



Department of Community Development – David Lynam, Interim Director  
619 Division Street  
Port Orchard, WA 98366

## STAFF REPORT – 2024 Comprehensive Plan Periodic Update

**DATE:** October 22, 2024  
**TO:** Kitsap Board of County Commissioners  
**FROM:** Colin Poff, Long Range Planning Supervisor  
**SUBJECT:** 2024 Comprehensive Plan Periodic Update

### EXHIBITS:

- A: 2024 Comprehensive Plan
- B: 2024 Capital Facilities Plan (CFP)
- C: Draft Amendments to Development Regulations (Title 16, Title 17, and Title 18)
- D: Final Environmental Impact Statement, Dated August 30, 2024
- E: Planning Commission *Findings and Recommendations (with Appendix)*
- F: DEIS Comment and Response Matrix
- G: Public Comments Received on Draft Documents between 12/25/23 and 4/8/24
- H: Summary of Themes from Public Comments
- I: Public Comments Received on Draft Documents Between 8/30/24 and 10/28/24
- J: Reclassification Request Table

### OVERVIEW

Kitsap County is in the process of a periodic update to its Comprehensive Plan and associated Capital Facilities Plan, and amendments to development regulations in Title 16 (land division and development), Title 17 (Zoning), and Title 18 (Environment), per the Growth Management Act, due no later than December 31, 2024. This report is based on the draft documents as amended by the Kitsap County Planning in the Findings of Fact dated October 15, 2024.

### NOTICE

Notice of the Kitsap County Planning Commission’s public hearing was properly and timely published in the official County newspaper, the Kitsap Sun and on the Kitsap County

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Comprehensive Plan website: [Comprehensive Plan Update \(kitsap.gov\)](https://www.kitsap.gov/comprehensive-plan). Notices were also sent via electronic notification on same date to interested parties through the GovDelivery system.

Notice of the Kitsap County Board of Commissioner’s public hearing was properly and timely published in the official County newspaper, the Kitsap Sun and on the Kitsap County Comprehensive Plan website: [Comprehensive Plan Update \(kitsap.gov\)](https://www.kitsap.gov/comprehensive-plan). Notices were also sent via electronic notification on same date to interested parties through the GovDelivery system.

## **SEPA**

On November 8, 2022, Kitsap County issued public notice of a Determination of Significance (DS), as required by WAC 197-11- 360 and chapter 18.04 of Kitsap County Code. This initiated an Environmental Impact Statement (EIS) scoping comment period ending December 8, 2022.

On December 15, 2023, a Draft Environmental Impact Statement (DEIS) was issued which studied and compared the three preliminary alternatives. The DEIS is a programmatic analysis (rather than project-specific) and analyzed the alternative scenarios and aided in the preferred alternative decision-making process. A public comment period was held on the DEIS between December 15, 2023 and February 26, 2024. A comment and response matrix was created for DEIS comments, included as Exhibit F.

On August 30, 2024, the County issued a Final Environmental Impact Statement (FEIS) (Exhibit D). The FEIS included analysis of the selected preferred alternative.

Comments have been incorporated as necessary into the revised drafts. Programmatic SEPA process is not administratively appealable.

## **PUBLIC COMMENT**

Multiple public comment periods were held throughout the update process. Opportunities to comment included emailing the [compplan@kitsap.gov](mailto:compplan@kitsap.gov) email, using a comment form on the project webpage, commenting directly on interactive GIS Story maps, commenting at open house events, or mailing comments to DCD.

Between December 15, 2023, and April 11, 2024, a public comment period was held for the draft Comprehensive Plan, draft Capital Facilities Plan, and draft development regulations. Public comments received during this time are included as Exhibit G. A summary of themes of comments is included as Exhibit H.

Between August 30, 2024, and October 28, 2024, a public comment period was held for the final draft Comprehensive Plan, final draft Capital Facilities Plan, and final draft development regulations. Comments received during this time are included as Exhibit I.

## **PUBLIC OUTREACH/PARTICIPATION**

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Public participation is an essential, and required, component for updating the Comprehensive Plan and development regulations. The list below outlines the public participation events that occurred.

