

## DEIS Public Comment Response Matrix

*Additional Responses Provided on 9/19/24 to Kitsap Environmental Coalition DEIS Comments*

#	Author Name	Comment, Letter, or Letter Title	Response
527	KECB	The Kitsap Environmental Coalition Board sends these concerns about the Draft EIS report to you so that you can be aware of what several KEC members have been working on over past 2 months. Attached also are our specific comments, which are also being submitted to Mr. Diener as the Responsible Official. Our comments focus on Alternative 2 since this is the Alternative that is most closely aligned with the direction given to the County through PSRC and Legislative guidance. However, providing for the opportunity to “mix and match” alternatives makes it difficult to assess the impact of what is finally decided on as the “preferred alternative”, without any additional opportunity to comment on those impacts. We have noted specific impacts when possible in our comments, but the “preferred alternative” may require an additional opportunity for comment.	Thank you for your comments. The Preferred Alternative is very similar to Alternative 2. The FEIS published on August 30, 2024 describes the impacts of the Preferred Alternative that was selected by the Board of County Commissioners in April 2024.
528	KECB	The Draft EIS for Kitsap County’s Comprehensive Plan and the draft plan itself makes it hard to do any analysis of the accuracy of the growth estimates on which it is based. There are estimates of the growth targets for certain areas, based on those adopted by KRCC. But these appear to be aspirational, since the population for Kitsap County has been growing over the past three years at about 1% a year, while the plan estimates increases of almost 3% for certain UGAs. This is unlikely, for a number of reasons, including reduced household size, aging population, and problems with ferry service, and health care, as well as other issues. The Draft plan in that case does not need to accommodate that estimated growth through expanded UGAs and zoning changes. This is an important consideration since throughout the document they propose UGA expansions although they are not necessary to accommodate even those ambitious population estimates, and these result in increased environmental impacts such as allowing building in critical areas. The impacts of these assumptions also carry over in the need for greater investment in mass transit and other non-motorized options although the availability of funding for these investments is far from assured.	The growth targets for Kitsap County are set through a countywide planning process in collaboration with the Puget Sound Regional Council and Pierce, Snohomish, King, and Kitsap counties. This means that decision makers for the County and all the cities within the county had opportunities to review and shape the allocation of growth within the county. All population growth forecasts are a moving target, and targets may well be revised down later in the planning period. However, the County, like all fully planning jurisdictions, is required to plan for projected growth (meaning, among other things, that it has sufficient land capacity to accommodate projected growth), which in this case is reflected in the growth targets adopted in the draft comprehensive plan and reflected in the DEIS and FEIS.
529	KECB	The County does not have, or show, a good baseline of the current conditions of the environment. Without a baseline, how do we know how bad conditions will get? Data are available to evaluate water, wastewater, wildlife, tree cover, solid waste, cars, etcetera. Yes, we may not know which square kilometer will be impacted the most and how, but we can say that several positive factors will decline and several negative factors will increase in the County as a whole. Furthermore, citizens are not asking for precision. Assume 10% increase in population and then 20% increase and make estimates for County-wide impacts. If the County will not start the conversation about current and future environmental impacts, they will not be able to measure future declines, or more hopefully, improvements. This needs to be coupled with effective monitoring to measure those changes.	Chapter 3 of the DEIS (and the FEIS) contains baseline data on all required sections of an EIS - earth, air quality/climate, water resources, plants and animals, land and shoreline use, relationship to plans and policies, population, housing, and employment, historical and cultural preservation, aesthetics, transportation, noise, and a wide range of public services and utilities.
530	KECB	If the goal is truly to protect the environment, the County should strive not just to limit negative impacts but to work to actually improve the environment. The goal should be for Net Ecological Gain, rather than no net loss. The natural environment is dying by a thousand cuts, through the loss of trees, wildlife corridors, farmlands, degradation of parks, and diminished rural areas. This concept of NEG is not discussed in the DEIS but should be included.	The current state requirement is No Net Loss. Net Ecological Gain is being considered for future legislation that may require communities to account for continued degradation of environmental conditions, but at this point NEG is not required, and without guidance through legislation and state agency rules, Kitsap County is focused on fulfilling current requirements in its CAO.
