair	WA	98528	United States	2025-09-23
960	christopher passman	Port Orchard	WA	98366	United States	2025-09-23
961	Jennifer Stevenson	Gig Harbor	WA	98332	United States	2025-09-23
962	Reese Hill	Temple	WA	98370	United States	2025-09-23
963	Flordelina Tero	Manila			Philippines	2025-09-23
964	Kyle Jamera	Manila			Philippines	2025-09-23
965	Helen Leuthner	Lake Grove	NY	11755	United States	2025-09-23
966	Edward Markushewski	Huntsville	AL	35801	United States	2025-09-23
967	John Lembo	Corpus Christi	TX	78416	United States	2025-09-23
968	Lindsay Mjor	Bremerton	WA	98312	United States	2025-09-23
969	DeAnn Bauer	Port Orchard	WA	98367	United States	2025-09-23
970	David Nash	Arlington	WA	98223	United States	2025-09-23
971	Sarah Walling	Castleton On Hudson	NY	12033	United States	2025-09-23
972	CINDY SNYDER	TUCSON	AZ	85705	United States	2025-09-23
973	Jeri Williams	Taylors	SC	29687	United States	2025-09-23
974	Katherine Teal	Olalla	WA	98359	United States	2025-09-23
975	Ronald Collamore	Lincoln	NE	68502	United States	2025-09-23
976	Betsy Carmona	Port Orchard	WA	98366	United States	2025-09-23
977	Gary Haider	Tehachapi	CA	93561	United States	2025-09-23
978	Bethany McKibben	Silverdale	WA	98383	United States	2025-09-23
979	Darcy Howell	Port Orchard	WA	98367	United States	2025-09-23
980	Daniel Orr	Kingston	WA	98346	United States	2025-09-23
981	Ismael van Valle	Everett	WA	98201	United States	2025-09-23
982	Stephanie Ryan	Poulsbo	WA	98370	United States	2025-09-23
983	Bonnie Block	Kingston	WA	98346	United States	2025-09-24
984	Hannah selby	Port Orchard	WA	98367	United States	2025-09-24
985	Steve Geikow	Wheeling	IL	60090	United States	2025-09-24
986	kathy grieves	glendale	AZ	85308	United States	2025-09-24
987	Maurice Vaughan	Greenville	NC	27834	United States	2025-09-24
988	Hunter Chandler	Chetopa	KS	67336	United States	2025-09-24
989	Etzar Cisneros	Birmingham	AL	35206	United States	2025-09-24

No.	Name	City	State	Postal Code	Country	Signed On
990	Kellie McIntyre	Port Orchard	WA	98367	United States	2025-09-24
991	Janna Perkins	ROMAYOR	TX	77368	United States	2025-09-24
992	Annne Ryan	Bainbridge Island	WA	98110	United States	2025-09-24
993	Ronni Taylor	Port Orchard	WA	98367	United States	2025-09-24
994	Daniela Rossi	Pomezia	ID	83756	United States	2025-09-24
995	Sherry Hamrick	Ewa Beach	HI	96706	United States	2025-09-24
996	Denie English	Estancia	NM	87016	United States	2025-09-24
997	Teagan Ressler	Federal Way	WA	98023	United States	2025-09-24
998	Marcus Gottlieb	Highland Park	IL	60035	United States	2025-09-24
999	Becky Moore	Port Orchard	WA	98366	United States	2025-09-24
1000	Lee ann Beauchamp	Olympia	WA	98513	United States	2025-09-24
1001	Pam Campbell	Grandview	TX	76050	United States	2025-09-24
1002	Aidan Sievertson	Poulsbo	WA	98370	United States	2025-09-24
1003	Sheri Olsen	Kirkland	WA	98033	United States	2025-09-24
1004	Maddie Murdock	Manchester	CT	06042	United States	2025-09-24
1005	Ryan Kok	Poulsbo	WA	98370	United States	2025-09-24
1006	Betsy Wallwork	Poulsbo	WA	98370	United States	2025-09-24
1007	Lacey Wilmot	Suquamish	WA	98392	United States	2025-09-24
1008	Amber Star	Grants Pass	OR	97527	United States	2025-09-24
1009	Samuel Hawkins	Port Orchard	WA	98366	United States	2025-09-25
1010	Bob Darmiento	Port Orchard	WA	98367	United States	2025-09-25
1011	Jerry Mouse Martinez	Estero	FL	33929-0171	United States	2025-09-25
1012	Lenora ONeill	Toledo	WA	98591	United States	2025-09-25
1013	L C		HI		United States	2025-09-25
1014	Doris Kitchen	Hendersonville	NC	28739	United States	2025-09-25
1015	Angelique Zayas	North Miami	FL	33161	United States	2025-09-25
1016	Melinda Kinnaird	Hot Springs National Park	AR	71913	United States	2025-09-25
1017	Kendra Williams	Seattle	WA	98126	United States	2025-09-25
1018	Antonia Oliver	Bremerton	WA	98312	United States	2025-09-25
1019	Barbara Tait	Shorewood	IL	60404	United States	2025-09-25
1020	McCanna Sanders	Shelton	WA	98584	United States	2025-09-25
1021	Barbara Coven-Ellis	Poulsbo	WA	98370	United States	2025-09-25
1022	Nikki Houde	Seabeck	WA	98380	United States	2025-09-25
1023	Desiree Field	Port Orchard	WA	98366	United States	2025-09-25

No.	Name	City	State	Postal Code	Country	Signed On
1024	Vicki Frazier	Gig Harbor	WA	98329	United States	2025-09-25
1025	Ayla Badertscher	Port Orchard	WA	98367	United States	2025-09-25
1026	Jack Ward	Port Orchard	WA	98366	United States	2025-09-25
1027	Susan Haussmann-Collins	Bremerton	WA	98311	United States	2025-09-25
1028	Matthew Foster	Bremerton	WA	98312	United States	2025-09-25
1029	julia king	Port Orchard	WA	98366	United States	2025-09-26
1030	Samantha Strack	Gig harbor	WA	98332	United States	2025-09-26
1031	Caron Sanderson	Graham	WA	98338	United States	2025-09-26



SQUAXIN ISLAND TRIBE

SENT BY ELECTRONIC MAIL

October 3, 2025

Heather Cleveland, AICP
Long Range Planner
Kitsap County Department of Community Development
614 Division St, MS-36
Port Orchard, WA 98366
Email: hcleveland@kitsap.gov

Re: Rural and Resource Lands Element of the Kitsap Comprehensive Plan

Dear Ms. Cleveland,

Thank you for continued engagement between county staff and Tribes on the Kitsap Comprehensive Plan update, and now the Rural and Resource Lands Element (“rural element”).

Watersheds that drain the southern end of Kitsap County, into Case and Carr Inlet, are the Squaxin Island Tribe’s usual and accustomed fishing area (“U&A”). The Squaxin Island Tribe is a federally recognized Indian tribe with treaty rights to harvest fish and shellfish, “at their usual and accustomed fishing places in the shallow bays, estuaries, inlets and open Sound of Southern Puget Sound and in the freshwater streams and creeks draining into those inlets.”¹ Anadromous fish, and particularly salmon, have played a central role in the Tribe’s subsistence, economy, culture, spiritual life and day-to-day existence. The Tribe is adjudicated to be a successor-in-interest to signatories of the Treaty of Medicine Creek, 10 Stat. 1132 (hereinafter “Treaty”), by which the Tribe reserved various rights, including the right to exercise off-Reservation fishing rights at its U&A”. Therefore, the fate of freshwater in Kitsap County is of great concern to the Tribe.

We appreciate these aspects of the current draft of the County’s rural element that commit to protection of surface water and groundwater:

p. 2 “Safeguard natural surface water flows, groundwater recharge, and discharge areas, ensuring clean water systems and resilient hydrology.”

p. 3 This element is in coordination with rural and resource lands Goals 8 and 9 of the Washington Growth Management Act, which protect fisheries, fish and wildlife, and water resources.

p. 3 “Protecting critical areas, as provided in RCW 36.70A.060, and surface water and groundwater resources.”

¹ See generally *United States v. Washington*, 384 F.Supp. 312, 378 (W.D. Wash. 1974); *United States v. Washington*, 459 F.Supp. 1020 (W.D. Wash. 1978)

p. 22 Rural Environment- “Goal. Protect natural ecosystems and resources in the rural area, including ground and surface waters, soils, and forested areas.”

“Policy. Assess and improve understanding of the management, capacity, and regulatory compliance of rural Group B water systems.”

We request that you insert text into the rural element as identified in *italics* in the pages below.

p. 22 Please insert as a policy under Rural Environment- “Goal. Protect natural ecosystems and resources in the rural area, including ground and surface waters, soils, and forested areas.”

Policy. Recognize the connection of wells to groundwater and streamflow. Facilitate the WRIA 15 Watershed Restoration and Enhancement Committee. Actively seek, sponsor, and implement permit-exempt well offset projects.

p. 4 Please insert into the other applicable state laws section of the rural element: [RCW 90.94 Streamflow Restoration](#)

The Tribe submitted comments to Kitsap County during the recent Comprehensive Plan update about permit-exempt wells. Understanding that the County deferred discussion of rural issues to the Year of the Rural, we waited until the Year of the Rural to verify that permit-exempt wells would be addressed. The need for rural housing units is addressed in the Comprehensive Plan, and that is tightly linked to the number of permit-exempt wells that will be drilled in rural areas. These may be private single party, two party, or small Group B water system wells. The Tribe requests that the County insert some basic information about permit-exempt wells and water systems into the rural element. This information is already available in the form of rough estimates from Kitsap Public Health.

Please insert the below information about wells and water systems into the rural element.

- *There are approximately 16,700 exempt private and two-party private wells in the County (including Bainbridge Island).*
- *5,278 of those wells are believed to be two-party private wells.*
- *The spatial distribution of these wells, based on commissioner districts, is roughly:*
 - *Bainbridge Island- 2,170*
 - *North Kitsap- 5,515*
 - *Central Kitsap- 3,170*
 - *South Kitsap- 5,845*
- *There are 808 Group B Water systems in Kitsap County. One hundred and sixty of those water systems have a water right, so 648 of those are permit-exempt.*
- *The spatial distribution of these water systems, based on commissioner districts, is roughly:*
 - *Bainbridge Island- 135*

- North Kitsap- 285
- Central Kitsap- 180
- South Kitsap- 208

Relationship of the Comprehensive Plan to the WRIA 15 Watershed Restoration and Enhancement Plan

“The purpose of the Water Resource Inventory Area (WRIA) 15 Watershed Restoration and Enhancement Plan is to identify projects and actions intended to offset the impacts of new domestic permit-exempt (PE) wells to streamflows. The Watershed Restoration and Enhancement Plan is one requirement of RCW 90.94.030. Watershed Restoration and Enhancement Plans must identify projects to offset the projected consumptive impacts of new PE domestic groundwater withdrawals on instream flows over 20 years (2018-2038) and provide a net ecological benefit (NEB) to the WRIA.”²

As estimated in the WRIA 15 Watershed Restoration and Enhancement Plan² (WREP), an additional 5,215 wells could be drilled in the timeframe of 2018-2038. If you remove the subbasins that approximately overlap with Mason, Pierce, and King Counties from that projection, approximately 2,200 wells could be drilled in the Kitsap County portion of WRIA 15. In the County’s comprehensive plan³, the housing allocation to unincorporated Kitsap County is 14,498 housing units, out of 32,950 total county housing units in the next twenty years. Of those 14,498 rural housing units, it appears that 2,418 housing units could be outside the urban growth areas.⁴ It is good to know that the WRIA 15 WREP’s forecast of ~2,200 permit-exempt wells is similar in magnitude to the ~2,418 housing units or rural capacity in the County’s housing element technical analysis.⁴

Please insert the following text into the rural element:

An estimated 2,200 to 2,400 rural permit-exempt wells could be drilled in unincorporated Kitsap County, outside the urban growth areas, in the next twenty years. Kitsap County will actively track the number of permit-exempt wells drilled annually in the County. The County will commit to evaluating the offset projects in the WRIA15 Watershed Restoration and Enhancement Plan, incorporating new projects (if more effective projects arise), sponsoring them, and following them through to completion. If the pace of permit-exempt well development is faster than project development, the County will accelerate project development and implementation.

The Tribe is pleased to know that Kitsap Department of Community Development has just reinitiated the WRIA 15 Watershed Restoration Planning Committee, with participation by other County Departments. This makes us optimistic that the County can find quality projects, vet those projects, sponsor them, and enlist the help of many partner entities to see them through to

² Watershed Restoration and Enhancement Plan WRIA 15, Kitsap Watershed, Adopted by Ecology December 2024
Publication: 22-11-017

³ Kitsap County Comprehensive Plan, p. 112-115

⁴ Housing Element Technical Analysis, Kitsap County, July 8, 2024, Section 4.4, Table 10

completion. Together with the Kitsap Natural Asset Management Plan, this is a huge step in the right direction.

The Squaxin Island Tribe looks forward to collaborating with Kitsap County to do watershed planning and to find meaningful streamflow restoration projects.

Sincerely,

A handwritten signature in black ink that reads "Christine Erica Marbet". The signature is written in a cursive, flowing style.

Erica Marbet
Water Resources Biologist
Squaxin Island Tribe

November 5, 2025

TO: Kitsap Board of County Commissioners
FROM: Kitsap Environmental Coalition (KEC)
RE: Comments on Kitsap County Year of the Rural Documents for BOCC Public Hearing

The Kitsap Environmental Coalition (KEC), as a key stakeholder, has carefully reviewed the draft *Rural and Resource Lands (R&RL) Chapter* and the *Reclassification Requests Staff Report*, with particular attention to environmental considerations.

We thank Heather Cleveland for her leadership in organizing the County's outreach, which has enabled community participation in this critical process. Below are KEC's overarching comments and recommendations.

Rural and Resource Lands (R&RL) Chapter. We appreciate the Planning Commission's additions to the R&RL chapter in response to public input (Goal 17; Policy 13.5; and Strategy 12.a). We build on their work with important enhancements that can significantly strengthen environmental protection, climate resilience, and sustainability in Kitsap County.

1. **Wildlife corridors and habitat connectivity:** In addition to the inclusion of Goal 17 to address wildlife corridors and habitat connectivity, we urge careful consideration of the differing needs of species and the complexities of maintaining functional corridors.
2. **Protect Critical Areas:** We urge the following enhancements to support the Critical Areas Ordinance.
 - a. **Wetlands and stream protection:** Update County mapping of wetlands and streams to include their protective buffers – as the City of Poulsbo has done with their mapping of [fish-bearing stream buffers](#). Display of buffers on the Parcel Search tool would accurately inform prospective builders of CAO restrictions. Such maps also help correlation of wildlife corridors.
 - b. **Water quality and quantity:** The new Policy 13.5, which calls for identifying and protecting natural areas contributing to aquifer recharge, is essential to safeguarding both water quality and water quantity. *Recommendation:* Revise the *Rural Character Definition* to reference both water quality and quantity, as the current language includes only water quality.
3. **Nonmotorized transportation (Strategy 12.a):** We commend the greater attention to safe nonmotorized travel in rural areas (Strategy 12.a) and recommend an added emphasis on connecting communities to promote accessibility, safety, and social cohesion.
4. **Support local agriculture:** Establish and maintain a strong Agricultural Advisory Council to advise the County on policies and codes that include ensuring a resilient local food system in the face of changing climate conditions. (Note that we have not submitted comments

on Agricultural Codes, as we believe it is first essential to establish an Agricultural Advisory Council, which should then play a central role in code development and revisions.)

5. **Support best available science use:** Promote forestry and agricultural practices grounded in Best Available Science, that support long-term land and forest health and climate resilience.

Reclassification Requests. KEC reviewed the Staff Report on the three reclassification requests with focus on environmental impacts, legal mandates, and consistency with the Kitsap County Code (KCC). We considered factors including past permit denials, public input, and the multiple criteria required under two KCC sections.

While we recognize that reclassifications may sometimes be appropriate, the County Code requires that all criteria be met—a standard these requests do not fulfill. The burden of proof lies with the applicant and they have not met that burden of proof. Thus, we oppose the proposed reclassification requests. *See Attachment A* for details on our analysis.

We also recommend the BOCC:

1. **Establish Clear Guidance for Future Applications**

Require applicants to address environmental conditions explicitly and demonstrate full compliance with the Critical Areas Ordinance.

2. **Ensure Transparency and Public Engagement**

Announce the next application period for rezone and land designation requests well in advance to allow meaningful public participation.

We appreciate the Planning Commission's dedication to the Year of the Rural review, though we note their limited time and data hindered a thorough evaluation of the reclassification requests.

Implementation and Ongoing Review. Once the R&RL Chapter is adopted, we urge the BOCC and relevant departments to conduct regular, transparent reviews of the chapter's implementation. Turning goals and policies into real-world outcomes requires consistent monitoring, public reporting, and adaptive management.

Sincerely,

KEC Board: Martha Burke, Bob Gilby, David Onstad, Beverly Parsons, Russ Sciandra, Dave Shorett

KEC Year of the Rural Working Group: Marion Allen, Martha Burke, Joe Forsthoffer, Joe Lubischer, Beth Nichols, Doug Hayman, Paul Larson, Beverly Parsons, Carol Price, April Ryan, Robin Salthouse, Dave Shorett, Margaret Tufft, Pat Weagant, Steve Weagant



Attachment A: KEC's Key Considerations about Reclassification Requests

Condition	A. APP-ID: 07 Skrobut-McCormick Lands CO	B. App-ID: 57 Moran	C. App-ID: 66 Stokes/Campbell
Current vs. Proposed Zoning	RW to RI or RCO	RR to RI	RP to Rural Commercial
Code Violations or Record of Denied Permits	None	Yes, code violations for same owner in adjacent property	Yes, reclassifications requests denied in 2006, 2009, and 2015
Public Comment	1 comment. Concern about proximity to Coulter Creek Heritage Park and potential impacts on nearby recreation, habitat, and rural character; unmet need not demonstrated	2 comments. Concerns about code compliance and land use compatibility. Would reclassification reward non-compliant behavior? Presence of wetlands, erosion hazards, and other critical areas making property unsuitable for industrial use. Strong preference for maintaining existing designation and ensuring compliance issues are resolved before any rezone consideration	3 comments. Environmental constraints. Overall strong opposition based on environmental and policy consistency groups
General Criteria KCC 21.08.07.A 3 criteria	General Criterion #1 not met: no change in conditions since 2024 and 2016 Comp Plan to justify zoning change	General Criterion #1 not met: no change in conditions since 2024 and 2016 Comp Plan to justify zoning change	General Criterion #3 not met: encumbered by critical areas and buffers; reclassification would lead to incompatible adjacent land uses and encourage other nearby properties to request conversion
Site Specific criteria KCC 21.08.07.D 6-7 criteria	No existing unmet need established (Specific criterion a)	Site is significantly encumbered by critical areas and buffers (Specific criterion c)	No existing unmet need established (Specific criterion a)
KEC position	Oppose proposed rezoning	Oppose proposed rezoning	Oppose proposed rezoning

Dear Scott Diener,

The Washington Department of Fish and Wildlife (WDFW) is dedicated to preserving, protecting, and perpetuating the state's fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities.

In recognition of our responsibilities, we submit the following comments on the October 2025 draft Rural and Resource Lands Element 2.0 for Kitsap County as part of the current periodic update under the Growth Management Act (GMA), acknowledging that other comments may be offered in the future. We strive to maintain contact throughout this update process and look forward to future engagement opportunities.

- For the Rural Character Definition, WDFW suggests updating the language to, “Protect and connect wildlife corridors, fish and wildlife habitat and other critical areas, and ensure coexistence with wildlife, while supporting fire resilience, healthy ecosystems, and ecosystem services.” Habitat connectivity is one of WDFW's main land use priorities and while our Agency does currently support this portion of Kitsap County's rural character definition, we believe it could be improved by including the connection aspect into this definition. Additionally, WDFW suggests adding in “ecosystem services” into this portion of the definition so that the benefits that the public enjoys as a result of natural processes and biological diversity found at these sites are recognized, consistent with RCW 76.09.020.
- WDFW suggests updating the Rural and Resource Lands Policy 1.8 to, “Regularly evaluate conservation programs and educational initiatives to protect sensitive or resource lands while allowing development in appropriate locations, using tools such as Purchase of Development Rights (PDR), Transfer of Development Rights (TDR), and performance-based development (PBD) to balance conservation and growth. Explore ways to encourage environmental protection on priority properties through the use of these tools or the county or partners purchasing properties for permanent conservation.”. WDFW encourages the County to expand this policy to explore ways to protect properties that have critical areas, locally important habitats, or wildlife corridors by using the tools currently covered in this policy or through the use of acquisition. For educational resources, please visit the Landscape Planning for Washington's Wildlife: Managing for Biodiversity in Developing Areas publication and the WDFW Habitat at Home program.

- WDFW suggests updating the Rural and Resource Lands Strategy 1.c to “Prepare a Rural Lands Analysis (RLA) which evaluates current status and future projections for the rural area regarding land use and development trends, land capacity, compatibility of neighboring land uses, availability and adequacy of rural infrastructure, urban/rural boundaries, locations of wildlife corridors and habitat connectivity locally and regionally, transfers and purchases of development rights, and other rural issues. The RLA should be updated regularly to inform periodic updates to the BLR and Comprehensive Plan.”. WDFW encourages the County to explicitly state that both local and regional wildlife corridors and habitat connectivity are being taken into consideration to align with WAC 365-196-335. Improvements to habitat connectivity networks reduce habitat fragmentation and can reduce wildlife conflicts since wildlife have a movement corridor to avoid humans. For resources on these efforts, please visit the WDFW Priority Habitat and Species website and the Washington Habitat Connectivity Action Plan website for interactive maps and connection reports.
- WDFW is supportive of the Rural and Resource Lands Policy 2.1. For protection on agricultural lands, WDFW suggests enrolling in the Voluntary Stewardship Program (VSP) to create a non-regulatory approach to meeting the goals of the state of Washington's Growth Management Act by protecting critical areas on agricultural lands. Enrollment is currently open to new counties. WDFW also suggests that the County consider exploring the Menu of Measures resource provided by the Department of Commerce regarding goals for forest management plans, forestland ownership, and preservation of long-term agriculture uses, recreation, open spaces with rural character.
- WDFW suggests updating the Rural and Resources Lands Policy 13.1 to: “Recognize and value water as a necessary asset for agricultural uses, while balancing this resource as a critical environmental element to the natural ecosystem.”. WDFW acknowledges that water is a necessary asset for agriculture, however, as written it may read as if water is not an asset otherwise. WDFW suggests expanding this policy that highlights that water is also a key element to critical areas and the natural ecosystems that rely on water.
- WDFW suggests updating the Rural and Resources Lands Policy 13.3 to: “Coordinate with Kitsap Natural Resource Asset Management Project to develop and implement watershed plans.”. WDFW encourages the County to explicitly include a statement that these plans should be implemented after they have been

developed so that these plans continue to be used after development. Additionally, we suggest utilizing the Sound Choices Checklist in further review of all Comprehensive Plan elements. This checklist utilizes broad priorities that are applicable to all Puget Sound jurisdictions.

Thank you for taking the time to consider our recommendations for your comprehensive plan to better reflect the best available science for fish and wildlife habitat and ecosystems. We value the relationship we have with your jurisdiction and the opportunity to work collaboratively with you throughout this periodic update cycle.