- **Open Houses and Workshops:** The County held a series of virtual and in-person open houses and workshops throughout the update process. The virtual meetings either covered individual topics or the Comprehensive Plan holistically and included a presentation followed by break-out rooms, where participants could ask questions of staff. In person open houses were held in the Commissioner Chambers at 619 Division Street and provided presentations as well as numerous poster boards and maps where attendees could engage with staff. Feedback was summarized and documented on the project website.
- **Community Consultations and Stakeholder Engagement.** Between 2022 and 2024, staff convened various meetings or outreach with stakeholder groups to describe and gain input on the Plan update. The groups included but were not limited to the Cities (Bainbridge Island, Bremerton, Port Orchard and Poulsbo), the development industry (Kitsap Builders Association, Department of Community Development Advisory Group), Kitsap County Association of Realtors, Silverdale Seniors, Kitsap Economic Development Alliance, Keyport Community Group, Kitsap Transit, Kitsap Environmental Coalition, Kitsap ERACE, Council for Human Rights, Kitsap Health Collaborative, Save Enetai, and Students at Olympic College.
- **Events.** Kitsap County attended various events to engage people on the comprehensive plan update, such as Discover Kingston, Kitsap Home and Garden Show, Silverdale at Sunset, Pride Festival and the Manchester Open House.
- **Community Advisory Council (CAC) meetings.** Throughout the update process, the County provided updates and presentations to the Manchester Community Advisory Council (MCAC), Central Kitsap Community Council (CKCC), Suquamish Community Advisory Council (SCAC) and Kingston Community Advisory Council (KCAC)
- **Tribal Coordination Meetings.** Throughout the Comprehensive Plan update process, County staff held regular bi-weekly coordination meetings with Tribal staff from Tribal governments with usual and accustomed areas within Kitsap County (Suquamish, Port Gamble S’Klallam, Skokomish, Squaxin Island, Puyallup).
- **Internal Review Team.** To ensure internal consistency, the County convened an Internal Review Team comprised of various departments and service providers within the County, including but not limited to, Public Works, Kitsap Economic Development Alliance (KEDA) water and sewer providers, Public Health, Department of Emergency Management, and Parks. Some of these departments are heavily involved with implementation of various elements of the Comprehensive Plan, for example, KEDA for the Economic Development Chapter, Housing and Human Services for the Housing Chapter, and Public Works for the Transportation Chapter. This group met at key milestones in the update process and provided feedback and edits on draft documents.
- **Public Noticing.** Meetings, events, and public comment periods were noticed through the electronic GovDelivery system, sent to key agencies and interested parties through the “constant contact” system, posted on the project webpage, and in some cases posted using social media. Proper noticing procedures were followed for all public hearings and release of

the draft and final environmental impact statement, such as posting in the Kitsap Sun Newspaper, or sending to the Ecology SEPA register.

- **Postcards.** In March of 2024, a postcard was sent to households within an urban growth area or with 800 feet of an urban growth area, informing about the Plan update process and directing individuals to the Plan webpage. Approximately 30,000 postcards were sent.
- **Project webpage.** Kitsap County created a dedicated webpage for the Comprehensive Plan update: [Comprehensive Plan Update \(kitsap.gov\)](https://www.kitsap.gov/comprehensive-plan-update). The webpage provided an opportunity for the public to stay current with emerging issues and events related to the Plan update, as well as provide comments, sign up for notifications, and review all draft documents and maps related to the update.
- **Planning Commission Briefings and Work Sessions.** The Planning Commission conducted regular information sharing and work study sessions throughout the Plan update process. All sessions were open to the public. These briefings and work sessions were held during major milestones of the project, and general occurred in relationship to (1) initial project kick off, scoping, and direction, (2) review of the preliminary alternatives, draft code, and selection of a preferred alternative, and (3) review of final draft documents and adoption.
- **Board of Commissioners Briefings and Work Sessions.** The Board of County Commissioners conducted regular information sharing and work study sessions throughout the Plan update process. All sessions were open to the public. These briefings and work sessions were held during major milestones of the project, and general occurred in relationship to (1) initial project kick off, scoping, and direction, (2) review of the preliminary alternatives, draft code, and selection of a preferred alternative, and (3) review of final draft documents and adoption.

## BACKGROUND

Kitsap County is performing a periodic update of its Comprehensive Plan and associated development regulations as required by the Washington State Growth Management Act (GMA). Counties and cities within Washington are on scheduled update cycles, with Kitsap County part of the 2024 cadre.