531	KECB	In many areas the DEIS and the Comprehensive Plan are too vague on the actions that need to be taken, sometimes relying on plans (e.g. WRIA 15) that have not been adopted or implemented, or are not adequate to mitigate future actions. For example, the Critical Areas Ordinance is called out numerous times as a key mitigation measure, however that ordinance is currently under review. It will only be as effective as the strength of its final requirements. If it has too many opportunities for variances and waivers, this mitigation measure will be weak and useless. Rather than vaguely describing the direction the County plans to take, the EIS and Plan should spell out specifically what the County has to do. In certain cases this will require some hard decisions on what is allowed; to apply the rules and regulations without the use of variances.	Noted. With regard to WRIA 15, while the plan may not yet be formally adopted, the actions and measures and analysis recommended in the WRIA plan can be pursued by the County. The FEIS, for example, discusses groundwater base flow analysis that the County should pursue and which is described in WRIA 15. The Critical Area Ordinance was still under development at the time of the DEIS publication. The revised draft of the proposed update underwent a public hearing on August 26. The Preferred Alternative reflects revised buffers for critical areas as part of the revised CAO. With regard to variances, you and other commenters have described dissatisfaction with the variance process as used in Kitsap County and your comments are noted.
532	KECB	Climate change should have a section of its own, perhaps at the front, to call attention both to the impacts of climate change, as well as the actions needed by the County to address them. More detail should be provided on sea level rise, increased storm intensities and health impacts from climate change. For example, although sea levels are expected to rise over a foot in the next 25 years, there are no proposed regulations governing the development of shoreline property.	The FEIS (and DEIS before it) analyze environmental impacts in the outline as prescribed in WAC 197-11-444. Aspects like sea level rise, storm intensity, and health impacts are not expected to vary substantially between alternatives, so they were not analyzed as part of this EIS. Regulations governing the use and development of shoreline property are contained in Kitsap County’s Shoreline Master Program, which was updated in 2021 and is updated every 10 years per state statute.

533	KECB	Neither the draft EIS nor the draft Comprehensive Plan address or evaluate the so-called “Framework” for the Port Gamble Forest Heritage Park as required under GMA, and as the County said would be done. The park plan is a proposed revision to the Comprehensive Plan, so the environmental impacts of the park needs to be included in this EIS. It is insufficient to vaguely say it is incorporated by “reference”, especially since significant environmental impacts are neither described nor addressed. The EIS and plan must acknowledge and address the significant issues and weaknesses remaining/imbedded in this proposed park plan. Further, all environmental impacts of the park plan are required to be expressly identified, studied, and analyzed in this EIS. If impacts caused by the park plan will be identified and analyzed under SEPA in the future then it should be clearly stated that the park plan (the “Framework”) will not be adopted nor projects in it funded or completed until that happens. If the County does not evaluate all environmental impacts of the park plan in the Final EIS, then it will be opening itself to potential legal challenges regarding the scope and adequacy of the County’s SEPA review.	Thank you for your comment. The Port Gamble Framework is a reference document, not being adopted by reference into the comprehensive plan. It is also not an ordinance, nor a subarea plan. All future decisions related to the Port Gamble Forest Heritage Park will have to go through environmental review as appropriate. Also please note that the Preferred Alternative does not include any rural rezones, deferring that to a future planning process.
534	KECB	In conclusion, we hope to someday view an EIS that actually deals with real impacts to the environments of Kitsap County. If X impacts are happening in 2023-2024, predict how X will change. And precisely how finances and actions will differ from the past to accomplish that change. Don’t simply state that one alternative is better than another in 4 ways and worse in 7 ways. And that more impacts can be avoided (even though they haven’t been avoided in the past). Residents now know the environmental impacts that resulted from the 2016 Comp Plan. Give us a clear vision of the future not a blurry one.	Thank you for your comment. The nature of a nonproject EIS at the county level limits us to looking at the large-scale impacts of what would occur over 20 years of planning for additional growth and development. The Comp Plan provides a vision for the future, and the EIS simply documents the expected environmental impacts of the adoption of the comp plan over the planning period. We lack the ability to be specific about many aspects of environmental impact, but the FEIS describes environmental impact as specifically as possible.
535	KECB	Please provide a link to view the comment letters received during the scoping period.	The County can provide these documents directly by request.