If you have any questions, need our technical assistance or resources at any time during this process, please don't hesitate to contact me at 360-701-7705 or at Lindsay.Wourms@dfw.wa.gov, or Region 6's Regional Land Use Lead, Jessica Bryant, Jessica.Bryant@dfw.wa.gov.

11/8/2025. ID 395. Stacy Marshall

Submitting as the Public Outreach Lead on behalf of the Kitsap Farmland Preservation Coalition (<https://preservekitsapfarms.org>).

GENERAL COMMENTS: The Rural Chapter presents an opportunity for Kitsap County to establish goals and policies and implement strategies to support vibrant agriculture and forestry sectors and a robust, resilient and accessible local food system. To track progress towards these goals and keep the county, landowners and advocacy groups accountable the strategies must be stated.

The Draft Rural Chapter as currently written lacks a robust suite of strategies to advance the goals and policies in the chapter. In particular, the Kitsap Farmland Preservation Coalition finds the dearth of strategies to preserve agricultural lands and support the local food system distressing and proposes the inclusion of strategies to promote and protect agricultural activities in the rural zones. We must proactively conserve agricultural and forested lands, and adopt innovative approaches to farmland beyond conservation easements, purchase and transfer of development rights to include mitigation measures for the loss of farm and forest land to development, incentives for landowners to conserve their land, and land access programs for new and beginning farmers.

The 2024 Comprehensive Plan contains goals and policies promoting and supporting food in the land use and economic development chapters. See:

- Land Use Goal 8. Food security, systems, and production Promote food security, food systems, local food production, and public health by encouraging locally based food production, distribution, and choice and
- Economic Development Policy 5.5. Expand access to affordable healthy food and the community's capacity to produce, process, and distribute local foods.

However, missing from these goals is the basic fact that without farms there is no food. Let us say that again. NO FARMS NO FOOD! Without sufficient effort in the coming years, guided by the goals, policies and strategies in the Rural Chapter of the Comprehensive Plan, Kitsap will continue to see conversion of working lands to non-agricultural uses and loss of farmland now producing food for our communities. We know these changes are irreversible – but they are not inevitable.

To that end, the Rural Chapter must include additional policies and strategies with a laser focus on these issues.

- Rural Development Goal: Retain the rural character of the County outside of designated urban growth areas (UGAs).

- NEW Policy: Promote and support the preservation of agricultural lands and activities within the unincorporated areas of the county, and to make that position known to all citizens currently living in or intending to move into this area to address issues of land use compatibility
- Policy: Direct housing development and urban-type land uses, facilities, and services into UGAs.
- NEW Strategy: Prior to allowing a city annexation or urban growth area expansion, require completion of an agricultural impact statement that sufficiently addresses the concerns raised.
- Policy: Limit development in the rural area to appropriate rural uses not characterized by urban growth patterns or the need for urban-level services and facilities.
- Strategy: Review and revise as necessary standards and development regulations for the rural area to preserve rural character.
- NEW Strategy: Relieve the pressure to develop agricultural land by requiring cities to allow more options for in-fill housing, such as accessory dwelling units, duplexes, triplexes, and townhomes.
- NEW Strategy: Provide a separate website with agriculture specific practices and regulatory requirements with an emphasis on common agricultural practices vs. land disturbing activities.
- Strategy: Develop and adopt design and development standards for rural areas outside of LAMIRDs and rural villages to help preserve visual and land use compatibility between development and the County's rural areas.
 - COMMENT: Design standards, while appropriate for urban and suburban areas of the county, can limit agricultural activity. Brush clearing, ditch maintenance, plowing and other land disturbing activities can be normal on farms. While commercial agricultural activities are typically excluded from an SDAP under Kitsap County Code (12.10.040 Exemptions) it is possible that these activities can be interpreted erroneously. A complaint from a neighbor about a common agricultural practice can lead to an expensive and time-consuming process for the farmer.
- Policy: Limit the rural area to low residential densities that can be sustained by minimal infrastructure improvements, cause minimal environmental degradation, and that will not cumulatively create the future necessity or expectation of urban levels of service.

- NEW Strategy: Develop rural permitting processes to allow agricultural accessory uses including agritourism and assembly events where urban levels of infrastructure and service are not available.
- NEW Strategy: Acknowledging that farmland will continue to be developed, establish farmland loss mitigation regulations requiring permanent protection of farmland to balance out farmland lost to development. Require agricultural mitigation for all development projects that change agricultural land to non-agricultural land as well as discretionary land use approvals that change agricultural uses to non-agricultural uses.
- Policy: Permit residential uses in rural areas in a variety of rural lot sizes consistent with the designated land use and zoning of the surrounding area. Clustering may be allowed where appropriate.
 - COMMENT: As the majority of Kitsap has been reduced to the minimum lot size in RR zones (1 DU/5A) a goal to limit to “low residential densities” is largely a moot point. Currently the Comprehensive Plan Land Use Designation for Rural Wooded with a density of 1 dwelling unit per 20 acres reads in part “[this zone] is intended to encourage the preservation of forest uses and agricultural activities, retain an area’s rural character and conserve the natural resources while providing for some rural residential use. This zone is further intended to discourage activities and facilities that can be considered detrimental to the maintenance of timber production. Residents of rural wooded (RW) residential tracts shall recognize that they can be subject to normal and accepted farming and forestry practices on adjacent parcels. This is the ONLY zone that specifically focuses on the preservation of lands for agricultural activities – but in real practice it preserves timber land – and it is extremely difficult if not impossible to convert timber land to agricultural activities in Kitsap.
- NEW Strategy: Amend the RP and RR zone definitions to include the same outcome as the RW Zone – preservation of agricultural activities along with the same protections – residents shall recognize they can be subject to normal and accepted farming practices on adjacent parcels. Policy. Based on the Rural Lands Analysis, revise comprehensive plan goals, policies and strategies, and associated development regulations, as needed to ensure that land use planning, development, and regulatory requirements adequately address rural lands.
- NEW Strategy: Review Chapter 17.455 – the Agricultural Code enacted in 2016 every five years.
- NEW Strategy: Provide a separate website with agriculture specific practices and regulatory requirements with an emphasis on common farm-based businesses.

Assign a planner with expertise in Chapter 17.445 to respond to all inquiries regarding accessory agricultural uses.

- Policy. Evaluate legacy (pre-GMA) lots to identify opportunities for aggregation, shared use, or other mechanisms that support viable rural and agricultural uses, taking into account the challenges and constraints these lots pose for conventional development, while maintaining rural character and minimizing impacts.
- NEW Strategy: Incentivize lot line adjustments and aggregation of smaller parcels by a single landowner to further reduce rural densities.
- Policy. Regularly evaluate conservation programs and educational initiatives to protect sensitive or resource lands while allowing development in appropriate locations, using tools such as Purchase of Development Rights (PDR), Transfer of Development Rights (TDR), and performance-based development (PBD) to balance conservation and growth.
- NEW Strategy: Participate in regional coordination efforts to expand the applicability of Transfer of Development Rights programs for agricultural lands and increase the number of receiving sites for development rights both in and outside Kitsap County.
- NEW Strategy: Engage stakeholders every five years to review the Kitsap County Agricultural Code and associated regulations impacting farmers.
- Resource Lands and Working Lands Goal. Protect and conserve Kitsap County's designated resource lands and working lands.
- Policy. Recognize and support working lands—such as farms, forests, and other resource-based uses—as contributing to the conservation of open space, protection of natural resources, and preservation of rural character, while sustaining economic viability.
- NEW Strategy: Promote and support the preservation of agricultural and resource lands and activities in the rural zones and to make that position known to all citizens currently living in or intending to move into this area.
- Policy. Support the long-term preservation and economic viability of resource lands by implementing and promoting incentive-based tools
 - COMMENT: The American Farmland Trust identified ineffective agricultural zoning as the foremost problem to prevent the conversion of farmland. They suggest including all currently farmed land in agricultural zones as the most effective strategy to stop conversion of farmland to non-farm uses. While this option seems unlikely in Kitsap County for several reasons, including a commercial agricultural zone in land use tables remains a slim possibility.

- NEW Strategy: Allow landowners to designate rural parcels of “agricultural lands of local importance” per WAC 365-190-050 (6) to afford additional protections to their parcels.
- NEW Strategy: Adopt secondary strategies for farmland preservation, specifically economic development for farmers, TDR and PDR programs, and tax programs, to preserve remaining agricultural lands.
- NEW Strategy: Create a voluntary agricultural district and incentivize farmer enrollment in the districts with additional protections for enrollees. NEW Strategy: Engage with regional partners to develop policies and programming to expand TDR programs beyond Kitsap County and to include all Puget Sound Counties Goal. Conserve and support forest lands to sustain forestry, ensure compatibility with surrounding uses, and strengthen rural resource-based economies.
- Policy. Encourage owners of private forestland and designated Forest Resource Lands to keep these properties forested, and continuing timber production.
- Strategy. Reduce loss of forestland and designated Forest Resource Lands through forest stewardship, education, local and state tax benefits, and incentives for forest landowners and the timber industry to keep forest lands in production.
- NEW Strategy: Participate in the Washington State University Puget Sound Extension Forestry program to increase landowner access to workshops, seminars and webinars to assist them in developing Forest Stewardship Plans and help qualifying landowners enroll in reduced property tax or conservation cost-share grant programs.
- NEW Strategy: Promote the regional Conservation District Forestry Program to increase access to technical assistance for forest landowners.
- Goal. Conserve and enhance agricultural lands to sustain farming, protect rural character and environmental quality, and strengthen Kitsap’s agricultural economy.
- Policy: Maintain and enhance the viability of agricultural uses and activities in rural areas, including cultivation, animal husbandry, and value-added production while protecting the environment. Policy. Promote industrial and commercial uses associated with agriculture in the RI and RCO zones.
- NEW Policy: Update the Kitsap County Strategic Plan for Agriculture every five years to assess and evaluate strategies supporting the economic viability of agriculture and implement research-based approaches to support agricultural uses.
- NEW Strategy: Develop and adopt criteria for permitting temporary farm worker housing standards and policies to allow for construction of farm worker housing and infrastructure.

- Strategy. Develop and adopt policies with appropriate local, county, and state agencies to promote viable coordinated water resources for greater accessibility to water rights for agriculture usage.
 - COMMENT: The Washington Food Policy Forum seeks to expand access to water rights for agricultural use, but this is outside the purview of a county Comprehensive Plan. Washington Department of Ecology also states that all water rights in Kitsap have been allocated.
- NEW Strategy: Work with PUDs and other public water providers to develop an agricultural rate schedule to reduce water costs for farmers.
- NEW Strategy: Explore options for reclaimed water (purple pipe) for agricultural uses and other options with public utility districts
- NEW Strategy: Create an irrigation district and/or water bank to create access to water for farmers without water rights
- NEW Strategy: Conduct an inventory of water rights in Kitsap Strategy. Encourage preservation of historic farms through the development of a historic farm designation program.
 - COMMENT: This serves no purpose at the county level as it offers no protection for farms and working landscapes nor does it prevent conversion to non-agricultural uses. Where appropriate landowners can register barns and agricultural buildings with the Washington Heritage Register. This identifies and documents significant historic resources throughout Washington at the state level including the Heritage Barn Register which specifically recognizes agricultural resources in the state.
- Policy. Coordinate with federal, state, and local governments, community groups, and private landowners to promote long-term preservation of farmlands.
- NEW Strategy: Create and maintain a Farmland Preservation Strategic Plan by conducting an inventory of farms suitable for conservation, prioritize parcels for preservation using an evaluation matrix and pursue funding from federal, state and local sources to preserve farms through established strategies.
- NEW Strategy: Adopt secondary strategies for farmland preservation, including economic support for farmers, TDR and PDR programs, tax programs, and innovative strategies for preserving small acreage farms including farmland mitigation programs, value reduction options, and monetization of ecosystems services.
- NEW Strategy: Adopt an asset management approach to agricultural lands and working landscapes and prioritize agricultural and open space land in planning processes.

- NEW Strategy: Include agricultural lands in the Kitsap Resource Asset Management Program, quantify the value of ecosystems services provided by those parcels and explore strategies to monetize the value of those services as a vehicle to preserve working landscapes.
- NEW Strategy: Dedicate 25% of County Conservation Futures Funding for preservation of working landscapes and farms annually.
- NEW Strategy: Promote the Agriculture Current Use Taxation Program to increase participation in the program
- NEW Strategy: Adopt a “no-net-loss” policy for agricultural lands.
- Strategy. Form an Agriculture Advisory Council to inform the agricultural community about development of future policies and regulations and act as a resource to farmers regarding incentives and other assistance programs.
 - COMMENT: The formation of the Agricultural Advisory Council is the FIRST priority for the Kitsap Farmland Preservation Coalition. The current proposal arose out of a meeting with Commissioner Rolfes in August 2023. If this council had been in place in Spring 2024 it could have informed the entire Year of the Rural Process and provided expanded representation for the entire agricultural sector.
- Strategy. Create a sustainable notification system to notify neighboring properties of existing agricultural activities and forest practices.
- NEW Strategy: Create a “Guide to Rural Living” similar to Thurston and Multnomah County's to educate residents in rural zones about co-existing with agricultural practices and to reduce conflicts over land uses in the rural areas.
- Policy. Support farm and agricultural businesses on designated agricultural lands while preserving rural character and natural resources.
 - COMMENT: We do not have designated agricultural lands in Kitsap – and “examining” and “exploring” the creation or designation of agricultural resource lands and created agricultural zoning has been in the Comprehensive Plan since 2016. This despite the recommendation Kitsap allow landowners to adopt “agricultural lands of local importance” designation for their parcels and providing protections for those parcels which align with activities and uses allowed in Agricultural Zones in other counties.
- NEW Strategy: Protect rural businesses and landowners against conflicts with the use of agricultural lands characterized under RCW 36.70A.170. Rural Business
- Goal. Foster rural businesses and business opportunities on rural commercial and rural industrial lands while balancing the protection of rural character.

- Policy. Allow or conditionally allow home-based cottage-type businesses and industries in the rural areas that do not negatively affect rural level of service or rural character.
- NEW Strategy: Expand the definition of agricultural accessory uses in the Agriculture Code to clarify what types of home-based businesses are allowed. Rural Environment Policy. On an ongoing basis, assess the effect of agricultural practices on non- point source pollution and groundwater impacts.
 - COMMENT: The new Washington State Department of Ecology regulations regarding non-point pollution have the potential to negatively impact agricultural activities.
- Strategy: Explore participation in the Voluntary Stewardship Program to support farmers and forest owners in protecting surface and groundwater while conserving arable land for food, fiber and forest production
- Policy. Coordinate with Kitsap Natural Resource Asset Management Project to develop watershed plans.
- NEW Strategy: Include farmland in the Kitsap Natural Resource Asset Management Project to quantify the contribution of working landscapes in watershed health and aquifer recharge.
- Goal. Support coexistence with beavers to enhance habitat, water quality & quantity, and ecosystem & community resilience, while managing and mitigating negative impacts on property, infrastructure, and working lands.
- Policy. Recognize the ecological benefits of beaver activity, including improved water storage, aquifer recharge, habitat creation, and climate resilience.
- Policy. Develop strategies to address and mitigate flooding, tree damage, and infrastructure conflicts caused by beaver activity.
- Policy. Encourage site-specific approaches that balance ecological benefits with protection of property and public safety.
- NEW Strategy: Partner with landowners, the Washington Department of Fish and Wildlife (WDFW), Kitsap Conservation District and other partners to implement an adaptive beaver management plan including strategies like installing pond levelers protecting trees and promoting living with beaver techniques.

KCAA comments regarding YOTR version 2.0 deliverables

1. Comments on description of the function of the Agriculture Advisory Council - Rural and Resource Lands Strategy 5.c.:

Recommendation:

The wording in the draft 2.0 YOTR document be changed to the following:

The Council would advise Commissioners and staff on key agricultural matters, including policy, land use, and economic opportunities, while serving as a collaborative forum for stakeholders to shape the long-term sustainability and resilience of the County's agricultural community. The initial term would be 2026–2027, with potential for extension based on demonstrated need and value. The following sections outline the Council's structure, goals, objectives, hot topics, membership, and operational details.

Explanation:

The current wording in Rural and Resource Lands Strategy 5.c. reads as follows:

“Form an Agriculture Advisory Council to inform the agricultural community about development of future policies and regulations and act as a resource to farmers regarding incentives and other assistance programs. “

This is precisely backwards of what the relationship should be. Agricultural community should be informing the BoCC about issues relating to agriculture and suggesting future policies and regulations for improving the status of agriculture in the County

2. Comments on proposed changes to the Agriculture Code

Recommendation:

If Kitsap County again picks up the topic of equestrian land uses for potential changes to the Agriculture Code, KCAA should be directly included in any effort to draft equestrian related land use regulations.

Explanation:

KCAA agrees with all the changes proposed in the version 2.0 draft Agriculture Code now that the proposed changes related to certain equestrian land uses have been dropped. However, KCAA would like to point out that It is not possible to separate equestrian related land uses from agricultural land uses without updating the main land use table in title 17, Zoning. As long as equestrian related land uses are tied to agriculture land uses, KCAA is a primary stakeholder for any land use discussions that would affect county codes addressing agriculture.

3. Comments on proposed Comprehensive Plan Rural and Resource Lands chapter

Recommendation:

KCAA recommends Kitsap County adopt Land Use Goal 5, Strategy 5e with the condition that this particular strategy has a time clock attached to it. Specifically, KCAA recommends this strategy be formally docketed through resolution to ensure it occurs in a timely manner following the adoption of this update.

Explanation:

KCAA believes that Kitsap County has not adequately addressed the topic of agriculture as an integral part of rural life, rural character, and rural resource-based businesses in Kitsap County's 2025 Year of the Rural (YOTR) update of the Rural and Resource Lands (RRL) chapter of its Comprehensive Plan.

4. Comments on establishing "Working Lands" as a recognized land use designation.

Recommendation:

Because any in-depth review of ARL criteria and designations has the potential to significantly alter how the county identifies and protects agricultural lands, KCAA suggests all references to "Working Lands" be removed from the current RRL chapter update. If it is found that the concept of "Working Lands" still has value in the future, "Working Lands" can be introduced as a more fully-developed concept than it is at the present time.

Explanation:

KCAA believes that Kitsap County is moving farther and farther away from the concepts established in RCW 36.70A regarding agricultural viability and is making it increasingly difficult to establish non-competing land use rules for designated zones where agriculture might occur.

Apparently, establishing an overlay for agricultural "working Lands" is an attempt by Kitsap County to afford some form of protection for lands historically used for agriculture, but does not affect the underlying zoning. There is so little information about how the working

lands overlay is supposed to function, it is essentially just a stalking horse place-holder for something that may or may not ever come to be.

5. General comments on Lack of Agriculture Resource Lands designation

In the 2025 YOTR RRL chapter update there continues to be a near total lack of regulatory protection afforded to the lands most suited to long-term agricultural uses in Kitsap County. In every other county in Washington State, each of those counties has identified and designated agricultural lands, and enacted some form of regulatory protection for at least some of the land-base in the county in order to protect agriculture as a viable natural resource-based industry.

Washington State's Growth Management Act recognizes three different land use classifications, which are Urban Lands, Rural Lands, and Resource Lands. Kitsap County's approach to the protection of resource lands and rural lands has been problematic from the start in that the county has been extremely reluctant to designate any land as resource lands, including Agricultural Resource Lands (ARL)

Kitsap County's Comprehensive Plans have been purposefully insistent about the county having determined that it does not contain agricultural lands of long-term commercial significance. As such, there has been, and currently is no land designated as ARL and therefore protected from competing non-agricultural land uses anywhere in Kitsap County.

Although Kitsap County states it has no ARL, three factors suggest that the existence of land that could and/or should have been designated as ARL was, and/or is present in Kitsap County.

- Kitsap County government cannot point to any documentation of any county process occurring since the inception of the GMA whereby a Finding of Fact established Kitsap County had no land matching Washington State's ARL designation criteria. Only a portion of the ARL designation process was completed by 1992. Kitsap County ARL designation criteria were adopted, but were highly exclusive. There is no evidence that shows this criteria was used to determine if, or how much land matched the local ARL designation criteria.
- Since at least as far back as the 2012 update of Kitsap County's Comprehensive Plan, sufficient doubt has been expressed in the Comprehensive Plan about the propriety of having no land designated as ARL. Each succeeding Comprehensive

Plan update has had a policy or strategy included to re-visit ARL designation for potential amendment of land use zoning.

- This Comprehensive Plan RRL chapter update continues the trend of calling for comparing actual conditions against ARL designation criteria. Rural and Resources Land Use Goal 5, strategy 5e. once again addresses this same issue. However, adopting a goal, policy or strategy to carry out an action cannot substitute for the statutory requirement to actually carry out the action that has been mandated, i.e., go through the full ARL designation process and show the outcome of that process.



Kitsap Conservation District

10322 Central Valley Rd NE ~ Poulsbo, WA 98370

360-204-5529 FAX 360-204-5519

Tax Id: 91-0851972

October 13, 2025

To: Kitsap Board of County Commissioners

Re: Kitsap Conservation District comments on the Year of the Rural Draft Chapter and proposed code revisions

Executive Summary

With regard to updates to the Kitsap County Code:

- Remove all references to Kitsap Conservation District in a regulatory role in the Equestrian Code (17.455.075)
- Exempt farm machinery from "Heavy Equipment" limitations on rural residential parcels (17.110.330)
- Expand approved uses of the permit exempt agricultural structures to include a vegetable wash/pack facility (17.455.080(a))
- Defer updates to the agricultural code until an Agricultural Advisory Council is established and seated.

With regard to the **Draft Rural Lands and Resources Chapter**, specifically the **Goals, Policies, and Strategies** in the agricultural and working landscapes section:

- Support agricultural and rural business viability using a more balanced approach to land use compatibility
- Form an Agricultural Advisory Council to advise the BOCC and policy makers on issues impacting agriculture and farming
- Include agriculture as an allowed use in Rural Commercial Zones.

Respectfully,

A handwritten signature in black ink, appearing to read "A. Allpress".

Albert Allpress

Chair, Kitsap Conservation District Board of Supervisors

Attachment: Letter



Kitsap Conservation District

10322 Central Valley Rd NE ~ Poulsbo, WA 98370

360-204-5529 FAX 360-204-5519

Tax Id: 91-0851972

October 13, 2025

To the Kitsap Board of County Commissioners

Land is the foundation of our food system and land stewards are the key to climate resilience. Local farms are essential to our daily lives. Supporting our agricultural producers, the equine sector and preserving farmland in Kitsap means healthy food for our children, thriving rural economies, and fertile, productive soils. The goals, policies and strategies in the Rural Chapter of the Comprehensive Plan provide a foundation for these outcomes.

Kitsap Conservation District is a non-regulatory organization working cooperatively with private landowners to help them responsibly and efficiently manage their working lands. We offer technical expertise to help individuals with site-specific plans to achieve land use and conservation goals; consultation on local regulatory requirements; and knowledge of funding sources and free or low-cost services. With that in mind, Kitsap Conservation District offers the following comments on proposed code changes and the Draft Chapter for the Year of the Rural released on September 2, 2025:

Kitsap County Zoning Code: Agricultural Code, Standards and Regulations

As a general recommendation, because code flows from and is supported by the Goals, Policies and Strategies in the Comprehensive Plan, and due to the short timeline from release of the proposed code changes until key decisions are to be made, we recommend all code revisions related to farming and equestrian facilities should be tabled until after an Agricultural Advisory Council is seated. The code revisions represent the type of guidance that an Agricultural Advisory Council are uniquely qualified to provide to the Board of Commissioners and the Department of Community Development.