Most recent periodic updates of the Comprehensive Plan occurred in 2016, 2012, and 2006. The Comprehensive Plan has also undergone limited amendments on an annual basis.

The Washington Department of Commerce (Commerce) does not have approval authority over the Comprehensive Plan but does review for consistency with the Growth Management Act and ensures that jurisdictions remain in compliance by meeting the legislatively appointed deadlines for updates. A Notice of Intent (NOI) to Adopt was provided to Commerce on September 10, 2024.

The Growth Management Act requires Kitsap County to review urban growth areas (UGAs) to accommodate urban growth projected for population and employment for the 20-year planning period, which extends through the year 2044. Urban Growth Areas must be properly sized, and the

County should coordinate with neighboring cities regarding possible future annexation of UGAs. On January 23, 2023, Kitsap County adopted growth targets for population and housing through the year 2044, consistent with Countywide Planning Policies. In addition to population and employment, the Growth Management Act also requires Kitsap County to establish and accommodate housing targets 20-year planning period, which extends through the year 2044. These housing targets must be established for different income bands. On March 11, 2024, Kitsap County adopted housing targets through the year 2044.

The following documents are being considered for adoption under this ordinance:

1. **Comprehensive Plan.** The Comprehensive Plan Update is a “repeal and replace” of the existing Plan and includes Chapters (or “elements”) of Land Use, Economic Development, Environment, Housing, Transportation, Parks Recreation and Open Space, and Capital Facilities and Utilities. A new chapter was also created for Climate Change. Further, the Plan includes subarea plans and neighborhood plans for Silverdale, Silverdale Regional Center, Kingston, Suquamish, Manchester, Gorst, Illahee and Keyport.
2. **Capital Facilities Plan.** The Capital Facilities Plan (CFP) includes information from the County and various service providers for needed improvements to roads, utilities, parks, and services, such as schools, and fire, necessary to accommodate growth.
3. **Development Regulations.** The County prepared draft development regulations to Title 16 (land division and development), Title 17 (Zoning) and Title 18 (Environment) that implement the Comprehensive Plan. Draft amendments relate to various topics, including but not limited to:
  - a. Parking standards (Title 17)
  - b. Dimensional standards including allowed densities, heights, and lot size (Title 17)
  - c. Changes to development standards for Accessory Dwelling Units (Title 17)
  - d. Performance Based Developments (Title 17)
  - e. New Tree Canopy Standards (Title 17)
  - f. Boundary Line Adjustment Criteria (Title 16)
  - g. New C-PACER Ordinance (Title 18)
  - h. Other miscellaneous code edits (Title 16 and Title 17)

**The following are the Growth Management Act directives for this update:**

1. RCW 36.70A.130 (5) directs Kitsap County to “take action to review, and if needed, revise their comprehensive plans and development regulations” by December 31, 2024. Kitsap County last periodic update to the Comprehensive Plan was completed in 2016.
2. The GMA, RCW 36.70A.130, mandates that Kitsap County’s Comprehensive Plan (Plan) and corresponding development regulations, including the Zoning Code and Map, be subject to continuing review and evaluation.

3. The GMA also requires Kitsap County to review urban growth areas (UGAs) per RCW 36.70A.130(3). UGAs must be able to accommodate urban growth projected for population, housing, and employment for the 20-year planning period, which extends through the year 2044.