536	KECB	Phased review – Please explain this idea of a phased review in more detail. What exactly would be incorporated “by reference” and what would warrant a “narrower” or specific review?	As a non-project planning proposal, the different alternatives broadly anticipate adverse impacts and cumulative impacts. Specific uses are not analyzed in this use as the EIS analyzes all potential uses in a given area/zone and potential impacts that could occur. However, subsequent SEPA analysis will still be needed for project-specific proposals that exceed SEPA Categorical exemptions. This is also covered in WAC 197-11-776.
537	KECB	Alternatives – Allowing a mix of Alternatives 2 and 3 can be problematic. You can’t have “your cake and eat it” - pursue both Compact Growth and Dispersed Growth. You should strengthen Alt 2, but not by allowing more dispersal.	While it is a correct observation that compact growth and dispersed growth are not compatible concepts, there are a multitude of factors that differentiate the alternatives that were used to create a preferred alternative that closely resembles Alternative 2 but with a couple key ingredients from Alternative 3. Most notably, increased buffers and tree protection were included in Alternative 3 because a draft CAO and tree ordinance was not available at the time of scoping, so this was used as a way of conceptually differentiating the alternatives from each other to draw out meaningful comparisons. The Preferred Alternative maintains the narrow UGA expansions and heavy emphasis on infill, increased densities, and zoning changes from Alternative 2 but adds the increased buffers and tree canopy retention and replacement code changes envisioned in Alternative 3. Some UGA expansions that were considered in Alternative 2 were <i>not</i> included in the preferred alternative, meaning aspects of Alternative 1 “no change” were mixed with the preferred. Additionally, the one major land use change in the Preferred Alternative that was not covered in Alternative 2 is an expansion of the Puget Sound Industrial Center - Bremerton, which adds a great deal of employment capacity and gets the preferred closer to Alternative 3 and than Alternative 2 when employment capacity is considered.
538	KECB	Water Resources – Water quality and quantity needs to be more fully addressed, including establishing baseline measures for both. Several aspects of water resources were not addressed including impacts on “fish bearing” streams and the impact on small and intermittent streams and wetlands which are currently not regulated at any level (these are not regulated by the ACOE). These are critical habitats for a number of flora and fauna species. This is one area where Alt 3’s wider buffer requirements is preferable to Alt 2.	Additional detail on the extent of fish bearing streams that would be impacted by development in the alternatives was added to the FEIS. Impacts on small and intermittent wetlands that are not currently regulated at any level are not able to be analyzed in this nonproject FEIS because the vast majority are not mapped, but please note that expanded buffers are included in the Preferred Alternative as a result of the development of the CAO update during the EIS development and revision process.

539	KECB	Summary of Impacts1. – Population, Housing and Employment. As discussed above, the estimated population does not align with actual experienced population, nor is there a good rationale for why that will change, unless the County actually encourages growth through incentives. In fact, Alternative 2 actually exceeds the population growth targets provided to the County by PSRC. The County’s rationale for this is that it is necessary to meet the distribution of housing, i.e. to create more affordable housing options. But if the need is for a different mix of housing, it seems it is possible to do that without expanding the UGAs with associated adverse impacts. Up zoning within the UGA could be done with fewer adverse impacts, and might better meet the objective of denser, more accessible developments for a changing population. The County could also provide incentives by making it easier to develop in these existing urban areas through simplifying and streamlining the permit process, waiving permit costs and consultation fees for such developments, or providing density bonuses. There does not seem to be any need to expand the existing UGAs.	UGA expansions in Alternative 2 (and the Preferred Alternative) are those necessary to accommodate growth in those specific UGAs. Part of the exercise undertaken by the County is projecting and accommodating growth within its UGAs. Additionally, some UGA expansions are needed to accommodate employment growth, not just population. Upzoning and changes to development regulations to incentivize infill and densification within existing UGAs are plentiful within Alternative 2 and the Preferred Alternative. The County must plan for (have capacity for and provide services to) projected population and employment growth, a projection that is adopted through the countywide planning policies (CPPs) process and which must be consistent with PSRC’s Regional Growth Strategy and VISION 2050.