With regard to specific proposed changes to code, we offer the following comments:

- 17.455.070 Livestock and Dairy Management
 - The purpose statement in this section was expanded to include the following language: "Operators shall implement Best Management Practices for runoff, dust control, and manure handling in a farm plan as **reviewed and approved** by the Kitsap Conservation District." The District is non-regulatory and the language as proposed places KCD in a regulatory role.
 - Recommended language: "Operators shall use Best Management Practices (BMPs) to address site-specific resource concerns as outlined in a farm plan. A farm plan should include a farm resource inventory, sufficient information and detail to document soil, water, air, personal, and animal resource concerns, recommendations for appropriate science-based Best Management Practices (BMPs) to address those concerns and note specific regulatory requirements including critical areas, private or public water supplies, and septic systems."

- 17.455.075 Equestrian Facilities
 - The proposed code states: “G. Farm plan approval shall be obtained from the Kitsap Conservation District.” As per our previous comment, the proposed language places KCD in a regulatory role. The District is a non-regulatory entity that does not enforce compliance or impose penalties and works cooperatively with private landowners to address natural resource concerns.
 - Additionally, this proposed code was released without input from the equine sector, thus adoption of this entire section should be deferred until after comprehensive stakeholder input into the development of applicable code can be conducted. The proposed code as written creates significant economic and regulatory barriers to compliance and is at odds with the stated goal in the rural chapter to support the economic viability of rural businesses.
 - The proposed code also includes unclear definitions and inconsistent requirements. For example: What constitutes a “paddock”? How does it differ from a pasture? How do facilities on smaller parcels (five acres) comply with a 200 ft set-back?
- 17.455.030 Definitions
 - Definitions for “Agricultural Activity”, “Agricultural use, primary” and “Farm” specifically exclude gardens for personal or community use. The USDA defines urban agriculture as:

“...the practice of cultivating, processing, and distributing agricultural products within urban and suburban areas, including initiatives like community gardens, rooftop farms, hydroponic and vertical farms.”

The USDA’s approach is broad, including various forms of urban farming, aiming to expand access to nutritious foods, create economic opportunities, and foster community engagement. This definition specifically includes both personal and community gardens as agricultural activities. Gardens frequently serve as a steppingstone to agricultural business and community gardens growing for food banks are managed as commercial farms. There seems to be no rationale for exclusion of these activities from agricultural code definitions and minimizes their contribution to a resilient food system.
- 17.110.330 Heavy equipment
 - Farm equipment is specifically *included* in this definition. The Agricultural Working Group recommended **exempting** farm equipment from the limitations and screening requirement in 17.415.020. Farmers frequently have several pieces of farm equipment including tractors, cultivation equipment, and livestock trailers. As all rural zones are single family zones and farms operate in those rural zones, the code as proposed would put most if not all farmers in violation of the code.
- 17.455.080 2(a) Agriculture Structure Requirements
 - Expand the allowable uses for agricultural buildings to include the post-harvest washing, packing, refrigeration and storage of farm produce. To comply with state and federal requirements for post-harvest handling of produce, diversified vegetable farmers need a wash and pack facility. This is an appropriate use for an agricultural building and is not a structure designed for occupancy as a residence or for activities other than defined in this section.

With regard to the **Draft Rural Lands and Resources Chapter**, specifically the **Goals, Policies, and Strategies** pertaining to agricultural and working landscapes, we offer the following:

- The Department of Community Development sought input from stakeholder groups. The Agricultural Working Group and other stakeholders offered specific goals, policies and strategies during the Year of the Rural process which would support farm and forestry activities, preservation of working lands, and the economic viability of rural businesses. The Draft Chapter fails to include many of these suggestions which support the economic viability of farms and rural businesses.
- Forming Advisory Councils for Agriculture and Forestry represents an important step in supporting the viability of these businesses. However, the primary role of these Councils should be to inform the Board of County Commissioners regarding issues of importance and concern for their respective constituents. The strategies as stated will “inform the agricultural / forestry communities about policies, regulations ... and resources.” This top-down information flow is at odds with the purposes of community advisory councils and fails to take advantage of their expertise.
- Land use compatibility in rural areas – specifically in Kitsap as all rural zones allow both residential uses and rural businesses – has emerged as a focus in this process and proposed code changes. As written, land use codes unduly burdens rural businesses including equestrian facilities, farms and other agricultural businesses by encumbering them with the responsibility for maintaining harmonious neighbor relationships. While Kitsap’s historic land use planning processes created a patchwork of development patterns in the rural zones, agriculture and forestry are allowed activities in all rural zones and the preferred activity in the Rural Wooded Zone. Educating residents about the permitted activities in the rural zones and promoting peaceful co-existence with adjacent rural businesses should be a priority. One role of the proposed Advisory Councils should be to provide guidance to DCD on how to best accomplish this.

Additionally, the District suggests expanding allowed uses under Rural Commercial zones to include agriculture. Currently agriculture is not a permitted use in the RCO zone which limits the ability of a Farm to Table Restaurant or food processor to grow and produce food on-site on a parcel zoned RCO.

We appreciate Kitsap County and the Department of Community Development’s receptiveness to previous public comments about the Rural Element in the 2024 Comprehensive Plan from the Kitsap Conservation District Board of Supervisors. It is our hope that the spirit of collaboration will continue in this process.

Respectfully,



Albert Allpress
Chair, Kitsap Conservation District Board of Supervisors

October 29, 2025

To: Christine Rolfes, Oran Root, Katie Walters

Dear Kitsap County Board of Commissioners,

The Environment and Land Use Committee of the Kingston Community Advisory Council met recently to review and discuss the 60% Draft of the Rural and Resource Lands Chapter. The Year of the Rural 2025 project will have a significant impact on all county residents and will leave a lasting impression on the character of Kitsap County.

Committee members raised a number of concerns with the 60% draft and the imminent closure of the public comment period. Concerns ranged widely from wanting more protections for rural and resource areas to concerns about housing affordability and a desire for more rural housing development flexibility.

The overarching concern is there has not been enough time for all the public to fully engage, discuss, research and provide material recommendations for the abundant zoning decisions about agricultural and other land uses.

Below are some of the points made. None should be taken as consensus opinions.

- The delay of the equestrian code into mid-year 2026 serves as an example of a larger issue. We are concerned that key stakeholder groups did not have input during the 12-month process. Although the YOTR committee has advised that members of the equestrian community were contacted, it's our understanding that none of the individuals they attempted to contact were identified nor the means that they used to do so disclosed.
- The 60% draft codes lack several important components, including definitions, which has raised concern with citizens and businesses. There is a blurred continuum between a home business, a cottage industry and commercial facility. This was the point of the equestrian controversy, but it extends beyond horses and really is a much bigger problem. Should farms comply with commercial building codes (setbacks, parking, fire area, sprinklers, exits, ADA bathrooms, energy codes) if there is public access? Are there special requirements for private activities on rural properties? When is a property a residence and when is it a farm? Agritourism generates noise. How the county interprets the requirements will have a big impact on the survival of small farms and businesses.
- We need to consider how housing growth and infrastructure needs interact at the borders between UGAs and rural areas - whether to address potential future expansion of UGAs/incorporation and also to recognize the county faces ongoing/increasing demands for services. These needs should be clustered near existing housing to both preserve existing rural character and to connect with existing infrastructure in UGAs and development. For example, road improvements, sidewalks, sewer/municipal water, etc.
- While rural performance-based development and rural cluster development are allowed, clarification is needed to ensure such clustering can be done sensitively (example – Wiseacres in Indianola area) and remains compatible with the rural character.
- The text indicates LAMIRD businesses are to be focused only on rural businesses, however, in North Kitsap these LAMIRDs are hubs for all manner of commercial activities, needed for rural and urban alike. The description of what businesses are allowed in LAMIRDs should be clarified.

- The YOTR draft needs a vision, definition of rural character and strategy addressing the housing and development pressures caused by being adjacent to Seattle and Tacoma, the significant commercial development throughout the county, growing outdoor tourism activities and the transit connections to jobs in Seattle. The plan needs a thoughtful analysis of what kind of agriculture/resource use is appropriate and viable in the County, and a description of the conditions, (lot sizes, infrastructure, regulatory environment, incentives) to achieve it. The [Kitsap County Farmland Preservation - Analysis and Recommendations, 2023](#), using 8 year old data showed the average farm size to be only 13 acres with less than 15% of farms making over \$10,000 in annual income. Are there other examples nationally where counties have been successful at achieving the goal of small farm preservation?
- Better Natural Resources mapping would allow for more thoughtful decisions on environmental protection as well as rural service and infrastructure needs.
- Page 21 Rural Service and Infrastructure needs revision. Policy (2) sanitary sewer should only be allowed after available septic options have failed – draft text seems to imply otherwise. Policy (4) transit should focus on rural needs as distinct from urban.
- On page 22, the definition of Environmental Wildlife Corridors should include land areas as well as wetlands and riparian areas to evaluate the location of corridors and habitat connectivity of all sizes of wildlife from amphibians to large mammals.

The 90% draft code will be rolled out on October 27th with the last date for public comment being November 10th. There is little time for stakeholders to digest the information and provide quality feedback. Local advisory groups (e.g., SCAC, KCAC, Port Orchard) are unable to meet and discuss the 90% draft code due to the timing of the expected release of the draft. This prevents an important opportunity to collect and digest community feedback regarding the 90% draft code.

Given the impactful nature of these codes, the citizens of Kitsap County need time for community discourse surrounding the proposed R&RL chapter and code changes.

We respectfully request your contemplation to provide extra time for additional public input before approving the final assessment of adopting YOTR codes similar as you have determined necessary for the equestrian facility code.

Thank you for your time and consideration regarding this Countywide impactful matter.

Respectfully,

KCAC Co-Chairs

Tim Davis and Glen Hutchinson



Mason-Kitsap County Farm Bureau®
October 9, 2025

Kitsap County Public Comments Form
Re: Kitsap County - 2025 Year of the Rural

On behalf of the Mason-Kitsap County Farm Bureau® members, we thank the Kitsap County Rural and Resource Lands Chapter in allotting us a seat within the Agricultural Steering Committee, including us in the 2025 Year of the Rural development process.

The Kitsap County Department of Community Development proceeding with the proposed Equine code into phase 2 of the engagement timeline is showing a substantial need for more information to propose such changes prior to moving forward into phase 3 of the engagement timeline. In phase 1, a public survey was released but requested little to no information specifically regarding the equestrian industry. Although, code revision proposals have been drafted and moved forward into phase 2, implementing effects on the equine industry to a great extent.

The agriculture, equestrian, and other industries help shape the economic viability throughout Kitsap County. While supporting rural Kitsap Communities by amending the equine portion of the code, we can support the economic viability of the entire County and all communities within.

To help bridge trust between the two communities, we ask that Kitsap County DCD would rescind the equestrian portion of the code and begin engaging in a review process with key stakeholders on a solution for all parties involved.

We thank you for your consideration and efforts in supporting our growing communities,

Sincerely, 
Mason-Kitsap County Farm Bureau®



November 9th, 2025

To: Kitsap Board of County Commissioners

Re: Year of the Rural Comment regarding Critical Area Ordinance Buffer denotation on county maps and, enforcement of those protective buffers.

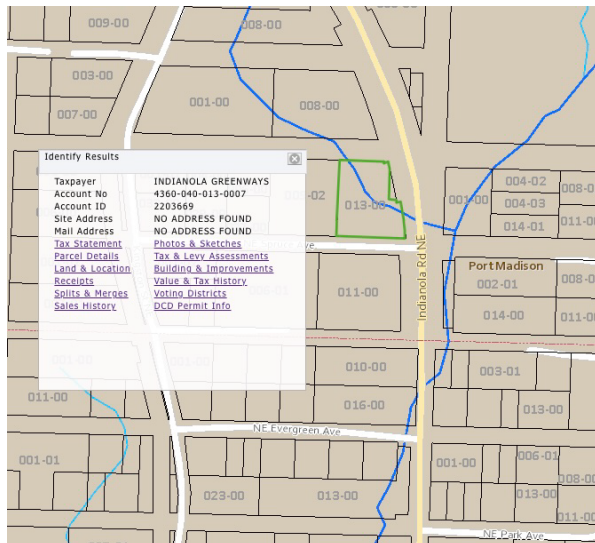
Dear Commissioners,

In looking over the three reclassification requests in the draft Year of the Rural document, something stands out to this citizen with an eye on Geographic Information Systems (GIS) and critical areas with their associated protective buffers.

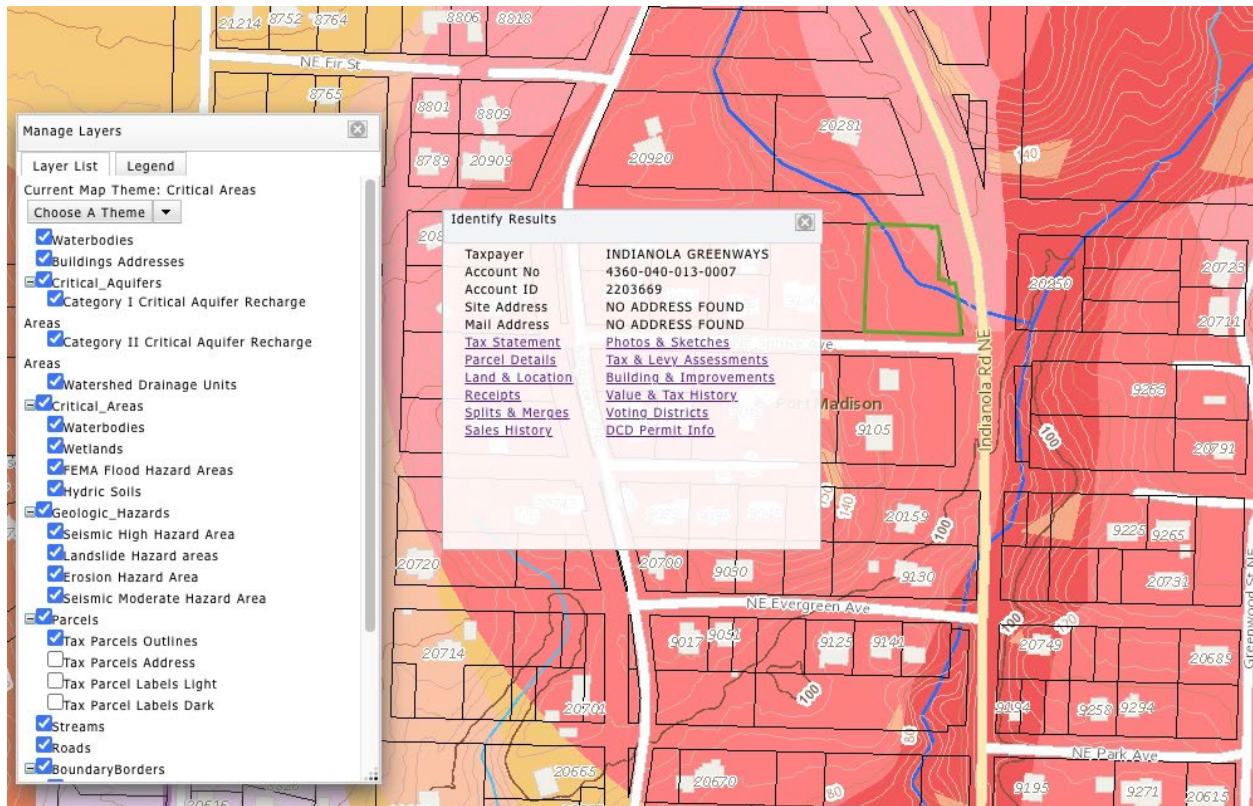
The need for clearly visible maps layers to show streams and wetland buffers

The Kitsap Parcel search website has a layer one can toggle on.

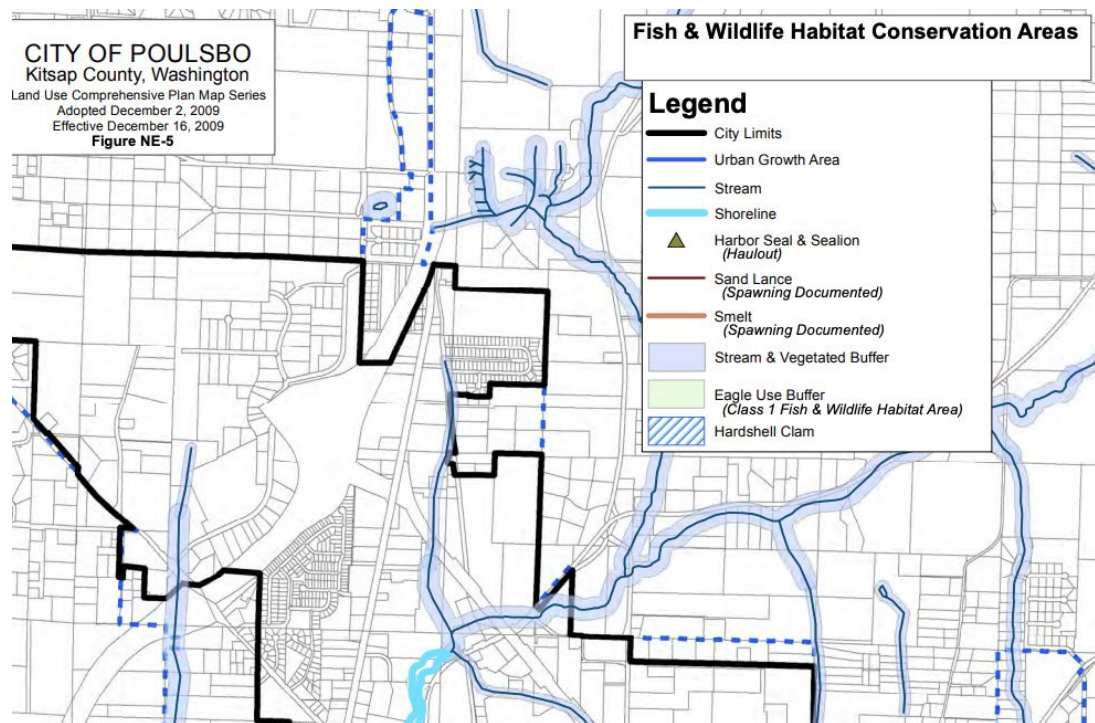
Here is a parcel in Indianola with the stream layer checkbox checked. There is no indication of the buffer (currently at 200 feet to either side of the center of the stream following the latest CAO update.)



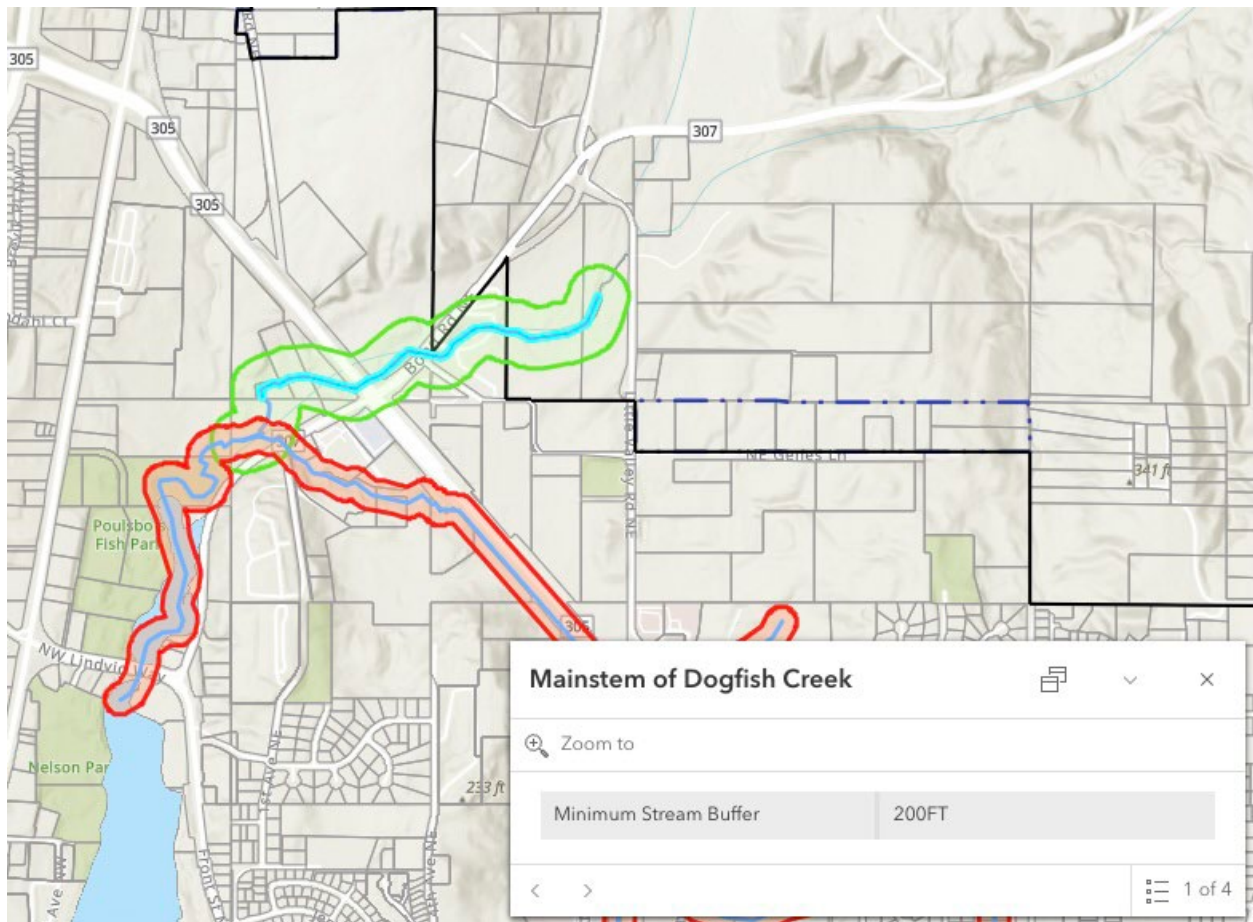
And here is the confusing view of the same parcel with all of the critical area options toggled on. This includes seismic hazard, geologically unstable land and more to where the various color meanings are unclear, and yet still no stream buffer is indicated or available.



In comparison, here is an older, 2009 City of Poulsbo Map with Fish and Wildlife Conservation areas clearly showing stream buffers.



And finally, here is the [2025 map that the City of Poulsbo has](#) indicating visually, and by clicking on the stream's line itself. In this screenshot, the fish bearing stream has been clicked and one of 4 available info displays shows, with this one indicating a 200-foot stream buffer which reflect best available science guidelines.



Most sizeable states, counties and municipalities provide online access to GIS data to the general public. With free or professional GIS software, the user can add the various layers of interest to their project. These layers include section, township and range; parcel polygons, streets, building polygons, city boundary polygons and so on. Most of these are available through the [Kitsap county GIS portal](#) EXCEPT stream data. The user can try all sorts of search terms and that search reveals nothing. One has to go elsewhere to get the data. Some stream data can be found at the state level. More detailed information on only some streams, can be found at the Wild Fish Conservancy website's interactive map section.

If Kitsap citizens were considering land to purchase and then build upon, they should have easy access to which lands are encumbered with one or more critical areas to be fairly warned that they cannot build without great restriction and expense to seek a variance through expensive consulting fees and remediation plans.