## PROCEDURE

1. **Project Kickoff.** In Fall of 2022, The Board of County Commissioners approved the Comp Plan Update Scope of Work, Schedule and Public Participation Plan.
2. **EIS scoping.** On November 8, 2022, Kitsap County issued public notice of a Determination of Significance (DS) under the State Environmental Policy Act (SEPA). The notice also requested comments on the scoping of the Environmental Impact Statement (EIS), with comments due by December 8, 2022. Six comments were received during the scoping period.
3. **Land Use Requests.** Kitsap County accepted requests for land use reclassifications. The application was open to anyone who wished to apply. The submission period lasted between June and August of 2022. Information about the land use request process is summarized in the findings section of this staff report.
4. **Preliminary Alternatives.** Using reclassification requests, major policy initiatives, and key regulatory changes, the County developed three preliminary alternatives (Alternative 1: No Action, Alternative 2: Focused Growth and Alternative 3: Dispersed Growth). These alternatives were developed following public meetings, workshops, and other outreach.
5. **DEIS Issued.** On December 15, 2023, a Draft Environmental Impact Statement (DEIS) was issued which studied and compared the three preliminary alternatives. A Notice of Availability was posted in the Kitsap Sun newspaper, sent to the SEPA Register, and properly noticed to agencies, tribes and interested parties. A public comment period was held on the DEIS between December 15, 2023 and February 26, 2024.
6. **Public Comment Period.** Following proper noticing, a public comment period was held for the draft Comprehensive Plan, draft Capital Facilities Plan, and Draft Development Regulations between December 15, 2023 and April 8, 2024.
7. **Planning Commission Public Hearing.** On March 8, 2024, following timely and effective notice, the Planning Commission held a public hearing to consider the preliminary alternatives.
8. **Planning Commission Preferred Alternative.** On March 26, 2024, Planning Commission deliberated and made a recommendation on a Preferred Alternative to the Board of County Commissioners.
9. **Board of Commissioners Public Hearing.** On April 8, 2024, following timely and effective notice, the Board of County Commissioners held a public hearing to consider the preliminary alternatives.

10. **Board of Commissioners Preferred Alternative.** On April 24, 2024, the Board of County Commissioners deliberated and provided direction on a single preferred alternative.
11. **FEIS issued.** On August 30, 2024, the County issued a Final Environmental Impact Statement (FEIS). A Notice of Availability was posted in the Kitsap Sun newspaper, sent to the SEPA Register, and properly noticed to agencies, tribes and interested parties.
12. **Department of Commerce Review.** On September 10, 2024, the County issued a 60-day Notice of Intent to adopt to the Department of Commerce. A Commerce letter of acknowledgement of receipt was received on September 10, 2024.
13. **Final Public Comment period.** Following proper noticing, a public comment period was held for the final draft Comprehensive Plan, final draft Capital Facilities Plan, and final draft development regulations between August 30, 2024 through October 28, 2024. Comments received by September 24 were forwarded to the Planning Commission in advance of deliberations.
14. **Planning Commission Public Hearing.** On September 24, 2024, following timely and effective notice, the Planning Commission held a public hearing to consider the final draft Comprehensive Plan, Capital Facilities Plan and Development Regulations.
15. **Planning Commission Deliberations.** On October 1, 2024, the Planning Commission deliberated on final recommended draft Comprehensive Plan, Capital Facilities Plan and Development Regulations.
16. **Board of Commissioners Public Hearing.** On October 18, 2024, public notice was provided of the Board of County Commissioners Hearing on the Comprehensive Plan, Capital Facilities Plan, and Development Regulations. In addition to the draft documents, the Board was provided with this Staff Report and a Comment Matrix of those comments on the Final Draft Documents to date.
17. **Board of Commissioners Deliberation.** Deliberations are scheduled to be held on November 4, November 13, and November 18 of 2024.
18. **Adoption.** The Board will consider adoption on December 2, 2024.

## FINDINGS

Based on public participation, the Washington State Growth Management Act, The Puget Sound Regional Council's VISION 2050 and Regional Growth Strategy, the Kitsap Countywide Planning Policies, staff finds the following related to the 2024 Comprehensive Plan update.

### **Comprehensive Plan and Zoning Map reclassification requests.**

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1. The updated Plan conforms to the guiding directives established by the Board approved project work plan and public participation plan.
2. The updated Plan includes significant efforts to increase housing diversity especially for residents making less than 80% of annual median income (AMI).
3. The amended Plan Map includes adequate UGA boundaries with capacity necessary to accommodate employment and population targets and represents a net increase of 575 acres of UGA compared to existing conditions.
4. The updated Plan establishes a foundation and strategies moving forward to address climate change in natural systems, the build environment and transportation systems.
5. The updated Plan focuses growth within Centers including the Silverdale Regional Center, Kingston Countywide Center, and McWilliams/303 Countywide Center.
6. Limited additional revisions to Plan text and land use map amendments during the Planning Commission process are justified in response to public input provided during the process.
7. All final revisions are within the scope of alternatives considered by the Planning Commission, are in response to public testimony, or are consistent with the department's recommendation.
8. **Reclassification requests** were solicited, reviewed, and assessed as part of the Comprehensive Plan update. In the Preferred Alternative and draft documents, the requests were either included, excluded, or deferred to a future process. Specific information on each request can be found in the 2024 Reclassification Request Table in Exhibit J. Kitsap County received 86 reclassification requests. The application period for such requests lasted between June and August of 2022.