540	KECB	Each alternative results in similar levels of transportation impact. In total, the number of vehicle miles traveled (VMT) is expected to increase between 72 and 78 percent during the PM peak hour between now and 2044. (No mention of the chemicals from tires and from vehicle exhaust flowing into natural areas and our water at levels 78% more than at present.) However PSRC traffic demand modeling assumes VMT reductions based on the RTP model (Cascadia Aug 2022).” Thus, the data show increasing per capita miles driven, but their mathematical model predicts fewer miles driven in the future given unknown assumptions and unknown (optimistic?) effort and financing by the County and State. A good but pessimistic model would likely show increases in VMT due to increases in both people and per capita miles driven. Later in the Transportation Section the LOS for each state roadway is shown to be barely adequate now.	The Preferred Alternative actually has greater VMT growth than any of the preliminary alternatives due to particularities of where employment and housing growth was added. Modeling assumptions are consistent with the RTP model, and the project list developed as part of the proposed growth in the preferred alternative helps keep roadways below the level of service standard.
541	KECB	If the population is increasing, especially if we want to develop greater density, there will be an even greater need for parks and natural areas. The need for people to have access to nature is well documented, and natural parks are an increasing refuge for the protection of native plants and animals. Therefore an important “mitigation” should include the expansion of natural parks. Funding for this effort might include creation of a parks district. On the other hand, the EIS fails to describe the contamination flowing in terms of water pollution, air pollution, noise, illegal movement of motorized bikes into parks from new adjacent subdivisions.	The comp plan revisions include numerous policies and strategies that support more parks and natural areas, including funding strategies. This nonproject EIS is not scoped to examine specific impacts to specific parks from proposed subdivision - this would occur in a project SEPA checklist or EIS as part of a development proposal. The County is exploring a metropolitan park district for maintenance and operation of new, existing and expanded parks.
542	KECB	The sections pertaining to Solid Waste in this EIS fail to address the increasing amount of litter on roads and public properties. The simplest prediction is that litter will increase and illegal dumping will increase at the same rate as population growth. Illegal dumping is common in County Parks according to reports by citizens and park stewards. If the garbage dumped includes chemicals or biological waste, they are significant threats to humans, wildlife, and nature. According to the Department of Ecology’s 2022 litter pickup summary, ( <a href="https://ecology.wa.gov/Waste-Toxics/Solid-waste-litter/Litter/Litterpickup">https://ecology.wa.gov/Waste-Toxics/Solid-waste-litter/Litter/Litterpickup</a> ). In the March 13, 2023, issue of the Kitsap Sun, the Department of Ecology reported that 413,697 pounds of trash were collected along state highways in Kitsap County. Litter is increasing in the State. Kitsap led the whole group in the number of “dump sites” — more than even King County. The effort to clean it all up dramatically increased with more than 10,000 hours of work in Kitsap County recorded by paid workers and volunteers. However, only half the miles of road were cleared in 2022 compared to the recent past.	Consideration of illegal dumping is included in the solid waste capital facilities plan. If there is an outsized increase in the future, that will need to be accounted for in the solid waste budgeting process.
543	KECB	The current wastewater treatment facilities fail to stop unpermitted dumping of sewage into the bays and Sound every year. Why does the County believe that the future will be better? If the future is not better, then the statement above about absolutely no adverse impacts is wrong. And they are avoidable with better stormwater systems, but unavoidable under current conditions. We recommend stronger BMPs for Water Quality improvement as necessary for the future of Kitsap’s stream and nearshore health.	The County has a robust stormwater code that is updated regularly. The County is also updating its sewer plan and conveyance infrastructure, and actively improves its sewer pipes and pump systems.
544	KECB	Table states no change to stream buffers for Alt 2 and no tree retention. What is the rationale for these decisions, especially since Alt 3 does include tree retention and an expanded stream buffer to 100 feet? Wouldn’t this requirement be just as needed for Alt 2? County will consider other changes including “increase SEPA flexible thresholds for residential development in all UGAs.” What does this mean? An explanation is needed.	Because the critical areas ordinance was in its early stages during the scoping of the alternatives for the EIS, and no tree canopy code had been drafted yet, this was done in order to differentiate the alternatives from each other and from baseline. However, the Preferred Alternative reflects both the expanded buffers as proposed under the revised CAO draft and tree canopy protections as directed by the Board of County Commissioners. SEPA flexible thresholds are a tool for local governments to choose where is an acceptable threshold for small development projects of various types to be exempt from SEPA review within a range as allowed by the state.