If we are to have any realistic expectation that the critical areas we strive to protect through best available science-based buffer widths, we'll need accurate spatial information on streams and wetlands as well as these buffer layers that the public can utilize to make informed choices.

Enforcement of those buffers or the variances granted to applicants

The Growth Management Act obligates counties to use best available science to both create buffer regulations to protect streams and wetlands and, expects that these regulations will be enforced when complaints are submitted to report possible violations that disregard buffers. Otherwise, the buffers are meaningless and merely words in a document.

The proactive protection of these critical areas would be the denial of building within a critical area buffer.

When a variance is allowed and restrictions are included in the approval process, then it is essential that there are enforcement mechanisms actively at work. Commonly included in these variances are requirements to improve the buffer in some way and to then submit to the county maintenance and monitoring reports for the duration required, which is usually five years. Merely accepting the reporting without any at least occasional verifying investigation, would render the process useless. More importantly, when complaints are submitted to the public regarding what appear to be infractions that degrade critical area buffers, those complaints need to be thoroughly investigated, and enforcement actions taken promptly if violations are found to have happened.

Summary

Please direct the appropriate staff to add stream and wetland layers to the Kitsap county GIS portal, and to then add critical area buffers to those layers to better inform and serve the public.

Lastly, please enforce the various critical area buffers both at the pre-permit stage but also once building permits have been improved to do all we can to protect these critical areas.

Thank you,

Doug Hayman, Indianola, WA



Futurewise

1201 3rd Ave Suite 2200, Seattle, Washington 98101

(206) 343-0681

futurewise.org

November 10, 2025

The Honorable Christine Rolfes
The Honorable Oran Root
The Honorable Katie Walters
Kitsap County Commissioner's Office
614 Division St. MS - 4
Port Orchard, Washington 98366

Dear Commissioners Rolfes, Root, and Walters:

Subject: Comments on the Year of the Rural New Draft Documents - 10/27/2025

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

Thank you for the opportunity to comment on the Year of the Rural New Draft Documents - 10/27/2025. Futurewise appreciates the hard work of staff, the Planning Commission, and the Board of Commissioners along with the residents that participated in the update. We generally support the rural updates, although we do have some comments to improve the updates below.

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

Our comments and recommendations are summarized below. We then provide more detailed comments on the update.

Summary

- We recommend that productive farmland be designated and protected as agricultural lands of long-term commercial significance. This is a more effective method of protecting working farms. If that is not possible, then the Agricultural Areas Overlay would be an improvement over current policies and provide additional protection for the valuable agricultural industry. Please see page 2 of this letter for more information.
- Futurewise supports Rural and Resource Lands Goal 9 and Policies 9.1 and 9.2 that recognize that equestrian businesses are important components of the rural economy, rural character, and rural lifestyle and call for supporting these uses. Please see page 3 of this letter for more information.

- Rural and Resource Lands Policy 10.2 omits the requirement that sewers must be financially supportable at rural densities and do not permit urban development. We recommend that Policy 10.2 be revised to include these important requirements. Please see page 3 of this letter for more information.
- Rural and Resource Lands Strategy 10.b. cannot call for siting urban uses such as large-scale data centers in the rural area. Please see page 4 of this letter for more information.
- Breweries, wineries, and distilleries, use large quantities of water. To protect ground water and instream flows, wineries, breweries, cideries, and distilleries should only be allowed where they can be served by Group A water systems with sufficient water rights to serve the use. Please see page 5 of this letter for more information.

More Detailed Comments.

Comments on the Draft Rural and Resource Lands Chapter 2.0

The Agricultural Areas Overlay on page 17.

Farming is an up and coming industry in Kitsap County. The 2022 Census of Agriculture documents that the acres of land in farms in Kitsap County increased from 9,391 acres in 2017 to 9,539 acres in 2022.¹ Total income from farm-related sources in Kitsap County increased from \$3,161,000 in 2017 to \$4,791,000 in 2022.² Average per farm income increased from \$23,944 in 2017 to \$53,831 in 2022.³

We recommend that this productive farmland be designated and protected as agricultural lands of long-term commercial significance. This is a more effective

¹ United States Department of Agriculture National Agricultural Statistics Service, *2022 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-22-A-47 Chapter 2. County Data Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2022 and 2017* p. 286 (Issued Feb. 2024) last accessed on Nov. 10, 2025, at: https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1,_Chapter_2_County_Level/Washington/ and at the link on the last page of this letter with the filename: "wav1.pdf."

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

³ *Id.*

method of protecting working farms than other approaches.⁴ If that is not possible, then the Agricultural Areas Overlay would be an improvement over current policies and provide additional protection for this valuable industry.

Futurewise supports the Rural and Resource Lands Goal 9 and Policies 9.1 and 9.2 on page 22.

Futurewise supports Rural and Resource Lands Goal 9 and Policies 9.1 and 9.2 that recognize that equestrian businesses are important components of the rural economy, rural character, and rural lifestyle and calls for supporting these uses. We agree that these uses are appropriate rural uses and support the economy and rural character.

Clarify Rural and Resource Lands Policy 10.2 so it complies with the Growth Management Act. Please see page 22.

RCW 36.70A.110(4) provides in part that: “In general, it is not appropriate that urban governmental services be extended to or expanded in rural areas except in those limited circumstances shown to be necessary to protect basic public health and safety and the environment and when such services are financially supportable at rural densities and do not permit urban development and as authorized in RCW 36.70A.830.”⁵ Rural and Resource Lands Policy 10.2 omits the requirement that sewers must be financially supportable at rural densities and do not permit urban development. We recommend that Policy 10.2 be revised to read as follows with our additions double underlined.

- Rural and Resource Lands Policy 10.2. Prohibit extension of sanitary sewer service in the rural area except in those limited circumstances shown to be necessary to protect basic public health and safety and the environment and when such services are financially supportable at rural densities and do not permit urban development.

⁴ Arthur C. Nelson, *Preserving Prime Farmland in the Face of Urbanization: Lessons from Oregon* 58 JOURNAL of the AMERICAN PLANNING ASSOCIATION 467, p. 468 (1992) at the link on the last page of this letter with the filename: “Preserving Prime Farmland in the Face of Urbanization Lessons from Oregon JAPA.pdf.” The Journal of the American Planning Association is peer reviewed. Journal of the American Planning Association Instructions for authors p. 1 of 8 at the link on the last page of this letter with the filename: “JAPA Instructions for Authors June 2017.pdf.”

⁵ See also *Thurston Cnty. v. Cooper Point Association*, 108 Wn. App. 429, 434, 31 P.3d 28, 33 – 34 (2001), affirmed *Thurston Cnty. v. Cooper Point Association*, 148 Wn. 2d 1, 57 P.3d 1156 (2002).

Rural and Resource Lands Strategy 10.b. cannot call for siting urban uses in the rural area. See page 22.

Data centers are large urban uses.⁶ “The average full-scale data center is 100,000 square feet in size ...”⁷ These data centers typically occupy large sites as can be seen in the aerial image of the Dell Data Center in Quincy from the State of Washington Department of Ecology website and the shaded locations of the data centers.⁸ Urban growth is prohibited outside urban growth areas.⁹ RCW 36.70A.030(48) provides that “[u]rban growth’ refers to growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands designated pursuant to RCW 36.70A.170.” As can be seen in the aerial image of the Dell Data Center in Quincy and the locations in Quincy, these uses occupy too much land and are too large to allow their sites to be farmed, to grow forest, to be protected, or be mined.¹⁰ So data centers are urban growth and cannot be allowed outside urban growth areas. Consequently, Rural and Resource Lands Strategy 10.b. cannot call for siting data centers let alone large scale data centers in the rural area. We recommend that Rural and Resource Lands Strategy 10.b. be revised as shown below with our deletions double struck through.

⁶ Constance Carr, Desmond Bast, Karinne Madron & Ahmad Mafaz Syrus, *Mapping the clouds: the matter of data centers*, 18:1 JOURNAL OF MAPS 106, 108 – 111, DOI: 10.1080/17445647.2022.2088304 last accessed on Nov. 7, 2025, at:

<https://www.tandfonline.com/doi/pdf/10.1080/17445647.2022.2088304> and at the link on the last page of this letter with the filename: “Mapping the clouds the matter of data centers.pdf.” The Journal of Maps is peer-reviewed. About this journal webpage last accessed on Nov. 7, 2025, at: <https://www.tandfonline.com/journals/tjom20/about-this-journal#aims-and-scope> and at the link on the last page of this letter with filename: “Learn about Journal of Maps.pdf.”

⁷ Dgtl Infra, *Cities and regions with the highest concentration of data centers* REAL ASSETS ADVISER webpage p. *2 (February 1, 2023; Vol. 10, Number 2) last accessed on Nov. 7, 2025, at: [https://irei.com/publications/article/cities-regions-highest-concentration-data-centers/#:~:text=How%20many%20data%20centers%20are,than%20\\$2%20billion%20investment%20spanning](https://irei.com/publications/article/cities-regions-highest-concentration-data-centers/#:~:text=How%20many%20data%20centers%20are,than%20$2%20billion%20investment%20spanning). Enclosed at the link with the filename: “Cities and regions with the highest con...ters _ Institutional Real Estate, Inc.pdf.”

⁸ State of Washington Department of Ecology, *Diesel pollution from data centers* webpage last accessed on Nov. 7, 2025, at: <https://ecology.wa.gov/air-climate/air-quality/data-centers> and at the link on the last page of this letter with the filename: Data centers - Washington State Department of Ecology.

⁹ RCW 36.70A.110(1)

¹⁰ State of Washington Department of Ecology, *Diesel pollution from data centers* webpage. See also the images of data centers in Mary Zhang, *United States Data Centers: Top 10 Locations in the USA* pp. *3 – 14 (April 11, 2024) last accessed on Nov. 7, 2025, at: <https://dgtlinfra.com/united-states-data-centers/> and at the link on the last page of this letter with the filename: “United States Data Centers_ Top 10 Locations in the USA - Dgtl Infra.pdf.”

- Rural and Resource Lands Strategy 10.b. Develop comprehensive plan goals, policies and strategies, and associated development regulations, to address the siting, impacts, and standards for development of battery energy storage systems (BESS) ~~and large scale data centers for artificial intelligence and cloud computing storage.~~

Comments on Kitsap County Zoning Code Agriculture Code, Standards, and Regulations 09/02/2025; Updated 10/24/2025: 17.455.060 Agricultural, accessory use or agritourism.

Breweries, wineries, and distilleries, use large quantities of water. Breweries on average use 3.49 liters of water for each liter of beer produced.¹¹ Wineries on average use 3.92 liters of water for each liter of wine produced.¹² Distilleries on average use 36.81 liters of water for each liter of liquor produced.¹³ All of these facilities use 1.93 liters of water for each liter bottled.¹⁴

Kitsap County is short on water. “Eighty percent (80%) of the Kitsap County population uses groundwater that is pumped from wells.”¹⁵ “As the population grows, so does the demand for groundwater. The quantity of usable groundwater is limited.”¹⁶ As water use increases, water levels decline, groundwater discharges to streams decrease, and seawater intrudes into groundwater.¹⁷ “Coho salmon, steelhead and cutthroat trout are the most vulnerable to low stream flows (and warm waters) because they rear in freshwater in the summer when low flow/high temperature conditions can constrain habitat and stress fish in some streams.”¹⁸

The reduced availability of surface water can have a negative impact on all stages of the salmonid life cycle. Water quality (e.g. temperature, flows) is affected by decreased inputs from

¹¹ Samantha Gordon, *Water Bills, Baselineing, and Benchmarking* p. *8 (April 23, 2020) last accessed on Nov. 10, 2025, at: <https://files.nc.gov/ncdeq/KPPC%20SSBI%20Water%20Webinar%2004232020.pdf> and at the link on the last page of this letter with the filename: “KPPC SSBI Water Webinar 04232020.pdf.”

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *2020 State of Our Watersheds: A Report by the Treaty Tribes in Western Washington* p. 321 last accessed on Nov. 10, 2025, at: <https://nwifc.org/publications/state-of-our-watersheds/> and at the link on the last page of this letter with the filename: “state-of-our-watersheds-sow-2020-final-web.pdf.”

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ *Id.*

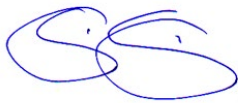
groundwater. Lessened groundwater input concentrates pollutants, increases temperature, and diminish[es] dissolved oxygen. This is detrimental to salmonid migration, spawning and rearing.¹⁹

The *East Kitsap Demographically Independent Population (DIP) Steelhead Recovery Plan* “identifies various strategies to address water withdrawals and low streamflows for steelhead and their habitat” including “[e]nforce and improve land-use regulations that protect hydrology, including aquifer recharge areas”²⁰

To protect ground water and instream flows, wineries, breweries, cideries, and distilleries should only be allowed where they can be served by Group A water systems with sufficient water rights to serve the use. Group A water systems are more likely to have the needed water rights and the management necessary to protect the water quality.

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

Very Truly Yours,



Tim Trohimovich
Director of Planning and Law

Enclosures at this link:

<https://futurewiseorg.sharepoint.com/:f:/g/EtVQiaTPIvhEu8eK7LNhhdcB-qRLNH3LN1LktSsPw6auHQ?e=8zi7gH>

¹⁹ *Id.* p. 40.

²⁰ *Id.* pp. 321 – 22.



THE SUQUAMISH TRIBE

NATURAL RESOURCES DEPARTMENT
PO Box 498 Suquamish, WA 98392-0498

10 November 2025

Heather Cleveland
Department of Community Development
Planning and Environmental Programs
614 Division Street, MS-36
Port Orchard, WA 98366

SUBJECT: Draft Rural Resource Lands Chapter of the Comprehensive Plan, proposed updates to rural development codes, and site-specific reclassification requests

Dear Ms. Cleveland

The Natural Resource Department of Suquamish Indian Tribe of the Port Madison Reservation appreciates the opportunity to review and comment on draft Rural Resource Lands Chapter of the Comprehensive Plan, proposed updates to rural development codes, and site-specific reclassification requests associated with Kitsap County's "*Year of the Rural*". Most of the area covered by these proposed updates lies within the Suquamish Tribe's aboriginal homeland and includes treaty reserved fishing areas and hunting and gathering areas. 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 territory.

Below are preliminary Suquamish comments on the Year of the Rural update to the Kitsap County Comprehensive Plan. The Year of the Rural update is narrowly focused on GMA requirements to the detriment of a more holistic view of the affected environment, resulting in claims of protection or guidance that are, in fact, not reflected by the information the County collects or analyzes. A case in point is groundwater recharges and CARAs, which is addressed in specific comments.

As noted in "Chapter #: Rural and Resource Lands Element", updated October 24, 2025, the

"The Rural and Resource Lands chapter originally stood independently following the "Year of the Rural" initiative in the 2010 Comprehensive Plan. In the 2016 Comprehensive Plan, this chapter was blended into the Land Use chapter and remained so during the 2024 update. Through a renewed effort focused on research, analysis, and community outreach, the chapter will once again stand independently, providing dedicated guidance for the management and preservation of rural and resource lands into the future."

Given the intent "*the chapter will once again stand independently, providing dedicated guidance for the management and preservation of rural and resource lands into the future*" the County should reconsider some of the existing wording brought forward. To such an end, the comments in this letter address both imported language from the existing Comp Plan as well as new language.

Additionally, the County should avoid wording that can inadvertently restrict some people from retaining large tracts of land in relatively undeveloped condition. For example, some landowners may no longer wish to engage in agricultural or equestrian activities, but are willing to rent or lease the land to those that are. The County should avoid creating wording that inadvertently discriminates against renters or tenants, such as reference to property or land owner. An example of that was found in an earlier draft of the Horse Facilities Draft Code (now withdrawn)

which used the wording (bold emphasis added): “*Stabling, riding and pasture accommodations for use solely by a **property owner’s** own horses shall be considered an accessory use.*” If the property or landowner no longer desires to engage in such agricultural or equestrian activities and is unable to find a renter or tenant due to code not recognizing tenants, then there is greater probably the land will be converted to higher intensity uses reducing the mosaic of lands contributing to the rural character.

Additionally, the proposed wording (addressed in more detail in specific comments) fails to ensure that new residents are aware of the extent to which noise, light, traffic, *etc.* may be perceived or manifested far from the source of forestry and agricultural activities. This can lead to frequent complaints to County Code enforcement and might influence some owners to cease the activity and convert the land to more intensive uses.

Furthermore, the County must ensure that emerging small scale agricultural activities are not curtailed by regulation and routinely conduct reviews to determine if County Code is preventing new or emergent agricultural products or activities from developing.

The Tribe is concerned that the three proposed reclassifications might not be supported by the staff reports. KCC 17.570.020 deals with nonconforming uses of land. That section has several references to two (2) years or twenty-four months (24) as key periods of non-use after which the non-conforming use is no longer authorized. Specifically, KCC 17.570.020 contains the following wording:

“A. Continuation of Nonconforming Use. Any nonconforming use of a structure which was lawfully established and which has been lawfully, actively and continually maintained, may be continued subject to the limitations of this section. In all proceedings other than criminal, the owner, occupant or user shall have the burden to show that the use or structure was lawfully established.”

However, in the staff reports for the proposed reclassifications, there is scant information to show the County has researched if the non-conforming use had lapsed in the past.

Finally, it is time for the County to start addressing the legacy of non-conforming lots and not just evaluate legacy lots to identify opportunities for aggregation, shared use, or other mechanisms to reduce the impact the development of such lots has on the rural character and natural resources.

Specific comments on the various proposed documents follow.

Page Number	Document Wording (red color follows that from source document and indicates proposed amendments to current documents) Bold emphasis added	Suquamish Comment
Kitsap County Comprehensive Plan 2024 Chapter 1 / Land Use Element		
21	the protection of rural areas and natural resource lands, including preservation of places of natural beauty, working agriculture	The County proposes deleting the word “ <i>enhance</i> ” from this Vision section of the document, but later on

	and timber lands, community identity, and rural character to retain and enhance unique historical character, appearance, and function, including recreation and natural resource activities, such as forestry, agriculture, and mining, that contribute to the rural character and economy.	the same page the document retains the word in the following sentence in the Intent: <i>“The goals and policies also recognize that rural areas and communities have unique historical characteristics, appearances, and functions that should be retained and enhanced.”</i> For consistency between Vision and Intent, the Vision section should retain wording about “<i>enhance</i>”, otherwise, one reading could be that the County’s envisions there will be no enhancement of the natural character of rural areas. This is important as the RRL Element as noted by the following sentence of page 1, <i>“Wildlife habitats, critical areas, and healthy ecosystems are protected to ensure resilience and coexistence with nature”</i> is part of the rural character.
74	For this reason, although agricultural activity occurs in Kitsap County, the County’s agricultural land lacks the capacity for long-term commercial significance. Therefore, Kitsap County does not designate any agricultural resource lands.	The County should consider if County policies could inadvertently preclude the establishment of agriculture of long-term commercial significance.
Chapter #: Rural and Resource Lands Element September 2, 2025 Draft; Updated October 24, 2025		
	VISION AND CHARACTER	
1	Kitsap County’s vision is the protection of rural areas and natural resource lands, including preservation of places of natural beauty, working agriculture and timber lands, community identity, and rural character.	See comments to page 21 Land Use Chapter re the word “<i>enhance</i>”. Additionally, due to the existing pattern of habitat degradation, even in the rural areas, habitat enhancement is needed.

1	Growth is carefully managed to prevent sprawl and urban encroachment, with development patterns and services aligned to rural needs.	Though not included, at this time in the update, the previously proposed Kitsap United project is a project that cannot be considered to align with rural needs.
2	Safeguard natural surface water flows, groundwater recharge, and discharge areas, ensuring clean water systems and resilient hydrology.	As communicated earlier to the County during the development of the existing Comprehensive Plan and revisions to the CAO, the County's CAO unable to safeguard natural surface water flows or groundwater recharge as the existing CAO typically does not address groundwater recharge issues except for water quality of aquifers for potable use. Indeed, the information required by the applicable special reports is restricted to CARAs and their recharge. There is no requirement to look at alterations of stream flow or groundwater recharge in non-CARA areas. The Tribes comments on these issues as presented in response to the Comp Plan DEIS (<i>"Comments on 2024 Comprehensive Plan Update Draft Environmental Impact Statement Kitsap County"</i> dated 26 February 2024) and the CAO revisions (<i>(Draft Kitsap County Critical Areas Ordinance Update"</i>) dated 26 April 2024 are incorporated by reference. The County Planning Commission and Board of Commissioners must be made aware the CAO does not support the Comp Plans intent or vision for surface flows or groundwater recharge as the CAO is worded to protect CARAs and not non-CARA groundwater or interflow.
BACKGROUND OF CHAPTER		