a. **Preliminary Alternatives.** The initial review of reclassification requests was assessed for consistency with the Growth Management Act (GMA) and legal precedent. Requests found consistent were then included in one of two action alternatives Compact Growth (Alternative 2) or Dispersed Growth (Alternative 3) for environmental review. The purpose of the different preliminary alternatives was to study and compare different future land use maps and policies. Requests inconsistent with GMA or legal precedent did not receive analysis in the Draft Environmental Impact Statement (DEIS). After public testimony and review by the Planning Commission, the Board of Commissioners directed staff on the list of requests to be further considered in the DEIS. Requests may have been excluded from the preliminary alternatives generally based on, but was not limited to:

- i. Requested an urban zone in a rural area not contiguous with the Urban Growth Area.
- ii. Resulted in a single zoned parcel surrounded by potentially incompatible zoning; known as a "spot zone."
- iii. Requested a zoning category that does not exist or cannot be accommodated under state statutes such as new one-acre lots in rural areas.
- iv. May significantly increase rural residential capacity.
- v. Added density in rural areas encumbered by critical areas.
- vi. Not eligible under state requirements such as expansions to Type I LAMIRDS.



b. **Preferred Alternative.** After completion of the DEIS and draft Capital Facilities Plan, 12 requests were included in the Preferred Alternative and 18 were directed to be deferred to a future planning process. After public and Planning Commission review, the Board of Commissioners directed which requests would be included in the Preferred Alternative.

- i. The requests included in the Preferred Alternative were generally found to 1) support increased housing density and diversity to meet Kitsap County’s housing goals, 2) expand employment opportunities in or near residential areas to improve walkability/bikeability and access to transit, 3) be located within existing urban growth area (UGA) boundaries, 4) support logical and efficient provision of urban services, 5) be located near existing industrial areas appropriate for additional industrial capacity and/or 6) be supported by a local city for a change in their associated UGA.
- ii. The requests excluded from the Preferred Alternative or deferred to a future planning process were generally found to 1) expand rural development potential, 2) lack integration of proposed commercial uses with residential areas, 3) lack support from urban service providers, such as a city, 4) expand a UGA boundary into sensitive rural areas, 5) expand a UGA boundary to accommodate additional low-density urban residential zoning in conflict with expected housing needs, and/or 6) propose zoning that could conflict with surrounding uses.

**Development Regulations.**

1. Kitsap County’s development regulations have been reviewed for consistency with the updated Comprehensive Plan and proposed revisions to Title 16 (Land Division and Development), Title 17 (Zoning) and Title 18 (Environment) were included. These changes are generally related to implementation of the Comprehensive Plan and other clarifying edits.
2. These revisions to County Code generally focused on one of the following efforts:
  - a. Increased opportunities for single, family attached and multi-family housing in urban areas through revised density, height, setback, parking, procedural and other requirements.
  - b. Improves environmental conditions through tree canopy requirements and incentives for green building in multi-family and commercial construction.
  - c. Maximizes development opportunities in regional and countywide centers such as Silverdale, Kingston, and McWilliams to concentrate growth,
  - d. Improved clarity and consistency with and between County Codes.

**Capital Facilities Plan.**

1. The purpose of the Capital Facilities Plan is to meet GMA requirements of identifying capital improvements and associated funding that support the County’s land use plan and growth targets for the period 2024-2044. The proposed Plan has been amended to be consistent with the updated Comprehensive Plan for 2024-2044.
2. The Plan was developed in collaboration with service providers countywide including the Cities, water purveyors, sewer, school, fire and parks districts, Kitsap Public Health District and Kitsap

Transit. This data combined with County service responsibilities was assessed based on the growth projections for 2024-2044.

3. The Planning Commission deliberated on the amended Capital Facilities Plan. The Planning Commission voted to approve the amended Plan, with minor revisions to reflect current City of Bremerton sewer data, and estimated grant funding amounts for 2030-2044 County transportation projects, as indicated in the October 15, 2024, Planning Commission Findings of Fact, Conclusions and Recommendations. The Board of County Commissioners hereby adopts the findings of the Planning Commission regarding the Capital Facilities Plan.
4. The amended Capital Facilities Plan is consistent with Kitsap County-wide Planning Policies, and complies with the requirements of the GMA, specifically RCW 36.70A.120 and RCW 36.70A.070.