545	KECB	UGA size changes of alternatives. Over 460 acres increased for Alt 2, although not needed to accommodate population. Why? As discussed earlier, there does not seem to be any need to increase the UGAs. Not only is it unnecessary, but it will result in allowing developments in areas of higher risk with greater environmental impacts.	UGA expansions in Alternative 2 (and the Preferred Alternative) are those necessary to accommodate growth in those specific UGAs. Part of the exercise undertaken by the County is projecting and accommodating growth within its UGAs. Additionally, some UGA expansions are needed to accommodate employment growth, not just population.

546	KECB	Earth Impacts – under Alt 2 an additional 94 acres of high geologic hazard areas would be included in expanded UGAs. However, later it states that that “Reducing UGA expansions in Moderate and High Geologic Hazard areas would reduce the potential number of persons or structures exposed to risk of damage due to geologic hazards.” These statements are inconsistent and, as discussed earlier, we don’t believe it is necessary to expand UGAs.	These statements are consistent because in comparing Alternative 2, in which UGA expansions are limited to only those necessary to relieve growth pressure in specific locations in specific UGAs and most growth is accommodated through infill and densification within existing urban areas, and Alternative 3, Alternative 2 has limited expansions in moderate and high geologic hazard areas. Additionally, the latter statement is included among "other potential mitigation measures" as something the county COULD consider.
547	KECB	Significant Unavoidable Adverse Impacts They state that “trees can minimize this unavoidable impact”, but earlier they stated that there were no proposed tree protections under Alt 2. In talking about Greenhouse Gas (GHG) emissions, they also state that tree loss is responsible for ~15% of the increase. Seems like the County should include tree protections in all the alternatives including Alt 2.	As mentioned previously, the DEIS assigned tree protection to Alt 3 as a way of differentiating the alternatives from each other. The Board of County Commissioners directed the County to develop tree canopy retention and replacement standards in code. Additionally, the revised CAO with its increased buffers provides for tree protections relative to Alt 1 (no action) as well as Alt 2, which did not include increased buffers.
548	KECB	Water Resources – Affected Environment. There is no discussion of the impact of rising sea levels due to climate change and how this should impact development regulations of shoreline property. It is estimated that sea levels will rise over a foot by 2050. The County has done its own study (Kitsap County Climate Assessment Study 2020) that summarizes the projected effects, yet it does not appear that is impacting how these areas can be developed. East Coast states like Florida and Georgia have required homeowners to implement significant changes to mitigate these effects including raising building heights, but there is no evidence of that happening in Kitsap. This is irresponsible, both to the taxpayer and the property owner.	There is a separate planning effort underway with regard to sea level rise in Kitsap County. This was not examined as part of the FEIS because sea level rise and some other climate change impacts were not expected to vary depending on alternative. The Climate Change element in the comp plan will provide policy support for regulatory and programmatic efforts to mitigate and adapt to sea level rise.
549	KECB	Silverdale Subarea – As noted in the draft, two-thirds of the area is in a Category I or II CARA. According to data supplied by Silverdale Water District, the level of Island Lake has not reached the outflow from the lake into Barker Creek since February 2021. Since Island Lake is the headwaters to Barker Creek, no water being supplied at the headwaters means reduced water flow downstream which several fish species including salmon and cutthroat trout call home at various times of the year. As climate change continues, one can expect this trend to continue. Development next to Barker Creek and Island Lake will only make this situation worse. In addition, there are wetlands associated with Barker Creek that will suffer from development of the property. The rural area proposed for rezoning are the largest remaining mostly undeveloped tract that contributes to groundwater recharge of the Island Lake Aquifer which supplies drinking water for the residents of Central Valley, Ridgetop, and much of Silverdale. The loss of this vital resource to development will have a severe impact on aquifer recharge and possible contamination of the groundwater. Island Lake itself has been in peril as evidenced by the fact that tens of millions of gallons of water must be pumped into the lake each summer (since 1992) to maintain an acceptable water level.	While substantial development is expected in the Silverdale UGA in the Preferred Alternative, there are no rural rezones proposed as part of the Preferred Alternative. Additionally, there are no UGA expansions in the area of Barker Creek and Island Lake as part of the Preferred Alternative.