5	TRIBAL LANDS TREATY RIGHTS Kitsap County acknowledges tribal lands as a type of land – recognizing and supporting tribal cultures and meaningful tribal consultation in rural and resource lands policy decisions and protection of cultural resources.	There is no acknowledgment that in addition to the tribal reservation lands, that the all of Kitsap County is within the Usual & Accustomed Area of one or more Tribes and that these Tribe’s each have their own reserved treaty rights to many natural resources. The County has an obligation to protect treaty reserved resources that goes beyond cultural resources. Understanding the various types of tribal lands are key to comprehending what the County means on page 10.
5	This included two rural surveys—Survey 1.0 in February/March and Survey 2.0 in June/July—designed to capture community priorities and concerns. In addition, staff engaged stakeholders through presentations, interviews, and meetings with a broad range of groups, including the Agriculture Working Group, Kitsap County Child Care Task Force, Kingston Rotary, Tribal representatives, Kitsap Rural Business Coalition, Great Peninsula Conservancy, Washington Department of Natural Resources and a gravel pit owner, and County staff from Parks, Emergency Management, and Department of Community Development divisions (Current Planning, Building & Fire Safety, Environmental Programs).	As noted earlier, there are several tribes with Usual & Accustomed Areas within Kitsap County. No tribe can speak for another tribe. If the County retains this wording, the specific tribes should be mentioned, if engagement was with staff or leadership, and the nature of the meetings, such as an introduction to the Year of the Rural or detailed conversations.
	KEY TERMS (EXISTING DEFINITIONS, POTENTIALLY TO BE REVISED)	
6	AGRICULTURE USES Uses and practices, primarily commercial in nature, which are in support of agricultural activities, agricultural products, agricultural equipment and facilities, and agricultural land, as defined in WAC 173-26-020(3). This excludes activities typically associated with single-family residences,	Is there a definition of “<i>occur at smaller scales</i>”? If not, then it will be difficult to ascertain what is an agriculture area versus a location where agriculture occurs but at too large of a scale to be considered an agricultural area. See this wording from page 17

	such as gardening activities primarily for on-site consumption. AGRICULTURE AREA Areas where farming and local food production occur at smaller scales.	<i>“The Agricultural Areas Overlay is being proposed for consideration in the future, in accordance with RCW 36.70A.170. This overlay applies to lands that support existing agricultural activities and are not already characterized by urban growth. While Kitsap County has determined that it does not contain Agricultural Lands of Long-Term Commercial Significance as defined by RCW 36.70A.030, this overlay provides a tool to recognize and protect the areas where farming and local food production occur at smaller scales.</i> <i>The Agricultural Areas Overlay works in conjunction with underlying rural zones, adding an additional layer of protection and policy guidance to maintain agricultural uses, encourage local food systems, and preserve rural character.”</i>
6	AGRICULTURAL ACTIVITIES The normal actions associated with the production of crops such as plowing, cultivating, minor drainage, and harvesting; and/or raising or keeping of livestock (as defined in Title 17, Zoning), including operation and maintenance, and repair of farm and stock ponds, drainage ditches, irrigation systems, and normal operation, maintenance, and repair of existing serviceable agricultural structures, facilities, or improved areas.	Many purportedly agricultural drainage ditches are the remnants of streams and wetlands and are to be considered streams or wetlands for regulatory purposes. Additionally, an artificial drainage ditch can be considered a stream if fish use it. Maintenance activities in these watercourses will typically require a HPA, and sometimes a CWA Section 404 permit.
6	FARM Any size parcel or parcels owned or leased by the same person or entity, wherein a majority of the net developable acreage is managed for primary agriculture uses. Multiple contiguous parcels in the same ownership or leased may be considered one parcel for the purposes of livestock management calculations. Multiple	The County has failed to address the issue of legacy, non-conforming lots. And the County allows for multiple contiguous parcels in the same ownership to be considered as separate parcels for development purposes enabling the applicant to seek reasonable use exemptions or

	noncontiguous parcels under the same ownership or leased may be considered a single farm.	waivers from CAO requirements to build upon each parcel, rather than requiring the parcels to be aggregated to reduce intrusions into critical area or its buffer. The County needs a consistent approach to this issue. See comments to page 18.
	RURAL LAND USE DESIGNATIONS AND ZONING	
9	WILDLIFE CORRIDORS These corridors are generally strips of natural habitat that connect two or more large habitat areas, enabling wildlife to travel between ecosystems for feeding, breeding, and migration. These corridors can take various forms, including rivers, forests, and human-made structures like overpasses and underpasses designed to facilitate safe animal movement across roads.	This definition assumes that wildlife corridors are continuous strips of natural habitat connecting larger habitats. However, small, isolated patches – not encompassed within a larger strip - located between larger habitat areas can allow animals, particularly small mammals and amphibians to move between the larger habitat patches. However, County Code does not recognize this important function. The County should give more consideration to the corridor function of small habitat patches.
10	Tribal Lands Insert – to acknowledge the existence in Kitsap County and impact on rural and resource lands and collaboration but no change in authority in land use regulation. Military Installations Insert – to acknowledge the existence in Kitsap County and collaboration but no change in authority in land use regulation.	See comments to page 5, Tribal Lands as to what might be tribal lands. The wording for Tribal Lands is unclear as to the intent. The wording for military installations differs significantly from those of Tribal Lands, but military installations, facilities, and infrastructures are present in the rural areas.
	LIMITED AREAS OF MORE INTENSIVE RURAL DEVELOPMENT (LAMIRDs)	
14	Type 3: Employment Centers	The County should not presume that intensifying development or use at existing employment centers will not have adverse impacts upon

		natural resources nor consider that existing outdated environmental documentation for such sites accurately describes the current on the ground environment. For example, due to errors with the DNR hydro layer, boots on the ground surveys are finding that more and more Type Ns or Np streams should being retyped as Type F, as well as finding Type Ns or Np streams that are not mapped. Ecology Road is located in or near the headwaters of three (3) salmonid bearing streams Twelve Trees is located in the headwaters of a salmonid bearing stream.
	RESOURCE LANDS AND WORKING LAND	
16	Residents located within or adjacent to the Forest Resource Lands zone shall recognize that they can be subject to normal and accepted forestry practices on parcels located within this zone.	Adjacent is an undefined term. The noise, dust, vehicle traffic, <i>etc.</i> generated by forestry activities does not stop at the boundaries of adjacent parcels but can cross many parcels until dissipated. The code wording must recognized this.
17	Forestry is defined as the use of land for producing and caring for a forest, including the harvesting of timber.	This definition could overlook the use of other forest products, such as bark, evergreen brush/ferns, herbs, mushrooms, <i>etc.</i>
	RURAL AND RESOURCES LANDS: GOALS, POLICIES, AND STRATEGIES	
	Rural Development	
17	Rural and Resource Lands Policy 1.3. Limit the rural area to low residential densities that can be sustained by minimal infrastructure improvements , cause minimal environmental degradation, and that will not cumulatively create the future necessity or expectation of urban levels of service.	The word “<i>minimal</i>” is subjective. To provide clearer guidance, suggest the wording be amended to read: “...low residential densities that can be sustained by <i>rural levels of infrastructure</i> minimal infrastructure improvements, cause minimal...”

		Also, suggest the wording be amended to read: “and that will not <i>individually or</i> cumulatively create the future necessity or expectation of urban levels of service.” Urban level of services is a vague term, it can mean hard infrastructure such as sewers or water systems, or it could be soft such as plowing roads to remove snow. Extending soft services such as plowing roads of snow to rural areas creates the expectation of more urban level services. The Kitsap United proposal is the type of proposal that by itself could create the expectation or need for urban levels of service.
18	Rural and Resource Lands Policy 1.4. Permit residential uses in rural areas in a variety of rural lot sizes consistent with the designated land use and zoning of the surrounding area. Clustering may be allowed where appropriate.	Depending upon visibility, clustering can diminish the rural look. Additionally, the special reports as might be required by the CAO, and in many cases a special report is not required, currently fail to address key issues such as changes in groundwater recharge, interflow patterns, or upwelling into streams or wetlands that might be altered by clustering. As stated in many previous comment letters by the Tribe, rural clusters can easily cross the line and turn into urban level densities. Any rural cluster proposal requested must contain detailed information on how the project complies with the GMA and previous hearings board decisions regarding rural character and sprawl.
18	Rural and Resource Lands Policy 1.7. Evaluate legacy (pre-GMA) lots to identify opportunities for aggregation, shared use, or other mechanisms that support viable rural	Development of legacy lots in the absence of aggregation where possible can create urban like densities. The County has failed to

	and agricultural uses, taking into account the challenges and constraints these lots pose for conventional development, while maintaining rural character and minimizing impacts.	address the issue of legacy, non-conforming lots. And the County allows for multiple contiguous parcels in the same ownership to be considered as separate parcels for development purposes and seek reasonable use exemptions or waivers from CAO requirements to build upon each parcel, rather than requiring the parcels to be aggregated to reduce intrusions into critical area or its buffer. However, if the adjacent parcels were aggregated no intrusion would be needed into the CAO or its buffer. However, the County also allows (page 6): “Multiple contiguous parcels in the same ownership or leased may be considered one parcel for the purposes of livestock management calculations. The County needs a consistent approach to this issue and in line with the wording above should consider multiple contiguous parcels in the same ownership or leased as one parcel when a development application is received. As noted in the County Staff report for the proposed reclassifications, <i>“Consolidating parcels would increase the usable area by removing individual lot line setbacks, minimize fragmented development, and support more efficient use of infrastructure consistent with rural service levels.”</i>
18	Rural and Resource Lands Strategy 1.c. Prepare a Rural Lands Analysis (RLA) which evaluates current status and future projections for the rural area regarding land use and development trends, land capacity,	This Analyses should consider current and future projects for impacts on groundwater recharge potential, not just in CARAs, but in all areas and based the analysis upon

	compatibility of neighboring land uses, availability and adequacy of rural infrastructure, urban/rural boundaries, locations of wildlife corridors and habitat connectivity, transfers and purchases of development rights, and other rural issues. The RLA should be updated regularly to inform periodic updates to the BLR and Comprehensive Plan.	maximum allowed density and projected increases in in stormwater runoff; and projected loss of area of riparian area due to variances and reasonable use exceptions. Additionally, the phrase “<i>updated regularly</i>” is undefined. The frequency of updates, such as every five years, should be specified
18	Rural and Resource Lands Strategy 1.d. Continuously monitor development in the rural area regarding clustering, legacy lots, density transfer, design guidelines, conservation easements and other innovative land use techniques to ensure they are working as intended.	To ensure that these techniques are actually working, the County must include documenting the area of critical area and/or their buffers lost due to reasonable use exceptions and variances.
	Resource Lands and Working Lands	
19	Rural and Resource Lands Policy 3.1. Account for the continued use of properties managed for timber production and compatibility of these properties with surrounding lands.	The wording here puts the onus on the owners and or operators of properties managed for timber production to be compatible for surrounding lands. The burden should be on the County informing residents that resource lands generate noise, light, glare, traffic, dust, <i>etc.</i> often a considerable distance from the site of activity.
20	Rural and Resource Lands Strategy 5.a. Develop and adopt policies with appropriate local, county, and state agencies to promote viable coordinated water resources for greater accessibility to water rights for agriculture usage.	The intent of this wording is understood; however, as written it promotes agricultural uses of water over that required by streams to support aquatic life.
21	Rural and Resource Lands Strategy 5.d. Create a sustainable notification system to notify neighboring properties of existing agricultural activities and forest practices.	Neighboring is an undefined term. The noise, dust, vehicle traffic, <i>etc.</i> generated by agricultural and forestry activities does not stop at the boundaries of neighboring parcels but can cross many parcels until dissipated. The County must recognized this.

22	Rural and Resource Lands Goal 9. Develop regulations that support equine activities as part of the rural economy and lifestyle while maintaining rural character and compatibility with neighbors.	Equine activities maintain considerable open space on sites that would otherwise be subdivided . The County must ensure that any regulations do not make the County less hospitable to equine activities or timber harvest.
22	Rural and Resource Lands Policy 10.1. When considering public spending for facilities and services within the rural area, prioritize the maintenance of existing facilities and services that protect public health and safety and only upgrade facilities and services to provide rural service levels without creating capacity for urban growth .	This policy should also consider that though it is possible for an upgrade to not create capacity for urban growth, that upgrade might inadvertently focus development into unintended areas. Additionally, these facilities should be related to rural activities, such as passive recreation/county parks.
22	Rural and Resource Lands Policy 11.3 Maintain Type I LAMIRDs at residential densities that can be sustained by minimal infrastructure improvements , minimize environmental degradation, and that will not cumulatively create the future necessity or expectation of public facilities and utilities at urban levels of service.	The word “ <i>minimal</i> ” is subjective. To provide clearer guidance, suggest the wording be amended to read: “...low residential densities that can be sustained by <i>rural levels of infrastructure</i> minimal infrastructure improvements , minimize environmental degradation, and ...” Also, suggest the wording be amend to read: “and that will not <i>individually or</i> cumulatively create the future necessity or expectation of public facilities and utilities at urban levels of service.” Urban level of services is a vague term, it can mean hard infrastructure such as sewers or water systems, or it could be soft such as plowing roads to remove snow. Extending soft services such as plowing roads of snow to rural areas creates the expectation of more urban level services. The Kitsap United proposal is the type of proposal that by itself could

		create the expectation or need for urban levels of service.
23	Rural and Resource Lands Policy 12.1. Encourage development patterns in rural areas that provide safe, accessible pedestrian and bicycle connections between homes, businesses, and community destinations.	The word “<i>encourage</i>” should be changed to “<i>manage</i>”. Unlike some other goals that include caveats with wording the effects “minimize environmental degradation” this goal does not. Trails along streams and associated crossing disrupt riparian habitat. These issues were described in the Tribe’s responses to the Comp Plan update and revisions to the COA, which are incorporated by reference. Furthermore, the wording “<i>accessible pedestrian and bicycle connections between homes, businesses, and community destinations</i>” describes an urban level of infrastructure, such as sidewalks.
23	Rural and Resource Lands Goal 13. Protect natural ecosystems and resources in the rural area, including ground and surface waters, soils, and forested areas. • Rural and Resource Lands Policy 13.5. Identify and protect natural areas contributing to aquifer recharge.	As has been frequently communicated to the County, the narrow focus on protecting areas contributing to aquifer recharge – which means CARAs – overlooks those areas contributing to stream base flows, cold water upwelling, <i>etc.</i> that are not associated with CARAs, but are essential to maintain streams and the life the streams support
24	Rural and Resource Lands Policy 15.2. Develop strategies to address and mitigate flooding, tree damage, and infrastructure conflicts caused by beaver activity.	This statement is very broad and applies to beaver activities located within critical areas and their buffers. Material beavers take from “<i>damaged</i>” trees besides being used as food is used to construct dams, which in turn create habitat for fish, provide water during the low flow period, <i>etc.</i> Any strategy must consider there are differences between flooding and

		tree “damage” within critical areas and their buffers and those outside. Furthermore, if the County did not allow buffer reductions on streams, there would be less interactions with beavers. Additionally, if the County upgraded its numerous undersized culverts to an adequate size, there would be less blockages created by beavers as beaver prefer to build dams in undersized culverts.
24	Rural and Resource Lands Goal 16. Reduce stormwater impacts on salmon and streams in rural areas by using low-impact development, minimizing impervious surfaces, and protecting natural drainage and riparian areas. • Rural and Resource Lands Policy 16.1. Preserve and restore stream buffers and natural drainage corridors to maintain water quality and salmon habitat. • Rural and Resource Lands Policy 16.2. Encourage use of rain gardens, permeable surfaces, and other low-impact stormwater techniques in rural development and road improvements.	These are statements not linked to any analytical requirement. The County needs to quantify reductions in water available for infiltration. A surrogate for that would be the difference between the mean annual volume of water discharged from a site post-development compared to pre-development. See Tribe’s comments on the Comp Plan DEIS (“<i>Comments on 2024 Comprehensive Plan Update Draft Environmental Impact Statement Kitsap County</i>” dated 26 February 2024) and the CAO revisions ((<i>Draft Kitsap County Critical Areas Ordinance Update</i>”) dated 26 April 2024 which are incorporated by reference here, for more details.
24	Rural and Resource Lands Goal 17. Protect and enhance wildlife corridors and habitat connectivity in Kitsap County to support biodiversity, allow species movement, and maintain healthy ecosystems while balancing rural character and land use needs. • Rural and Resource Lands Policy 17.1. Identify and prioritize wildlife corridors and habitat areas using best available science and regional coordination.	See comments to page 9 re corridors. Additionally, the WDFW had a habitat map that identifies high quality habitat and corridors. That information needs to be incorporated into the County’s planning. Furthermore, in addition to guidance and regulations for creating and maintaining corridors for animals, there needs to be guidance to minimize wildlife human conflicts.

	- Rural and Resource Lands Policy 17.2. Collaborate with state, tribal, regional, and local partners to support long-term habitat connectivity. - Rural and Resource Lands Policy 17.3. Develop and adopt a Wildlife Corridor Plan that identifies, prioritizes, and protects critical wildlife corridors and habitat connections across Kitsap County.	Many new residents to rural areas are alarmed by the sighting of mid to large size carnivores and guidance to minimize conflicts or interactions would reduce calls to the County.
Ordinance No. ####-#### 1 RELATING TO GROWTH MANAGEMENT, AMENDING THE COMPREHENSIVE PLAN AND MAP AND AMENDMENTS TO TITLE 17 (ZONING)		
3	Tribal Coordination Meetings. County staff provided a project presentation early in the process, holding several staff-to-staff meetings mid-year, and additional meetings and presentations in September with Tribal staff from Tribal governments (Suquamish, Port Gamble S’Klallam, Squaxin Island, and Point No Point Treaty Council).	More detail should be presented regarding concerns raised. More importantly, the County should indicate which concerns were raised and how the County addressed them.
8	“Family day care provider” means a child care provider who regularly provides early childhood education and early learning services for not more than 12 children at any given time in the provider’s home in the family living quarters,	Twelve children at once in a day care center, even if located in a home, is an urban level of surface. The number should be capped at three or four.
9	Section 13. Kitsap County Code Section 17.410.042 Rural, Resource, and Urban Residential Zones Use Table, last amended by Ordinance 641-2025	Child care centers should not be a permitted use in Rural Protection and Rural Wooded zoning. Family Day Care Providers should not be a permitted use in Rural Protection and Rural Wooded zoning.
13	Child care center. Driveway paving, widening and sight distance verification may be required for safe ingress/egress and connection to a public roadway	Given the history of legacy and non-conforming lots it is likely that some driveways where widening or paving might be required will lie within critical areas or buffers. Reasonable Use Exceptions or variances should not be granted in such cases to allow for the use of this sites.

DRAFT STAFF REPORT 2025 Year of the Rural		
3	Community Consultations and Stakeholder Engagement. In 2025, County staff convened various meetings or outreach with stakeholder groups to present and discuss the Year of the Rural project. The groups included but were not limited to Kitsap County Child Care Task Force, Kingston Rotary, Kitsap Alliance of Property Owners, Tribal Coordination Meetings , Great Peninsula Conservancy, a gravel pit owner, Washington DNR, Kitsap Environmental Coalition, Kitsap County Public Health, and reclassification request applicants.	See previous comments upon Tribal coordination. Additionally, a complete listing of the groups to which the County conducted outreach or those that participated in the various meetings would enable a fuller understanding of the balance between outreach to and participation by development and environmental groups
4	Tribal Coordination Meetings. County staff provided a project presentation early in the process, held several staff-to-staff meetings mid-year, and additional meetings and presentations in September with Tribal staff from Tribal governments (Suquamish, Port Gamble S’Klallam, Squaxin Island, and Point No Point Treaty Council).	See previous comments upon Tribal coordination.

Thank you for the opportunity to comment on draft Rural Resource Lands Chapter of the Comprehensive Plan, proposed updates to rural development codes, and site-specific reclassification requests. The Tribe looks forward to working with the County to help the County better understand the Tribe’s concerns. If you have any questions, please contact me directly at 360-394-8449.

Sincerely,

Rod Malcom
Biologist
Suquamish Tribe



PORT GAMBLE S'KLALLAM TRIBE
NATURAL RESOURCES DEPARTMENT
31912 Little Boston Rd. NE – Kingston, WA 98346

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November 10, 2025

Heather Cleveland, AICP Long Range Planner
Department of Community Development
Planning and Environmental Programs
HCleveland@kitsap.gov

SUBJECT: Draft Year of Rural Comments

Dear Ms. Cleveland,

Thank you for the opportunity to comment on the proposed changes to the Rural and Resource Lands Chapter Update to the Comprehensive Plan, Code Updates, and the Reclassification Requests. The Port Gamble S'Klallam Tribe has been engaged in the Year of the Rural from the beginning and has met with you and other county staff through a number of different venues. We appreciate the conversations that we have had about this important topic, and our comments below are a continuation of concerns already laid out for county staff, the Planning Commissioners, and the Board of County Commissioners. Thank you for your consideration of the comments below.

Port Gamble S'Klallam Tribe's Treaty Right Interests

The Port Gamble S'Klallam Tribe is a federally recognized Indian tribe and successor in interest to Indian bands and tribes signatory to the 1855 Treaty of Point No Point, which among other things reserved fishing, hunting, and gathering rights and led to the establishment of the Port Gamble S'Klallam Reservation in Kitsap County, Washington. The Port Gamble S'Klallam Reservation sits on the eastern shore of Port Gamble Bay and a portion of Hood Canal, in the northwestern portion of Kitsap County. Since time immemorial, the Port Gamble S'Klallam Tribe and its predecessors have occupied and utilized vast areas of land and water in the Hood Canal, Salish Sea, and the Strait of Juan de Fuca including the western portions of Kitsap County that contain watersheds that drain into the Hood Canal, and the Olympic Peninsula to support the S'Klallam way of life.

Fish and fish habitat are crucial to the cultural, spiritual, subsistence and commercial activities of the Port Gamble S'Klallam Tribe. A change in how future development in the county is needed to support and enhance the protection of essential habitats and cornerstone species. A Report from the Treaty Indian Tribes in Western Washington, Treaty Rights At Risk, published July 14, 2011, states that "Habitat loss and degradation are the biggest contributors to the decline of the salmon resource..." (pg. 7) The issues identified in this report, losing habitat, disparate standards for harvest vs. habitat, need for coordinated leadership are all still applicable fourteen years later. We are still seeing habitat loss and would like to see preservation and monitoring of habitats permitted to be impacted by development.

Land Use & Zoning Comments

The connection between Rural and Resource Lands Element and implementation updates in the Zoning Code are missing. For example, there are no changes to zoning or to the growth projection of 24% (Comprehensive Plan pg. 24) in rural areas that would preserve rural character. Limiting Rural Residential



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zoning expansion and directing rural parcels to aggregate in size (with willing property ownership) are steps the county can take to implement the Rural and Resource Lands Element. Limiting development in rural areas will have a significant positive impact on preservation of rural character and protections of fish and wildlife habitat conservation areas such as streams, riparian habitat, and wetlands. If there are no amendments proposed to specific zoning standards and growth mandates, how will rural development and protection of rural character be implemented?

Change in Rural Land Use Designations. Please provide the tribe with the following data:
Thank you for acknowledging the tribe's request for information related to acres of rural land use designations. Please provide this information directly to the tribe when it is available.

Thank you for including Tribal Lands as part of the ownership/use in rural areas. Please also add that the County is obligated to protect treaty reserved resources that go beyond cultural resources.

Expand the "Tribal representatives" section on Page 5 of the RRL Element. Describe the specific tribe and the representatives that county staff met with for context. Each tribe is unique and has unique issues.

Page 17 of the RRL element, Port Gamble S'Klallam Tribe supports comments offered by the Suquamish Tribe related to rural densities that can be sustained by "rural levels of infrastructure and will not individually or cumulatively create the future necessity or expectation of urban levels of service". There is a lot of misunderstanding in the community regarding the types of services they need vs what they receive as a rural resident. Ensure public education on this topic and adopt policies that ensure rural development and rural infrastructure are connected.

Cluster Development is considered a tool for rural development. A tool that protects more critical areas by consolidating development into a denser area. However, this type of development results in something that looks and feels more urban in nature. The tribe has asked for this tool to be removed in rural development, and now a policy, "Clustering may be allowed where appropriate." has been added. No code or standards have been added that describe what "appropriate" is. This needs more work. If this type of development is added, please ensure rural cluster proposal requests contain detailed information on how the project complies with GMA and previous hearings board decisions regarding rural character and sprawl.

Add provisions that emphasize ADUs are encouraged in urban growth areas or LAMIRDs, not in rural areas.

Reclassification requests should not be approved. Additional rural development is not needed in the county. Development increases in rural areas disproportionately impact critical areas and environmental integrity.

Wildlife Corridors

Small peninsula areas isolated by water and development, such as the PGST reservation, face critical ecological challenges without connections to larger mainland habitats. Wildlife populations suffer from genetic bottlenecks, disrupted migration patterns, and inability to adapt to climate change. Climate



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change adds urgency to corridor development in isolated regions, as species must be able to shift their ranges and elevations as temperatures rise. Wildlife corridors serve as vital lifelines, allowing animals to move between habitat patches for breeding, foraging, and seasonal migration. This genetic exchange prevents inbreeding depression and maintains the genetic diversity necessary for species adaptation and survival. For culturally significant species like deer, black bears, elk, and mountain lions that require large territories, corridors enable access to the expansive ranges they need to find mates and adequate resources. These isolated populations gradually decline toward local extinction as they cannot maintain viable breeding numbers or fulfill essential ecological functions. Establishing wildlife corridor connections to the Kitsap and Olympic peninsula's larger habitat zones is essential for preserving wildlife species biodiversity, and ensuring species can survive environmental changes.

We look forward to working with you on implementing these changes. Much more work is yet to be done to ensure our sovereign tribal treaty rights are protected for the next seven generations. Especially as we brace for the impacts that climate change and continued development will have on all our natural resources.