## **RECOMMENDATION**

The Department of Community Development recommends approval of the Comprehensive Plan, Land Use Map, Capital Facilities Plan, and draft development regulations in Title 16 (Land Division and Development), Title 17 (Zoning), and Title 18 (Environment) as presented in the drafts dated August 30 (Exhibit A, Exhibit B, and Exhibit C), and as revised per Planning Commission *Findings and Recommendations* (Exhibit E).

## EXHIBITS A - J

### **Exhibit A: 2024 Comprehensive Plan**

[https://www.kitsapgov.com/dcd/PEP%20Documents/20240830%20Draft%20Comp%20Plan%20with%20Appendices\\_compress.pdf](https://www.kitsapgov.com/dcd/PEP%20Documents/20240830%20Draft%20Comp%20Plan%20with%20Appendices_compress.pdf)

### **Exhibit B: 2024 Capital Facilities Plan (CFP)**

[https://www.kitsapgov.com/dcd/PEP%20Documents/20240830%20Draft%20CFP%20with%20Appendix\\_compress.pdf](https://www.kitsapgov.com/dcd/PEP%20Documents/20240830%20Draft%20CFP%20with%20Appendix_compress.pdf)

### **Exhibit C: Draft Amendments to Development Regulations (Title 16, Title 17, and Title 18)**

TITLE 16: <https://www.kitsapgov.com/dcd/PEP%20Documents/Title%2016%20-%20Land%20Divisions%20-%20Changes%20Combined.pdf>

TITLE 17: <https://www.kitsapgov.com/dcd/PEP%20Documents/Title%2017%20-%20Zoning%20-%20Code%20Changes%20Combined.pdf>

TITLE 18: <https://www.kitsapgov.com/dcd/PEP%20Documents/Title%2018%20-%20Environment%20-%20Draft%20C-PACER%20Ordinance.pdf>

### **Exhibit D: Final Environmental Impact Statement, Dated August 30, 2024**

[https://www.kitsapgov.com/dcd/PEP%20Documents/20240830%20Final%20EIS%20with%20Appendices\\_compress%20%281%29.pdf](https://www.kitsapgov.com/dcd/PEP%20Documents/20240830%20Final%20EIS%20with%20Appendices_compress%20%281%29.pdf)

### **Exhibit E: Planning Commission *Findings and Recommendations (with Appendix)***

<https://www.kitsap.gov/dcd/PEP%20Documents/Comp%20Plan%20PC%20FoF%20SIGNED%20101524%20%28002%29.pdf>

### **Exhibit F: DEIS Comment and Response Matrix**

[https://www.kitsap.gov/dcd/PEP%20Documents/20240506\\_DEIS\\_Comment\\_Response\\_Matrix.pdf](https://www.kitsap.gov/dcd/PEP%20Documents/20240506_DEIS_Comment_Response_Matrix.pdf)

### **Exhibit G: Public Comments received on Draft Documents between 12/25/23 and 4/8/24**

[https://www.kitsap.gov/dcd/PEP%20Documents/20240416\\_Comp\\_Plan\\_Comment\\_Matrix.pdf](https://www.kitsap.gov/dcd/PEP%20Documents/20240416_Comp_Plan_Comment_Matrix.pdf)

### **Exhibit H: Summary of themes from public comments**

[https://www.kitsap.gov/dcd/PEP%20Documents/20240416\\_Comp\\_Plan\\_Comment\\_Themes\\_Responses\\_CP%20additions.pdf](https://www.kitsap.gov/dcd/PEP%20Documents/20240416_Comp_Plan_Comment_Themes_Responses_CP%20additions.pdf)

**Exhibit I: Public comments received on Final Draft Documents between 8/30/24 and 10/28/24**

<https://www.kitsap.gov/dcd/PEP%20Documents/20241022%20Combined%20Comments%20on%20Comp%20Plan%20Final%20Draft%20Documents%20Through%20October%2021%2c%202024.pdf>

**Exhibit J: Reclassification Request Table**

<https://www.kitsap.gov/dcd/PEP%20Documents/20241022%20Reclassification%20Table.pdf>