Thank you again for the opportunity to comment during this process. Should you have any questions, please contact Marla Powers at the address or phone number below.

Sincerely,

A handwritten signature in black ink that reads "Marla S. Powers".

Marla Powers, Environmental Planner, Natural Resources Department
Port Gamble S'Klallam Tribe
31912 Little Boston Road NE
Kingston, WA 98346
(360) 689-7551 mpowers@pgst.nsn.us

Enclosure: Treaty Rights At Risk Report

**A REPORT FROM THE
TREATY INDIAN TRIBES IN WESTERN WASHINGTON**

Treaty Rights At Risk

**Ongoing Habitat Loss, the Decline of the Salmon
Resource, and Recommendations for Change**

July 14, 2011

Executive Summary

This paper examines how the rights of western Washington treaty tribes to harvest treaty fish and shellfish, and the federal government's salmon and orca protection efforts, are at grave risk. This is being caused by a lack of coordinated federal leadership, a failure to exercise authorities and the disparate application of salmon conservation measures. The U.S. government must step up and provide the leadership needed to resolve these issues if salmon are to be successfully recovered and protected.

Stopping habitat degradation is the cornerstone of salmon recovery, but habitat is still declining.

According to the Puget Sound Chinook Salmon Recovery Plan developed by the state and tribal salmon co-managers and adopted by the National Marine Fisheries Service (NMFS), protecting existing habitat is *the most important action needed in the short term*. Despite this commitment, NMFS' 2010 assessment of the Puget Sound Chinook Salmon Recovery Plan declared that habitat is still declining and protection efforts need improvement.

Tribal harvest is accountable and tribes are doing their share to promote recovery.

In 1974, the federal court decision in *United States v. Washington* – known as the Boldt decision – affirmed the tribes' treaty right to half of the harvestable salmon, and established the tribes as co-managers of Washington fisheries. Initially, this recognition of the tribes' rights led to a significant increase in treaty harvest because the tribes finally were able to catch their share. However, harvest has been and continues to be constrained dramatically by degraded habitat. As a direct result, treaty harvest has been diminished to levels not seen since before the Boldt decision.

Tribal co-management of harvest is governed by the tribes' commitment to support salmon rebuilding efforts. NMFS' own analysis of recovery plan implementation indicates that harvest is doing its share to support salmon recovery. NMFS also concedes that salmon populations in many watersheds cannot recover even if harvest were completely eliminated. Yet, while harvest is accountable for recovery, habitat degradation continues steadily, destroying the salmon resource and along with it, the cultures and communities of the treaty Indian tribes in western Washington.

NMFS is applying disparate conservation standards to harvest actions versus habitat actions, thereby threatening treaty rights and impeding salmon recovery.

NMFS holds the tribes to a different standard than all others by applying more stringent standards to tribal salmon harvest than to actions that degrade salmon habitat. In reviewing harvest decisions, NMFS expects tribal harvest plans to

contribute to salmon recovery over time. In contrast, when reviewing actions affecting Puget Sound habitat, NMFS seeks merely to maintain existing habitat productivity and quantity – regardless of whether it is adequate to support recovery.

NMFS' Biological Opinion and Reasonable and Prudent Alternative (RPA) for the Federal Emergency Management Agency (FEMA) National Flood Insurance Program is a key example of this disparate treatment. This flood insurance program sets the minimum requirements for floodplain management throughout most of Puget Sound. However, NMFS does not require an increase in habitat productivity and quantity, even in watersheds where NMFS concedes that habitat conditions are the key obstacle to salmon recovery. Another example of disparate treatment is NMFS' approach to southern resident killer whales (orca). NMFS claims orca are not recovering because there are too few large chinook salmon for them to eat. But instead of addressing all activities that affect chinook abundance, NMFS looks only to harvest reductions to address the problem.

This overemphasis on harvest restricts the tribes' treaty rights, while ignoring the science that indicates that habitat loss and degradation account for an even greater take of salmon and orca. These discriminatory actions contravene the federal government's trust responsibility to the western Washington treaty Indian tribes and undermine accomplishment of federal fish and wildlife management objectives.

The federal government is not fully implementing its obligation to protect treaty rights.

Salmon recovery is based on the crucial premise that we can protect what habitat remains while we restore previously degraded habitat conditions. Unfortunately, significant investments in recovery may not be realized because the rate of habitat loss continues to outpace restoration. The resulting net decline in habitat demonstrates the federal government's failure to protect the tribes' treaty-reserved rights.

The federal government has existing tools that it could employ to better protect habitat and support salmon recovery, but in many cases those tools are either misapplied or not being implemented adequately. For example, the U.S. Army Corps of Engineers' § 404 permitting authorizes the very same structures that salmon recovery actions seek to remove. Also, the federal government has approved and continues to fund state programs under the guise of coastal zone management that actually impede salmon recovery. For instance, the state's Shoreline Management Act also permits shoreline development for single-family residences, including bulkheads and docks that degrade habitat.

Instream flows also are under assault and need protection from excessive withdrawals. The tribes have pursued a number of approaches to define and

establish the instream flows necessary to protect and restore salmon resources. Unfortunately, each of these efforts has been undermined by flawed state policies that failed to institute a comprehensive effort to establish instream flows. Therefore, federal intervention is needed to adjudicate instream flows that are protective of fish habitat, and consistent with treaty-reserved rights.

Finally, federal agencies such as NMFS have failed to use their authority to prosecute those who degrade salmon habitat. In July 2000, NMFS formally published its policy governing enforcement of the Endangered Species Act (ESA) prohibition against take, and included a series of habitat impacts that would receive “heightened scrutiny.” Although shoreline armoring and riparian vegetation removal were on NMFS’ priority list, there appears to be only one instance of NMFS exercising its enforcement authority over these activities during the past decade.

Salmon recovery crosses many jurisdictions, and leadership is needed to implement recovery consistently across those jurisdictional lines.

The government’s piecemeal approach to recovery has resulted in a lack of agency consistency and ultimately the implementation of federal programs that serve neither to recover salmon nor protect treaty rights. For example, many federally funded environmental and conservation grant programs are not required to protect salmon. Instead, in many cases those programs rely on a planning process that ultimately lets the landowner decide what is best for salmon, even if those choices are contrary to federally approved total maximum daily loads (TMDLs) or federally-approved salmon recovery plans.

Moreover, despite ESA listing, and declining harvest and habitat, basic federal obligations remain unfulfilled. For example, the National Oceanic and Atmospheric Administration (NOAA) and U.S. Environmental Protection Agency (EPA) have failed to use their authority under the Coastal Zone Management Act (CZMA) to protect salmon and treaty rights. The CZMA obligates EPA and NOAA to assure that state nonpoint source coastal protection plans are consistent with applicable federal law, including the Clean Water Act, ESA, and federally secured treaty rights. These plans were supposed to be developed by 1995, but 17 years later, the federal agencies have failed to obtain the state of Washington’s compliance.

Given the critical importance of protecting habitat, it is essential that leadership is exercised to ensure that these basic federal obligations are met, including protection of treaty rights.

The federal government can remedy this erosion of treaty-reserved rights by taking action:

I. Stop the disparate treatment of Indian tribes when applying salmon conservation measures.

- Apply at least as stringent a conservation standard to actions affecting salmon habitat as is applied to salmon harvest.
- Assure that all federal actions affecting habitat contribute to recovery of salmon and orca.
- Develop a comprehensive and timely plan for addressing orca prey consumption needs that does not result in disparate treatment of treaty fishing and addresses all identified factors for decline.

II. Protect and restore western Washington treaty rights by better protecting habitat.

- Require federal funding that supports state programs and pass-through grants to be conditioned so that all funded efforts are designed to achieve consistency with state water quality standards and salmon recovery plan habitat objectives.
- Direct federal agencies to increase enforcement of federal obligations to protect habitat including the ESA and Clean Water Act.
- Direct NMFS and EPA to assure that state Shoreline Master Program updates are consistent with all federal obligations involving treaty rights.
- Direct the Department of Justice to initiate limited water rights adjudications to identify treaty-reserved rights for instream flows in selected watersheds.

III. Establish federal oversight and coordination to align environmental and conservation programs to achieve salmon recovery and protect treaty-reserved rights.

- Oversee and align funding programs to ensure achievement of recovery objectives.
- Unify federal agencies and resolve inter-agency conflicts to support salmon recovery.
- Hold federal agencies accountable for acts or omissions that lead to disparate treatment of tribes and failure to protect treaty-reserved rights.
- Harmonize federal actions to ensure consistency and compliance with federal obligations and treaty rights.

Introduction

“Through the treaties we reserved that which is most important to us as a people: The right to harvest salmon in our traditional fishing areas. But today the salmon is disappearing because the federal government is failing to protect salmon habitat. Without the salmon there is no treaty right. We kept our word when we ceded all of western Washington to the United States, and we expect the United States to keep its word.” – BILLY FRANK JR., CHAIRMAN OF THE NORTHWEST INDIAN FISHERIES COMMISSION

As sovereign nations, 20 treaty Indian tribes in western Washington signed treaties with the United States, ceding most of the land that is now western Washington, but reserving our rights to harvest salmon and other natural resources. For those rights to have meaning there must be salmon available for us to harvest.

Today our fishing rights have been rendered almost meaningless because the federal and state governments are allowing salmon habitat to be damaged and destroyed faster than it can be restored. Salmon populations have declined sharply because of the loss of spawning and rearing habitat. Tribal harvest levels have been reduced to levels not seen since before the 1974 *U.S. v. Washington* ruling that reaffirmed our treaty-reserved rights and status as co-managers with the right to half of the harvestable salmon returning to Washington waters.

As the salmon disappear, our tribal cultures, communities and economies are threatened as never before. Some tribes have lost even their most basic ceremonial and subsistence fisheries – the cornerstone of tribal life.

The Northwest tribes are heartened by millions of dollars and years of focused cooperative work that have been spent on salmon recovery in the region during the past two decades. We have been at the center of most of these efforts. While we have made progress in some areas, the overall quality and quantity of salmon habitat continues to decline. Four species of salmon in western Washington are listed as “threatened” under the Endangered Species Act, some for more than a decade.

Our considerable investment in habitat restoration has not been able to turn the powerful tide of loss and degradation. We are steadily losing habitat throughout the region, and that trend shows no sign of improvement.

The reason is not a lack of effort or a lack of desire to recover salmon. The reason is a lack of federal and state government leadership, policy, commitment and coordination toward a set of salmon recovery goals and objectives.

We know that we cannot stop the massive population growth anticipated in this region over the coming decades, but we can ensure that the associated development is designed and implemented in ways that will better protect salmon and its habitat.

Habitat loss and degradation are the biggest contributors to the decline of the salmon resource, yet the federal government's primary response is to restrict harvest. Tribes are required to prove that our fishing and hatchery plans will lead to increased salmon populations and will not harm ongoing wild salmon recovery efforts. But we have observed that those who damage and destroy salmon habitat aren't held to the same standard.

Instead, the U.S. government continues to approve federal actions and federally funded state actions that either do not contribute to, or actually impede recovery of salmon habitat. The result is the continued slow degradation of habitat that already has suffered from years of pollution, poor land use practices, and other factors. This situation sets the bar higher and higher for tribes to continue our way of life, while setting it lower and lower for those who would destroy the salmon's home. This uncoordinated approach solidifies habitat losses and ultimately fails to protect our huge investment of funding, time, and effort.

The federal government's over-reliance on restricting harvest as the primary means to protect salmon is unfair, ineffective, and contrary to established principles of Indian law. In the end, this policy undermines the recovery of salmon and other listed species in western Washington. Like harvest and hatchery operations, habitat quality and quantity must be calibrated across the spectrum of agencies and jurisdictions involved in salmon recovery.

Salmon recovery begins and ends with habitat. No amount of fishery restrictions can restore the resource unless salmon have good spawning and rearing habitat.

An example is the Nisqually River, with its headwaters in a national park and its mouth in a national wildlife refuge. It is one watershed in Puget Sound where we have made significant habitat gains in recent years. More than 85 percent of lower river estuary habitat has been reclaimed through cooperative federal, tribal, and state work to remove dikes; nearly 75 percent of mainstem river habitat is in permanent stewardship.

Despite this massive cooperative effort, research shows that young ESA-listed salmon and steelhead from the Nisqually River are dying before they can reach Seattle, just 30 miles away. The main cause is believed to be a lack of good nearshore habitat caused by ongoing development practices.

If salmon are to survive, we must begin to achieve real gains in habitat protection and restoration. The path we are on leads to the extinction of the salmon resource and our treaty-reserved rights.

The federal courts have recognized four basic values associated with the treaty-reserved rights of the tribes: (1) conservation value of the resource, (2) ceremonial, religious, and spiritual values, (3) subsistence, and (4) commercial value. The treaty right to fish is a property right of the tribes and is protected under the Fifth Amendment of the U.S. Constitution, our treaties and the U.S. Supreme Court affirmation of this right.

In failing to protect salmon habitat, the federal government is failing in its trust responsibility to honor its treaties with the tribes. We are left with few choices other than the courts to protect our treaty-reserved rights and the salmon that are so essential to our culture.

We are at a legal and biological crossroads in our efforts to recover the salmon and preserve our tribal cultures, subsistence, spirituality, and economies. Not since the darkest days of the fishing rights struggle before Judge Boldt's decision in *U.S. v. Washington* have we feared so deeply for the future of our treaty rights.

This document discusses specific federal government actions that are impeding salmon habitat recovery and restoration, including:

- The application of disparate standards to harvest and habitat.
- Failure to protect treaty rights and financial investments by fully implementing existing federal authority.
- A general lack of alignment by the federal government of its actions with salmon recovery efforts.

This document also recommends specific solutions that will help the federal government meet its trust responsibilities to the treaty Indian tribes in western Washington as we rebuild the salmon resource. Broadly, those actions encompass:

- An urgent call for the federal government to hold the degradation of habitat to the same standards applied to tribal harvest.
- A demand that federal government begin to protect treaty-reserved rights by better protecting habitat.
- Urging federal leadership to provide leadership and oversight to ensure alignment and harmonization of federal programs with salmon recovery efforts.

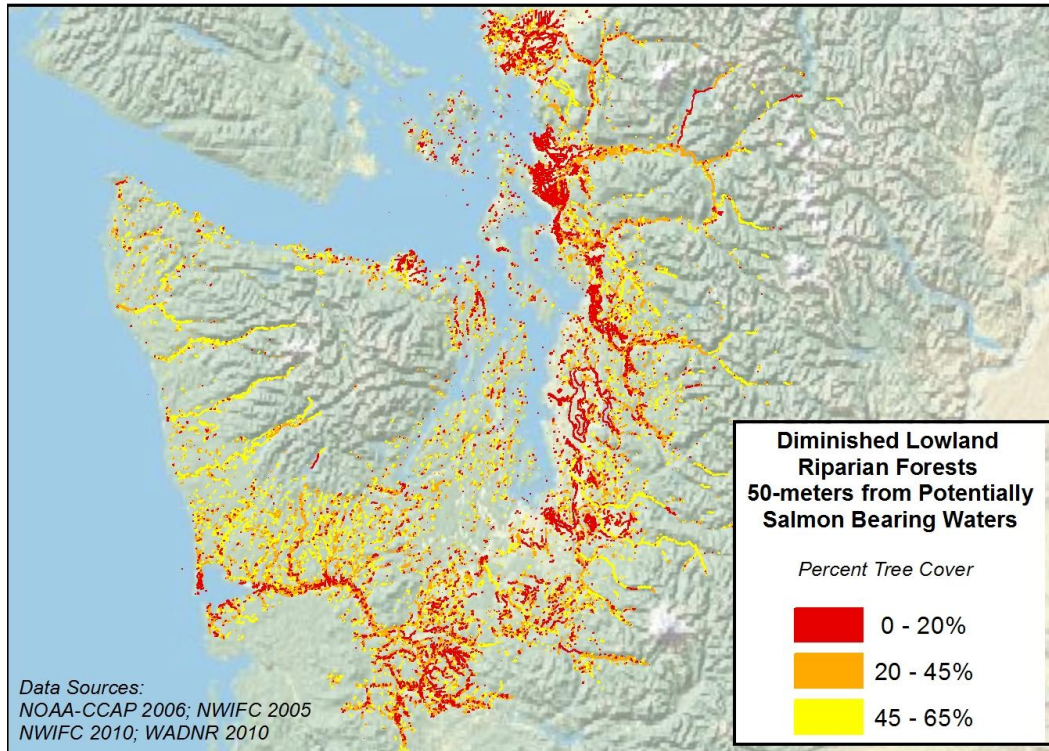
These actions are critical to reverse the trend toward extinction, and ultimately to recover salmon and restore treaty-reserved harvest rights.

Salmon Habitat Still Declining Despite Recovery Efforts

“We have worked for decades to restore habitat in the Elwha River system, and we are still not fishing on the salmon stocks we have been working to protect. We had to push for an act of Congress to remove two fish-blocking dams on the river, but the way it’s going now, we still may never be able to fish for chinook again.”

– RUSS HEPFER, LOWER ELWHA KLALLAM VICE CHAIRMAN

Diminished riparian forests in the lowlands of Western Washington continue to impair habitats critical to the recovery of the region’s anadromous salmon.



Wild salmon are naturally productive and have just a few basic needs for their survival: access to and from the sea, good spawning and rearing habitat, and the opportunity to reproduce.

Salmon harvest already has been eliminated to the point that further cuts can no longer contribute significantly to the recovery of wild salmon stocks. Yet habitat loss and degradation continue steadily destroying the salmon resource and along with it, the cultures and communities of the treaty Indian tribes in western Washington.

Protecting existing salmon habitat from further decline is the key to recovering endangered salmon populations. According to the 2007 Puget Sound Chinook

Salmon Recovery Plan adopted by NOAA Fisheries and developed by the state and tribal salmon co-managers, and numerous watershed entities:

Protecting existing habitat and the ecological processes that create it is *the most important action needed in the short term* to increase the certainty of achieving plan outcomes. Protection must occur in both urban and rural areas if we are to ensure the long-term persistence of salmon in Puget Sound.¹

In the final supplement to the recovery plan, NMFS concurs with the imperative of immediate habitat protection, stating that “protecting functioning habitat is one of the top priorities and first steps for achieving a viable ESU (evolutionarily significant unit).”²

However, despite ESA listing of Puget Sound chinook in 1999 and the subsequent call for enhanced protections of remaining habitat, NMFS’ 2010 assessment of the Puget Sound Chinook Salmon Recovery Plan declared:

- Habitat is still declining; and
- Habitat protection needs improvement.³

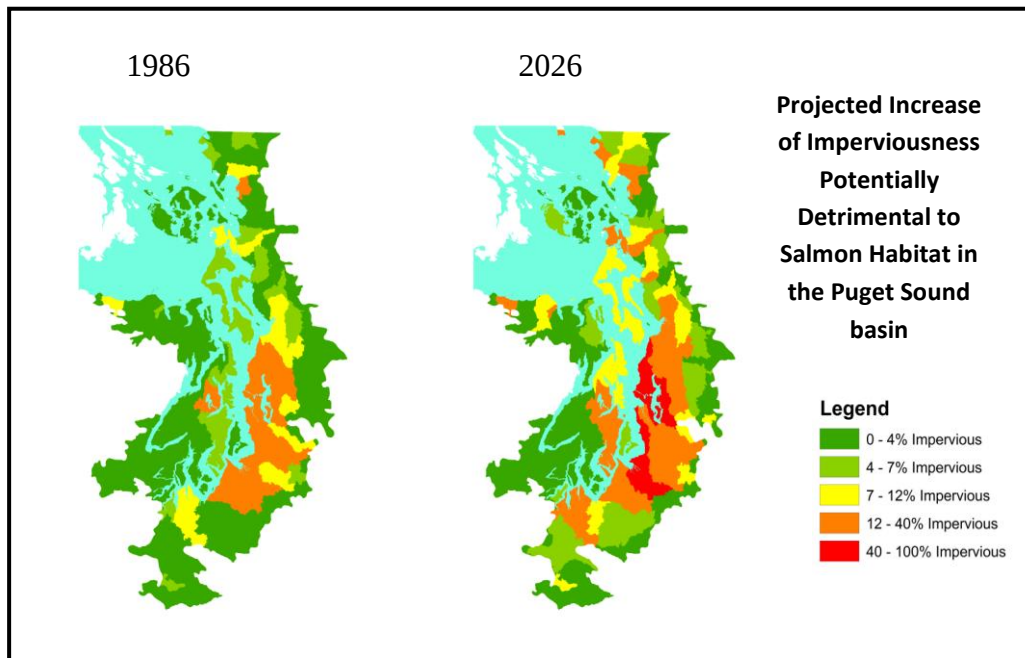
The status and trend data summarized in the NMFS report revealed extensive habitat losses across key indicators such as intertidal wetlands and forest cover. The report identified declining trends in habitat by comparing both historical data and trends since the ESA listing of Puget Sound chinook salmon.⁴ For example:

- After ESA listing, from 2001 to 2006, about 10,700 acres of forest and 4,300 acres of agricultural land were converted to impervious surfaces.⁵
- Washington has lost an estimated 70 percent of its estuarine wetlands, and 90 percent of its old-growth forest. Together, these native habitat types have been considered among the most diverse and productive in the state.⁶

Other studies and analyses echo the NMFS report findings. Key indicators of a declining trend in salmon habitat include:

- Since the ESA listing of Puget Sound fall chinook in 1999, loss of shoreline habitat and function through shoreline armoring continues at a rate of 1.5 miles per year.⁷
- 83 percent of waters sampled to compile the state’s 305(b) and 303(d) Clean Water Act lists violate state water quality standards and are polluted.⁸
- About half of critical low gradient riparian forest habitat has insufficient forest cover to support salmon.⁹

- A Puget Sound Nearshore Ecosystem Restoration Project study revealed dramatic losses of habitat in all but one place in the sound during the last 150 years.¹⁰
- Hood Canal is highly impaired by a lack of dissolved oxygen, and the resultant hypoxia causes fish kills.¹¹
- Eelgrass beds, essential to the intricate food web for salmon, are in overall decline.¹²



In a recent geographic information system (GIS) analysis of Puget Sound land cover data and population growth rates,¹³ existing and projected trends demonstrate dramatic increases in the conversion of vegetated areas to concrete. These increases in impervious surfaces impact salmon habitat by removing essential vegetation and biota, increasing runoff, conveying pollutants, and altering hydrology. Without appropriate planning, placement, and mitigation, these actions will continue to imperil salmon.

Trends at the watershed scale in western Washington also provide a bleak outlook:

- Within the Stillaguamish watershed, during the time period of 1996 through 2006, there was a decrease of 41 percent in forest cover within the Urban Growth Area and a 22 percent decrease of forest cover inside rural residential areas. Now, only 23 percent of the 1,777 acres of riparian area within the floodplain have any forest cover.¹⁴
- In the Hoh watershed, approximately 31 percent of private forestlands were harvested between 1998-2010 (post ESA listing).¹⁵
- In the Snohomish watershed, dikes, levees, and flow devices have resulted in the loss of 55 percent of critical mainstem salmon habitat.¹⁶
- In the Port Gamble S'Klallam Tribe's usual and accustomed grounds, places such as Port Gamble Bay have had 74 percent of the shoreline armored or modified.¹⁷
- In the Skokomish basin, the watershed has experienced a 51 percent increase in impervious surfaces, with a third of that paving occurring just one mile from Hood Canal.¹⁸
- In the Muckleshoot Indian Tribe's area of concern, NOAA models predict that more than half of the stream miles of known coho salmon habitat will experience pre-spawn mortality rates greater than the average, and that 141 of those miles will experience mortality rates greater than 35 percent, when under normal conditions these rates are generally less than 1 percent.¹⁹

Loss of Harvest and Catch Opportunity

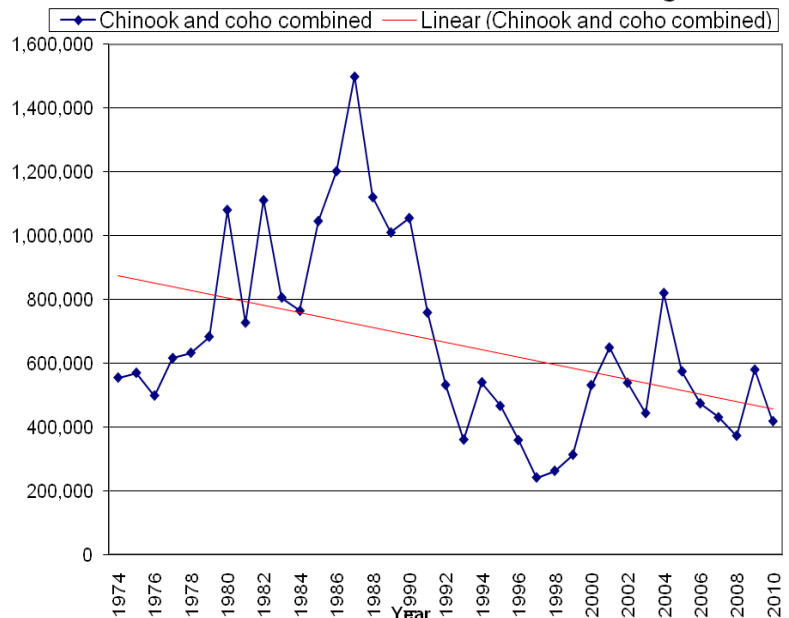
“We volunteered not to fish for chinook and to focus on the recovery of our salmon. But even with the nets out of the river, our fish numbers are not increasing. We work hard to restore habitat and recover Stillaguamish chinook, but in the meantime, our culture faces extinction. We are a living culture and we must have salmon to harvest.” –SHAWN YANITY, STILLAGUAMISH CHAIRMAN

Western Washington tribes pursued recognition of their treaty-reserved salmon fishing rights in *U.S. v. Washington* 384 F. Supp. 312 (1974) because their fisheries were being preempted by the state of Washington. The state was allowing its ocean and Puget Sound fisheries to overharvest returning adult chinook and coho salmon, but was denying the tribes’ treaty rights to fish in their traditional waters. Tribes were left with little or no fishing opportunity.

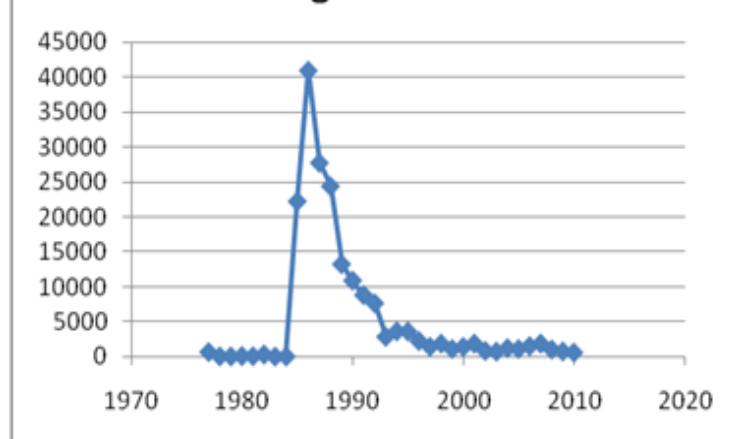
U.S. v. Washington – known as the Boldt decision – affirmed the tribes’ treaty fishing rights and established the tribes as co-managers of the resource with the right to half of the harvestable salmon returning to Washington waters.²⁰

The years following the 1974 ruling witnessed the growth of harvest opportunity and catch, as tribal fisheries accessed 50 percent of the harvestable run. A

Tribal Harvest in Western Washington



Tribal Steelhead Harvest in Puget Sound

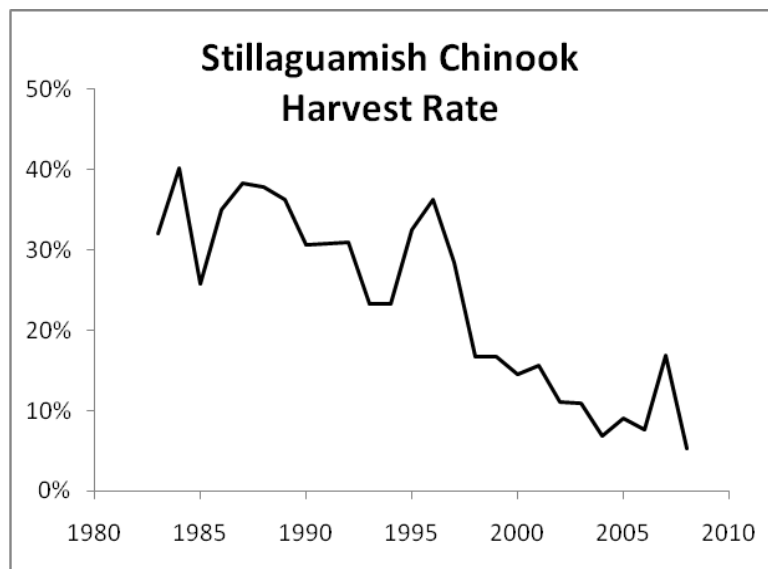


joint management framework developed by the state of Washington and the treaty tribes led to better balancing of harvest opportunity across all salmon fisheries.

Despite highly conservative fisheries and the prudent use of hatcheries, ongoing salmon habitat loss and degradation have led to pre-*U.S. v. Washington* tribal harvest levels. This habitat loss has continued even after the establishment of Puget Sound coho as a species of concern (1995), and the listing of Puget Sound chinook (1999) and steelhead (2007) as threatened under the Endangered Species Act.

For more than two decades, harvest rates in all fisheries have been sharply reduced to compensate for the precipitous decline of salmon abundance in Washington state waters, but today harvest cuts can no longer compensate for losses in salmon spawning and rearing habitat.²¹

Analysis of total U.S. harvest rates and run sizes for North Fork Stillaguamish River chinook illustrates this point. Washington harvest rates have been sharply and steadily reduced in reaction to declining returns. While this harvest action maintained spawning at targeted levels, it did not result in more fish returning to spawn, clearly indicating that factors other than harvest are responsible for the stock's decline.²²



As a result, the Stillaguamish Tribe's treaty-protected river fishery was effectively eliminated and with it, an essential element of tribal culture and source of traditional food. Although the action was not matched by other managers, the tribe gave up even its most basic treaty-reserved ceremonial and subsistence harvest for more than 25 years in an effort to ensure the conservation of this run. In recent years, the Stillaguamish people had to purchase fish from outside their river system to conduct the traditional first salmon ceremony that welcomes and honors the salmon that are the foundation of their culture.

Request for Federal Action

I. Stop the disparate treatment of Indian tribes when applying salmon conservation measures.

The Problem

Currently, NMFS holds the tribes to a different standard than all others by applying more stringent standards to tribal salmon harvest than to actions that degrade salmon habitat. NMFS requires salmon harvest to be managed to contribute to salmon recovery, but fails to apply a corresponding obligation to activities affecting salmon habitat. Similarly, NMFS claims that southern resident killer whales (orca) are not recovering because there are too few large chinook salmon for them to eat. But instead of addressing all activities that affect chinook abundance, NMFS looks only to harvest reductions to address the problem. The federal government continues to focus on restricting the tribes' treaty rights even though the science indicates that salmon will not recover or survive unless the government reduces the even greater take of salmon and orca caused by habitat loss and degradation. The federal government's disparate treatment contravenes its trust responsibility to the western Washington treaty Indian tribes and undermines accomplishment of federal fish and wildlife management objectives.

The Remedy

To eliminate these discriminatory practices, NMFS must hold habitat actions to no less a standard than harvest. Specifically, NMFS should be directed to:

- Apply at least as stringent a conservation standard to actions affecting salmon habitat as is applied to salmon harvest.²³
- Ensure that all federal actions affecting habitat contribute to recovery of salmon and orca.
- Develop a comprehensive and timely plan for addressing orca prey consumption needs that does not result in disparate treatment of treaty fishing.
- In areas where NMFS has declined to designate critical habitat, adopt commensurate harvest management policies.

How the federal government is failing in its trust responsibility:

NMFS applies disparate standards under the ESA, by treating harvest management requirements differently than habitat management requirements.

The Endangered Species Act (ESA) created a responsibility for federal actions affecting listed species to provide an adequate potential for recovery, not just maintain the degraded status quo. For example, as a consequence of the Ninth Circuit's decision in *NWF v. NMFS*,²⁴ the federal operating agencies and NMFS now recognize that the dams comprising the Federal Columbia River Power System are obligated to contribute to the recovery of salmon. In response to the decision, NMFS and the federal action agencies (in consultation with state and tribal co-managers) assessed the proposed operation of the dams and determined that it would jeopardize ESA-listed salmon. They also determined what improvements were necessary to assure salmon survival and "provide an adequate potential for recovery." Generally, any level of population growth greater than 1 to 1 replacement meets NMFS' interpretation of providing an adequate potential for recovery with respect to the Columbia River dams.²⁵ While there are differences of opinion among states, tribes, and federal agencies as to whether this interpretation adequately addresses recovery, no one questions that there is a recovery obligation on the Columbia River.

The western Washington treaty tribes' harvest plans are designed to contribute to recovery. NMFS has developed an elaborate procedure for determining whether the impacts of tribal harvest will interfere with recovery of Puget Sound chinook. This includes modeling the likely effects of harvest on 22 individual populations that make up the Puget Sound chinook evolutionarily significant unit (ESU). This analysis looks at the current productivity of existing habitat and assesses the likelihood of a given population falling below a certain critical level or rising above a rebuilding level. Using this approach, harvest is managed to assure both survival *and* eventual recovery.²⁶

In analyzing the tribes' harvest plan, NMFS also has stated that poor habitat productivity, not harvest, is the factor preventing chinook rebuilding in river systems such as the Nooksack, Puyallup, Sammamish, Skokomish, Dungeness, and Stillaguamish.²⁷ NMFS' own federal assessment of recovery plan implementation states that harvest has been managed consistently with this obligation to support recovery, while habitat continues to be the limiting factor to recovery.²⁸

In stark contrast to the standards applied to the harvest of listed salmon, NMFS' review of the Federal Emergency Management Agency (FEMA) floodplain insurance program does not address Puget Sound salmon recovery. Instead NMFS applies a no net loss standard that attempts, at best, to maintain existing degraded

habitat conditions. In September 2008, NMFS determined that the continued implementation of the National Flood Insurance Program in Puget Sound (and the land use practices that go along with it) jeopardizes the continued existence of chinook, steelhead, summer chum, and orca. FEMA's flood insurance program subsidizes the alteration and destruction of salmon habitat by providing inexpensive insurance coverage for property and structures that are built in the floodplain.²⁹ As required by the ESA when it finds jeopardy, NMFS designed a "reasonable and prudent alternative" (RPA) as part of its biological opinion (BiOp), to allow the flood insurance program to go forward. NMFS' RPA is intended explicitly to result in no net loss of floodplain habitat and no adverse impact to "protected areas" (riparian areas, floodways, and channel migration zones).³⁰ In other words, NMFS' RPA is intended to maintain current degraded habitat conditions.

In crafting its RPA, NMFS did not identify management practices intended to address the gap between current productivity of salmon habitat, and what is needed to provide an "adequate potential for recovery," as it did in the Columbia basin. In contrast, NMFS' analysis of the tribes' Chinook Harvest Plan includes harvest rate ceilings which insure that populations will achieve escapement levels consistent with rebuilding abundance, as needed to foster recovery.³¹ Essentially, NMFS fails to apply the same escapement and rebuilding levels required of tribes to its habitat protection decision in the FEMA BiOp.

The problem gets worse. Whereas the RPA calls for no adverse impacts in floodways, channel migration zones, and riparian areas, FEMA's response promises more habitat degradation and allows for local governments to permit development in these areas, with mitigation. NMFS is supporting this response.³² However, the initial failure of mitigation to alleviate the impacts of development in these areas is one of the reasons why treaty rights aren't being met and salmon became subject to the ESA.³³ Moreover, this is bad flood policy because this development impairs watershed flood capacity and exacerbates flood damages.

Along with allowing more habitat degradation, FEMA and NMFS are delegating to local governments the responsibility for deciding what riparian/floodplain salmon habitat still retains value and what habitat can be written off as undeserving of protection.³⁴ The federal agencies provide no watershed and salmon population context for how these decisions ought to be made. Nor do NMFS and FEMA explain how writing off salmon habitat is consistent with their obligations to support salmon (and orca) recovery and comply with treaty rights. Moreover, local governments have neither the expertise nor the interest in meeting these obligations.

Despite NMFS' findings regarding the crucial need for increased habitat quantity and productivity to reverse declining population trends, the FEMA BiOp and RPA lack specific provisions for improving habitat to assure the survival and eventual

recovery of these populations. By failing to hold FEMA's flood insurance program to the same standard that it holds harvest, NMFS both applies disparate treatment of treaty harvest and fails to apply conservation measures necessary to assure the survival and recovery of salmon (and the orca that depend on them). If Columbia River dams and Puget Sound treaty fisheries had been managed this way, ESA compliance could have been achieved by simply freezing salmon mortality levels to those occurring at the time salmon were listed. Obviously, this has not occurred.³⁵ To the contrary, exercise of treaty rights has been restricted and millions of dollars have been spent changing both the configuration and the operation of the dams, as needed to assure an adequate potential for recovery.

In “protecting” orca, NMFS focuses on chinook harvest while ignoring other more damaging impacts.

Southern resident killer whales (orca) were listed as “endangered” under the ESA in November 2005. Prior to December 2010, NMFS indicated that harvest did not significantly affect the availability of prey for orca. Since then, NMFS has gathered additional information regarding orca prey requirements, and concluded that further reduction of chinook harvest may be necessary for orca recovery.

The treaty tribes and states of Alaska and Washington have significant concerns regarding the quality of the new data and the assumptions underlying NMFS' analysis. However, should the data withstand rigorous scientific review, they underscore the need to protect and increase overall chinook abundance, not simply reallocate harvest from humans to orcas. Unfortunately, NMFS's current focus on the reallocation of harvest does not address important factors causing orcas' decline, including toxic contaminants, vessel disturbance, noise, and the continued loss and fragmentation of salmon spawning and rearing habitat.

NMFS, in cooperation with the Canadian Department of Fisheries and Oceans, is convening an expert panel and a series of workshops to evaluate the effects of salmon fisheries on orca. The workshops are being focused narrowly on just one factor that affects chinook abundance – harvest. They will not address key factors such as habitat, even though habitat decline is the critical factor limiting chinook abundance.³⁶ NMFS has declared that it will start identifying alternative harvest regimes in response to the workshop before the process is even complete. Essentially, NMFS is proposing to preempt their scientific process by acting on conclusions yet to be established. By any standard, this is not an objective approach.

If prey availability (i.e. chinook abundance) is an important problem affecting orca, then the federal government needs to address all the key factors. Other actions and policies affecting chinook abundance include land management, such as FEMA's National Flood Insurance Program, pesticide management, evaluation of Puget Sound hatchery programs, and NMFS' recently issued “Population Recovery Approach.”

For example, NMFS is consulting with the EPA about the impacts of a number of pesticides on ESA-listed salmon. Despite the evidence that orca are harmed by the toxic chemicals in the fish they eat³⁷, NMFS has yet to assess the impacts on orca from ingesting chinook exposed to pesticides and other toxic compounds. Given NMFS' findings that several of these chemicals pose jeopardy to Puget Sound chinook,³⁸ it would logically follow that NMFS should promptly assess the effects of these pesticides on orca, prior to altering harvest regimes and impacting treaty rights. However, NMFS continues to focus on harvest and ignore the impacts of pesticides on chinook, orca, and the tribes' treaty rights, even though action on toxic chemicals would provide benefits for chinook and orca, as well as improve the overall health of Puget Sound and all the people that reside within the region.

In the case of FEMA's flood insurance program, NMFS found that the program jeopardizes both chinook and orca. Since that 2008 finding was made, NMFS has modified its views regarding orca consumption of chinook. As a result, the impacts stemming from the flood insurance program pose even greater jeopardy to orca. Despite this, NMFS maintains its position that the flood insurance program is obligated only to preserve existing habitat conditions. Worse yet, as discussed above, FEMA's plan allows continued degradation of salmon habitat even though NMFS insists that more chinook are necessary for orca to survive and recover.

Again, the federal government imposes one standard on the treaty tribes and a less stringent standard on activities that jeopardize salmon. As a consequence, treaty rights are impaired and the species these rights depend upon will not recover. The federal government needs to address *all* the sources of the problem in a manner that is consistent with the salmon conservation necessity principles established in treaty case law.³⁹

Request for Federal Action

II. Protect and restore western Washington treaty rights by better protecting habitat.

The Problem

Although the federal government makes significant investments in restoring degraded habitat, it does not fully exercise its authority to protect the essential habitat that remains. Without these protections, overall habitat will continue to decline. This progressive habitat degradation will make recovery impossible and threatens the ability of tribes to protect, restore and exercise their treaty-reserved rights to fish.

The lack of habitat protection does not stem from an absence of authority – it is caused by the federal agencies’ inability to align environmental and conservation programs with recovery efforts, and to effectively implement and enforce existing laws. For example, federal funding from a number of agencies continues to support state environmental and conservation programs that are inconsistent with salmon recovery and do not achieve compliance with state water quality standards. Moreover, federal agencies have not enforced key environmental statutes such as the ESA, which could serve to protect salmon habitat.

The Remedy

Protecting salmon habitat is an essential element of the fiduciary duty to ensure that the tribes can exercise treaty-reserved rights. In implementing this duty, the federal government must employ *all* authorities and tools to leverage better habitat protection. Specifically, we ask the Administration to:

- Require federal funding supporting state programs and pass-through grants to be conditioned so that all funded efforts achieve consistency with state water quality standards and salmon recovery plan habitat objectives. Examples include:
 - Clean Water Act funds, National Estuary Program funds and Coastal Zone Management Act funds should implement actions designed to achieve state water quality standards, total maximum daily loads (TMDLs), and salmon recovery plan habitat objectives.
 - USDA funds, including Farm Service Agency (FSA) and National Resource Conservation Services (NRCS) programs should implement riparian buffers comparable to those that NMFS has called for in its RPA for FEMA’s National Flood Insurance

Program, and implement all other practices consistent with TMDLs, water quality standards, and salmon recovery objectives.

- Direct federal agencies to increase enforcement of their obligations to protect habitat, including the Endangered Species Act and Clean Water Act.
- Direct NOAA and EPA to ensure that state shoreline master program updates are consistent with all federal obligations, including treaty rights.
- Direct the Department of Justice to initiate limited water rights adjudication to identify treaty-reserved rights for instream flows in selected watersheds.

How the federal government is failing in its trust responsibility:

Habitat continues to decline despite investments in habitat enhancement.

Salmon recovery is based on the crucial premise that we can protect what habitat remains while we restore degraded habitat conditions. In the effort to restore salmon, many millions have been spent to protect and restore salmon habitat:

- The Salmon Funding Recovery Board has administered approximately **\$788 million** in federal, state, and local funds since 1999.⁴⁰
- The USDA's Farm Service Agency Conservation Reserve and Enhancement Program – developed to rebuild salmon habitat on agricultural lands – has allocated approximately **\$71 million** since 1998 (80 percent is federal).⁴¹
- Since 1987, the Department of Ecology has administered approximately **\$60 million** in federal clean water funds to protect beneficial uses – namely salmon.⁴²

Unfortunately, these and other significant investments in recovery may not be realized because the rate of habitat loss continues to outpace restoration.⁴³ This decline can be attributed to the fact that current habitat protection is contingent upon the same programs that existed prior to the ESA listing of Puget Sound salmon. Moreover, since ESA listing, these programs have yet to be recalibrated to protect salmon habitat. The result, as the NMFS report explains, is that the current habitat protection system is based on the very same programs that failed to prevent ESA listing.⁴⁴ Nonetheless, many of these outmoded tools continue to be funded by federal dollars and authorized by federal agencies without conditions to require recalibration and alignment with recovery objectives.

The federal government approves funding for state programs that should protect salmon habitat, but do not.

The federal government financially supports the development and implementation of Washington's Shoreline Management Act (SMA), because it is the cornerstone of the state's Coastal Zone Management Program (CZMP).⁴⁵ As a result, extensive coastal zone management funds have been given to local governments to develop local plans for their shorelines, and to the state government to subsequently approve them. Since these programs relate to the shorelines, they also govern a large portion of critical salmon habitat.

The SMA was adopted prior to the ESA listing of salmon and has never been calibrated to protect the species, habitat, or the financial investments to rebuild habitat. In fact, in some instances, the SMA has been used to undermine it. For example, Washington state's highest court struck down the City of Bainbridge Island's moratorium on shoreline development, passed in part to prevent potential impacts to endangered salmon.⁴⁶ The court rejected the city's protective efforts because its moratorium prohibited what the SMA permits – shoreline development for single family residences, including bulkheads, and docks.⁴⁷

Essentially, although the SMA is funded under the guise of coastal protection, it does not serve to protect coastal species such as ESA-listed chinook salmon and its habitat. In fact, as determined by the programmatic biological assessment for the Shoreline Master Program Guidelines:

Many project types specifically regulated by *and allowed* under the guidelines are likely to adversely affect proposed critical habitat for Puget Sound chinook salmon.⁴⁸

Another problem with the federally funded SMA program is that it employs a standard that is neither quantifiable nor specific enough to provide concrete performance standards to protect salmon habitat. For example, development of new SMA rules, which amended the state's CZMP, prompted NMFS to declare that the rules were so broad that they could not assess the effects of the rules on salmon.⁴⁹ Moreover, even the implementing state agency agreed that the SMA contains an incalculable performance standard, which the state then defers to local governments to quantify.⁵⁰

The nationwide permit system is streamlining habitat modification and inhibiting treaty rights.

The U.S. Army Corps of Engineers is responsible for permitting actions that discharge dredge and fill material into waters of the state. These actions commonly include shoreline armoring, stream modifications, and the attending maintenance of those structures. The Corps' nationwide permit process provides a streamlined system for this work. In the Seattle District, approximately 1,000 permits are obtained each year.⁵¹ The resulting cumulative armoring of waterways is a key cause for Puget Sound decline and habitat loss, in part because it affects nearshore fish abundance, distribution, and behavior patterns.⁵² Ironically, the Corps' streamlined system helps build the very structures in which we are investing federal funds to remove as part of habitat improvement projects.

State policies are not protecting instream flows necessary for salmon, and federal protection is needed.

For more than four decades, the western Washington treaty Indian tribes have pursued a number of administrative, cooperative, voluntary, and inter-governmental approaches to define and establish the instream flows necessary to protect and restore salmon resources. Unfortunately, each of these efforts has failed to institute a comprehensive effort to establish instream flows to protect and restore fish habitat consistent with the treaty-reserved rights of the tribes.

Tribes are left with few options, because of a combination of the state-based priority date for instream flows (which is junior to most appropriations); municipal water purveyors' ability to dewater streams; the state's broad use of a vague "public interest" exception to override habitat protection; and the unwillingness of the state to enforce its own laws or control the cumulative impacts from permit-exempt wells. Based on the policies of state law, it will be impossible to truly restore or, at best, protect instream flows. The federal government needs to aggressively secure the protection of tribal rights to instream flows and resources through initiation of litigation or limited adjudications.

Enforcement is necessary to implement salmon recovery, yet federal agencies fail to take action.

On July 10, 2000, NMFS published its take guidance for Puget Sound. It listed a range of activities most likely to cause harm to endangered salmon habitat, which therefore violate the ESA. Implementing this guidance is critical to supporting salmon recovery. There appears to be only one instance of NMFS exercising its enforcement authority over these activities during the past decade.⁵³ Aside from this anomaly, we know of no further instances of NMFS exercising its enforcement authority to protect habitat.

The first item on NMFS' list of harmful activities is constructing or maintaining barriers to fish passage, e.g., fish-blocking culverts.⁵⁴ The Washington Department of Fish and Wildlife recently disclosed that 30 percent of randomly sampled culverts, despite receiving a state permit in the last 10 years, still resulted in blocked fish passage.⁵⁵ A state report also noted that increased regulatory presence and subsequent enforcement were necessary to ensure that landowners complied with the ESA. However, NMFS has not instituted ESA enforcement to help remedy this.

Another example of an action known to harm salmon is shoreline armoring. Washington's Shoreline Management Act provides an exemption from state regulation for shoreline homeowners who armor their shoreline.⁵⁶ Between 2004 and 2008 alone, the Washington Department of Fish and Wildlife granted 456 permits for new bulkheads in Puget Sound. This doesn't include replacement of old bulkheads.⁵⁷ However, NMFS has not used its authority to address any of these harmful habitat modifications.

Request for Federal Action

III. Establish federal oversight and coordination to align environmental and conservation programs to achieve salmon recovery and protect treaty-reserved rights.

The Problem

The federal government has a fiduciary responsibility to exercise its authority so that the tribes receive the benefit of the rights they reserved in their treaties. In western Washington, the government's fiduciary responsibility includes the protection and restoration of salmon and the habitat needed to ensure their survival and recovery. However, the process of salmon recovery crosses many jurisdictions, and there is a lack of leadership to ensure that programs are implemented consistently across those jurisdictional lines. This piecemeal approach to recovery has resulted in a lack of agency consistency and the implementation of federal programs that serve neither to recover salmon nor protect treaty rights. For example, NMFS threatens significant changes in approaches to salmon harvest because of orca concerns. However, EPA and NOAA remain complacent about the state of Washington's 17 years of non-compliance with the Coastal Zone Management Act – a key salmon and orca recovery component. In the meantime, federally funded salmon restoration actions are undermined by state and federal permitting processes that degrade salmon habitat.

The Remedy

The tribes seek stronger federal leadership to oversee the salmon recovery process and ensure successful implementation of recovery actions across jurisdictional lines. This leadership must serve to:

- Align funding programs to ensure achievement of recovery objectives.
- Unify federal agencies and resolve inter-agency conflicts to support salmon recovery.
- Hold federal agencies accountable for acts or omissions that lead to disparate treatment of treaty tribes or failing to protect treaty-reserved rights.
- Harmonize federal actions to ensure consistency and compliance with federal obligations and treaty rights.

How the federal government is failing in its trust responsibility:

Federal funding lacks alignment with salmon recovery efforts.

Many state and federal grant programs, while intending to make improvements, lack mechanisms to ensure that projects are consistent with recovery and protect treaty-reserved rights. For example, water temperature is a limiting factor for salmon survival, and many western Washington watersheds are temperature-impaired. To address this type of water pollution, the state, with significant federal funding, follows the federal Clean Water Act process and develops temperature total maximum daily loads, or TMDLs. Temperature TMDLs develop site-specific prescriptions to reduce stream temperatures, which ultimately are approved by EPA.

However, there are no assurances or accountability mechanisms that ensure that these pollution control prescriptions get implemented through relevant federal programs. For example, despite the fact that grants are the only tool used to implement TMDLs, neither the state nor EPA require that grant recipients actually follow the specific requirements of the TMDL. Instead, in an effort to provide assurances of implementation efficacy, the state requires riparian buffers be a mere 35 feet wide, which under most circumstances does not satisfy the requirements of their own TMDLs,⁵⁸ let alone the needs of salmon.⁵⁹

Other state and federal conservation programs, such as the Natural Resources Conservation Service and Washington State Conservation Commission grants, also do not require their grant programs to implement these Clean Water Act prescriptions. Instead those programs rely on a planning process that ultimately lets the landowner decide what is best for salmon and water quality, even if those choices are contrary to federally approved TMDLs or salmon recovery plans.

Federal funding is not conditioned to ensure protection of treaty rights.

The tribes have called for state and federal action to better prevent pervasive pollution problems impacting treaty-reserved rights,⁶⁰ with little response or change. However, when non-Indian commercial shellfish interests recently cried for relief from fecal pollution problems, the EPA promptly provided \$1 million to a local county for a pollution identification and correction program.

Unfortunately, the granting of funds did not include conditions that required the program to be consistent with water quality standards. After funds were turned over to the county, a governor-led inquiry into the process revealed that even the most basic of pollution controls, such as keeping cows out of streams, were not implemented.⁶¹ Despite the EPA funding, a recent downgrading of 4,000 acres of shellfish beds occurred in this area, impairing treaty-reserved rights and prompting the governor to declare the overall effort a “failure.”⁶²

Federal approval of coastal protection plans has been unlawfully delayed for 17 years.

The Coastal Zone Act Reauthorization Amendments (CZARA), a component of the Coastal Zone Management Act, requires coastal states to develop and implement nonpoint pollution control programs that “restore and protect coastal waters.”⁶³ To receive approval, a state program must meet both statutory and administrative criteria. If a state fails to submit an approvable program, up to 30 percent of coastal management assistance and 30 percent of the Clean Water Act nonpoint source pollution funding is to be withheld.

These programs were supposed to be developed by 1995, but 17 years later, the federal agencies have failed to approve the state’s program. Final approval was withheld because of numerous deficiencies in the state’s program, including a lack of communication between the involved agencies.⁶⁴

With ESA listing of salmon and orca, the need for coastal protection is now more pressing than ever. Nonetheless, NOAA and EPA continue their complacency with the state’s noncompliance, and have failed to rescind funding in accordance with the law. In Oregon, this institutional lethargy resulted in a recent lawsuit filed against NOAA and EPA to compel final agency action under the Administrative Procedure Act. The subsequent settlement ought to result in enforcement of TMDLs along the Oregon coast. Given the critical importance of protecting habitat, it is essential that leadership is exercised to ensure that basic federal obligations in Washington are met, and in a way that better protects salmon and treaty rights.

Leadership and oversight are needed to align salmon protection programs.

The tribes have worked hard to foster salmon recovery while other federally supported programs undermine this progress. Examples include:

- The federal government significantly invests in habitat enhancement, while federally supported programs such as the state Shoreline Management Act and Corps of Engineers permitting processes continue to degrade habitat.
- NMFS requires tribal harvest to foster salmon and orca recovery, while FEMA is allowed to administer its flood insurance program in a manner that results in continued degradation of salmon habitat and fewer orca.
- The federal government prepares to alter treaty harvest requirements because of orca prey needs, but continues a 17-year streak of not

pressuring the state to finalize its coastal nonpoint pollution plan – a key salmon and orca recovery component.

- Funding secured for conservation and environmental protections are handed out without basic conditions and assurances to require that those actions be consistent with recovery efforts.

Leadership and oversight of salmon recovery is critical to ensure that the myriad federal programs relied upon to implement salmon recovery are in fact working together to accomplish this fundamental goal. Federal leadership must be provided to synchronize actions and ensure protection of the tribes' treaty-reserved rights.

Afterword

This paper is an immediate request for action. Faced with waning salmon populations and declining habitat, the tribes fear for the loss of their cultures and treaty rights. For the tribes, fish and fishing are as essential to life as water and air.

Our requests are simple: Stop the disparate treatment of tribes. Start protecting our treaty rights. Provide leadership to ensure that this is done.

We ask you to act now, before it is too late for the salmon and the treaty Indian tribes in western Washington.

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¹ Puget Sound Chinook Salmon Recovery Plan at p. 354

² NFMS Northwest Region, Final Supplement to the Shared Strategy's Puget Sound Salmon Recovery Plan, November 17, 2006.

³ NMFS, Puget Sound Chinook Salmon Recovery Plan – 2011 Implementation Status Assessment Final Report, 2011, at p. 6.

⁴ Id at 20.

⁵ Id at 15

⁶ NMFS, Puget Sound Chinook Salmon Recovery Plan – 2011 Implementation Status Assessment Final Report, 2011, at 6.

⁷ Carman, Taylor, and Skowlund, 2010, Regulating Shoreline Armoring in Puget Sound, in Shipman, Dethier, Gelfenbaum, Fresh and Dinicola eds, 2010 Puget Sound Shorelines and the impacts of Armoring – proceedings of a state of the science workshop, May 2009: U.S. Geological Survey Scientific Investigations Report 2010-5254. P. 49-54.

⁸ SSHIAP analysis of Washington's 2008 Water Quality Assessment Data.

⁹ SSHIAP analysis of data sources: *NOAA-CCAP 2006; NWIFC 2005; NWIFC 2010; WADNR 2010* . Conservatively, riparian forest cover with less than 65% cover has been determined to be insufficient for anadromous salmon and corroborated. However, NOAA has indicated in guidance that 80% cover was properly functioning, and <70% as not functioning. See National Oceanic and Atmospheric Administration, Coastal Salmon Conservation: Working Guidance for Comprehensive Salmon Restoration Initiatives on the Pacific Coast. Washington, D.C., (1996).

¹⁰ Puget Sound Partnership, State of the Sound Report, Ecosystem Status and Trends at pp 80-82 (2009).

¹¹ Further information about Hood canal D.O. is available at <http://www.hoodcanal.washington.edu/>

¹² Further information is available in the annual monitoring report: http://www.dnr.wa.gov/ResearchScience/Topics/AquaticHabitats/Pages/aqr_nrsh_eelgrass_monitoring.aspx

¹³ The following datasets were used to generate the Impervious Surface analysis and forecast for the Puget Sound region: Washington State Department of Natural Resources (DNR) Watershed Administrative Unit (WAU); NOAA CCAP. Coastal Change Analysis Project: Washington State Impervious Surface Polygons 1986 and 2006. NOAA Coastal Services Center. Charleston, S.C.; WA OFM. 2007. Projections of the Total Resident Population for the Growth Management Act (2000 to 2030, Low to High) Washington State Office of Financial Management. Olympia, WA; WA OFM. 2010. April 1 Population Determinations Official Change from April 1, 2000 to April 1, 2010. Washington State Office of Financial Management. Olympia, WA. WA OFM. 2011. WA OFM web site search to determine 1986 population by county. Using ArcGIS Desktop 9.3.1 Zonal Mean

function, the mean impervious surface value was calculated for each WAU draining to Puget Sound for both the 1986 and 2006 years. The 1986 and 2006 population totals were calculated for the counties containing the WAUs. The 2026 low, medium and high population estimates were also totaled for the same counties. Change values were calculated for population (2006-1986 & 2026 forecast - 2006) and impervious surface (2006-1986). A ratio analysis was performed comparing the change in population to the change in impervious surface to forecast the 2026 impervious surface change. The regional percentage increase in impervious surface was calculated for each WAU to generate the final thematic map using OFM's "High" 2026 county population estimate. The impervious surface categories are based upon the analysis by Tyson Waldo in the 2010/2011 Tulalip State of the Watershed report.

¹⁴ SSHIAP, State of Our Watersheds Report - Principle Findings, 2011, p. 1.

¹⁵ Id at p. 1

¹⁶ Haas, A and Collins B., A Historical Analysis of Habitat Alterations in the Snohomish River Valley, Washington since the Mid-19th Century: Implications for Chinook and Coho Salmon. Report Funded by the Tulalip Tribes with some additional funding from Snohomish County, 2001.

¹⁷ SSHIAP, State of Our Watersheds Report - Principle Findings, 2011, p. 3.

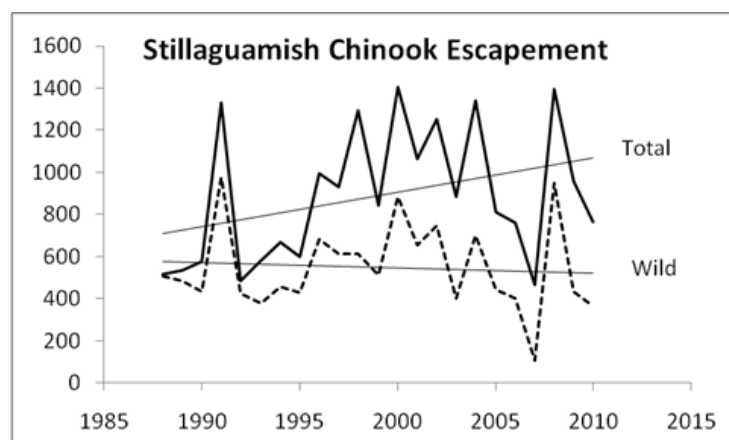
¹⁸ Id. at p. 4.

¹⁹ Id at 5.

²⁰ The Boldt decision was largely affirmed by the United States Supreme Court in *Washington V. Fishing Vessel Assn.*, 443 U.S. 658 (1979)

²¹ Harvest Rates and Graphs in this section are based upon the following: NWIFC, Analysis of Harvest Data from Tribal Online Catch Accounting System (TOCAS), 2011

²² Despite dramatic reduction in the harvest rate of Stillaguamish Chinook, which has resulted in an increasing trend in the total number of spawners (escapement), the number of wild fish returning has not increased. Wild productivity is constrained by degraded habitat.



²³ To the extent that conservation-based restrictions on treaty fisheries are necessary, these are governed by the conservation necessity principles established in federal case law and reflected in Secretarial Order 3206.

²⁴ See *National Wildlife Federation v. NMFS*, 524 F.3d 917, 931 (9th Cir. 2008) (amended opinion) where the court held that NMFS read the species recovery requirement out of the ESA.

²⁵ See NMFS, Supplemental Comprehensive Analysis (May 5, 2008) at 7-5.

²⁶ See NMFS, Proposed Evaluation and Determination on Chinook Plan (12/14/10) (E&D) at 38-39.

²⁷ *Id.* at 69.

²⁸ See NMFS, Puget Sound Chinook Salmon Recovery Plan – 2011 Implementation Status Assessment Final Report, 2011, at 45 (Harvest plans have been implemented as anticipated. Harvest being managed to meet or exceed established thresholds); see *id.* at 43 (Habitat quality continuing to decline. Current habitat protection tools generally the same as those that failed to forestall ESA listing).

²⁹ See NMFS, ESA Section 7 Consultation Final Biological Opinion: Implementation of the National Flood Insurance Program in the State of Washington, Phase One Document – Puget Sound Region, NMFS Tracking No. 2006-00472) (September 22, 2008) at 3. See also *National Wildlife Federation v. FEMA*, 345 F. Supp. 2d 1151, 1163-65 (W.D. Wash. 2004).

³⁰ See NMFS, ESA Section 7 Consultation Final Biological Opinion: Implementation of the National Flood Insurance Program in the State of Washington, Phase One Document – Puget Sound Region, NMFS Tracking No. 2006-00472) (September 22, 2008) Appendix 4 at 222-223.

³¹ NMFS requires that harvest management contribute to recovery by assuring that sufficient escapement occurs to make optimal use of current habitat conditions. Further harvest constraint, to produce higher escapement, would not result in higher productivity beyond the capacity of habitat. In concluding this is sufficient constraint of harvest NMFS, has stated that rebuilding to higher abundance, en route to recovery goals, is contingent on alleviating the habitat constraints, but federal consultations on actions affecting habitat are failing to require that habitat conditions improve.

³² Public statements by NMFS staff at May 2, 2011 workshop instructing local governments how to comply with the RPA and flood insurance requirements. See also Letter from Dan Siemann, National Wildlife Federation, to Will Stelle, NMFS, and Ken Murphy, FEMA (May 17, 2011).

³³ As recently conceded by the Washington Department of Ecology: “Estimates of mitigation success vary, but local, regional, and national studies show that most mitigation projects fail to fully achieve their intended goals and are not effectively replacing lost or damaged resources, habitats, and functions. We are not even close to achieving the goal of no net loss for wetlands and other aquatic habitats.” See WDOE, Making Mitigation Work: Report of the Mitigation that Works Forum (December 2008) at 1. This report is available at: www.ecy.wa.gov/biblio/0806018.html

³⁴ FEMA’s Model Ordinance, and apparently NMFS’ interpretation of its RPA, allows local governments to decide (regardless of expertise): (a) whether a given piece of floodplain or riparian habitat retains any fish habitat functions (See FEMA Revised Model Ordinance at 46 (commentary)); (b) whether a proposed action may affect any of these habitat functions (*Id.* at 52, §7.7(d)); and (c) how those impacts should be mitigated (*Id.* at 52-53, §7.8).

³⁵ While it is not yet fully recognized in the land management realm, harvest managers have long understood that they have a duty to manage salmon as needed to perpetuate harvestable runs. *See e.g., Washington v. Washington State Commercial Passenger Fishing Vessel Ass’n*, 443 U.S. 658, 684 (1979).

³⁶ See NMFS, Puget Sound Chinook Salmon Recovery Plan – 2011 Implementation Status Assessment Final Report, 2011

³⁷ See NMFS, Recovery Plan for Southern Resident Killer Whales (Orca) (2008) at II-87-96.

³⁸ *See e.g.*, NMFS, ESA Section 7 Biological Opinion on the Effects of EPA Registration of Pesticides Containing Carbaryl, Carbofuran, and Methomyl (April 20, 2009) (finding that registration of such pesticides would result in both jeopardy and adverse habitat modification to Puget Sound Chinook); *see also* NMFS, DRAFT ESA Section 7 Biological Opinion on the Effects of EPA Registration of Pesticides Containing 2,4-D, Triclopyr BEE, Diuron, Linuron, Captan, and Chlorothalonil (May 2011 DRAFT) (finding that registration of pesticides containing 2,4-D jeopardizes Puget Sound Chinook and that adverse modification of habitat results from use of pesticides containing diuron, and chlorothalonil).

³⁹ The Departments of the Interior and Commerce have some familiarity with the conservation necessity principles. They are referenced in Principle 3 of Department of the Interior Secretarial Order 3206, American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act (June 5, 1997).

⁴⁰ Governors Salmon Recovery Office, State of Salmon in the Watersheds Report, 2010, at p. 20.

⁴¹ Based upon correspondence with Washington State’s CREP coordinator

⁴² Based upon correspondence with Department of Ecology’s nonpoint source pollution (CWA § 319) coordinator

⁴³ NMFS, Puget Sound Chinook Salmon Recovery Plan – 2011 Implementation Status Assessment Final Report, 2011, at 43.

⁴⁴ *Id.*

⁴⁵ Department of Ecology, *Managing Washington’s Coast, Washington’s Coastal Zone Management Program*, Publication 00-06-029, February 2001, at p. 98.

⁴⁶ *Biggers v. City of Bainbridge Island*, 162 Wash.2d 683 (2007).

⁴⁷ *Id.* at 698.

⁴⁸ National Oceanic and Atmospheric Administration - Ocean and Coastal Resource Management, Washington State Shoreline Master Program Guidelines Programmatic Biological Assessment, March 15, 2005. Page 7-12, emphasis added

⁴⁹ Letter From Steven W. Landino, Washington State Director for Habitat Conservation Division of the National Marine Fisheries Service to John King, Chief Coastal Programs Division NOAA Office of Ocean and Coastal Resource Management, re: Endangered Species Act Section 7 Informal Consultation and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for NOAA’s proposed approval of the Washington State Shoreline Master Program guidelines promulgated by the Washington State Department of Ecology, April 23, 2009.

⁵⁰ In Washington State Department of Ecology's response to comments on Coastal Zone Management Section 309 Program Assessment and Strategy 2011-2015, the agency stated the following: "The [shoreline master program] SMP process involves conducting a cumulative impact analysis to determine whether or not the SMP will result in no net loss of ecological functions...However, at this time there are no broad tools available to quantitatively measure cumulative impacts, and jurisdictions are responsible for developing their own analysis."

⁵¹ According to a recent meeting with the Corps in the Seattle district regarding renewal of nationwide permits

⁵² Toft, J.D., Cordell, J.R. Simenstad, C.A. and Stamatiou, L.A. 2007 fish distribution, abundance, and behavior along city shoreline types in Puget Sound: *North American Journal of Fisheries Management*, v. 27, p 465-480.

⁵³ On June 15, 2011, Darigold, Inc., pleaded guilty to dumping ammonia from its milk-processing plant into an adjacent creek, which resulted in the death of several ESA-listed Puget Sound chinook salmon. The corporation signed an agreement to pay a \$10,000 fine and to donate \$60,000 to a non-profit foundation to pay for habitat restoration work. In addition, the corporation committed to develop an environmental compliance plan to address risks at the half dozen plants it operates in five western states. EPA agents involved in the enforcement action noted that Darigold has a history of spills over the last decade in Washington streams. *Seattle Times*, Darigold Pleads Guilty to Federal Polluting Charges (June 16, 2011), http://seattletimes.nwsources.com/html/localnews/2015331678_darigold16m.html (accessed June 16, 2011).

⁵⁴ 65 Fed Reg 42472 (July 10, 2000) (NMFS Take Guidance).

⁵⁵ See Price, D., Quinn, T., and Barnard, J. Fish Passage Effectiveness of Recently Constructed Road Crossing Culverts in the Puget Sound Region of Washington State, *North American Journal of Fisheries Management* 30:1110–1125 (2010).

⁵⁶ See RCW 90.58.030(3)(e)(ii) (Shoreline Management Act exempts from regulation "construction of the normal protective bulkhead common to single family residences").

⁵⁷ See *Seattle Times* "Beaches Suffer as Walls Go Up" by Warren Cornwall and Justin Mayo (May 13, 2008) found at http://seattletimes.nwsources.com/html/localnews/2004409777_growth_shorelines15m1.html.

⁵⁸ See e.g. Washington State Department of Ecology, Stillaguamish River Watershed Temperature Total Maximum Daily Load Study, March 2004, Publication No. 04-03-010, at p. 71 *stating* that the load allocation for effective shade for all perennial streams in the Stillaguamish River watershed is the maximum potential effective shade that would occur from mature riparian vegetation.

⁵⁹ Washington State Department of Ecology, SFY 2012-2013 Water Quality Financial Assistance Guidelines, August 2010.

⁶⁰ See e.g. Lummi Nation letter to EPA, or Upper Skagit Tribe letter to Governor Gregoire.

⁶¹ Government Management Accountability & Performance regarding Puget Sound, April 06, 2011 8:30am available at

<http://www.tvw.org/media/mediaplayer.cfm?EvID=2011041010&CFID=4788631&CFTOKEN=15725173&bhcp=1>

⁶² *Id.*

⁶³ 16 USC § 1455b (a)(1)

⁶⁴ NOAA and EPA's Findings For The Washington Coastal Nonpoint Program