550	KECB	Water Resources – Impacts In February, 2023, Dr. David Onstad studied all 14 watersheds for Kitsap Peninsula plus 1 for Bainbridge Island found on the web site <a href="https://www.epa.gov/waterdata/how-my-waterway">https://www.epa.gov/waterdata/how-my-waterway</a> for water quality information (recorded in 2018). The database contains information about inland water bodies (streams and lakes) and coastal sites. Several easy conclusions can be drawn. First, some rivers and streams have not been evaluated. Thus, their conditions are unknown. Second, of the 15 facilities with discharge permits, such as sewage treatment plants (STP) and wastewater treatment plants (WWTP), only 1 had no current violation identified in the database. The Naval facilities are included in this database. Third, all inland waterbodies are either impaired or have unknown quality. Fourth, of the 348 coastal sites along the edges of the Peninsula and Bainbridge Island, 107 are impaired (31%), 34 are rated good(10%), and the rest have unknown quality. The ratio of impaired to good is 3:1. If we omit the unknowns, 76% of tested sites along the coast are impaired. Impaired inland waterbodies include Square Lake in CCHP and Coulter Creek at the SW border of CCHP. Others include Long Lake and Kitsap Lake. Note that possibly the best evaluated watershed is the Big Beef Creek watershed near Seabeck on the western side of the Peninsula. All inland waterbodies for that watershed in the database are impaired except for 2 unknowns. The Kitsap Public Health District monitors County lakes and streams for bacteria hazardous to humans. In its last two reports (2022-2023), the KPHD reported that the number of streams with high bacteria levels increased 50% from 16 in 2022 to 24 in 2023. For 17 lakes, the KPHD reported that 12-18% of the lakes had too much bacteria. Hazardous level advisories were posted for 21 days in 2022 and 127 days in 2023. The EIS does not explain how the County plans to improve the quality of these lakes and streams. Will the number of impaired coastal sites increase as population increases?	With no major changes to rural zoning, land use intensities or allowed uses in the Preferred Alternative, the proposal does create many new significant adverse impacts in rural areas and watersheds required to be examined in the FEIS. However, the Plan documents and current County programs highlight numerous strategies to address water quality as it impacts our shoreline and inland water bodies. Kitsap has multiple programs to acquire and restore key watersheds and is working closely with the Washington State Departments of Fish and Wildlife and Natural Resources (large rural land owners) to preserve land and tree stands in our rural areas including Seabeck and Big Beef. The Plan promotes the close coordination with the Kitsap Public Health District's (KPHD) regulatory programs that address failing septic systems (Pollution Identification and Control program (PIC)). Additionally, the KPHD and the County provide education and outreach on land use activities such as use of fertilizers and other nutrient sources that lead to discharges to water bodies increasing the possibility of bacteria and nutrients creating water quality issues in lakes and ponds. In urban areas, many of the impairments may be caused by from historic development patterns under previous codes. The documents include support for regional stormwater improvements to address discharges from historic development and improvements to the water quality discharged from our sewage treatment plants (many also reflected in our CFP). New development promoted by the documents require construction under the current stormwater and critical areas regulations that are designed under best available science and best management practices to avoid harmful discharges. Lastly, the documents promote watershed assessments to direct future county acquisitions, regulations and incentives. The information provided in this comment will be a helpful component to these future efforts.

551	KECB	The Kitsap County Coordinated Water System Plan (CWSP) Regional Supplement 2005 Revision (May 9, 2005) presents an assessment of municipal and industrial water supply needs in Kitsap County and a program to effectively provide water supply and service to customers throughout the area. Exhibit (figure) 9-1 in the CWSP report shows a prediction made in 2004 that estimates water demand out to 2030. An extrapolation of that line out to 2044 has the demand exceeding water rights for all of Group A systems by 2035-2044 depending on assumptions. Furthermore, the predicted demand also approaches the water rights for all systems by the 2040s. Doesn't the County have a newer prediction? Doesn't the prediction depend on assumptions of infiltration in the future and climate change? There should be alternative curves on the chart based on alternative assumptions about the future. KPUD could make this a stochastic model and produce confidence intervals around projections. Also, the draft does not clearly state where the water will be extracted from to supply high-density communities. Are they outside of the County? How will increased groundwater extraction influence surrounding flows of groundwater needed to support streams in the dry season?	While the County does not provide water, it does work closely with purveyors for approval of their individual water system plans to ensure consistency with growth projections and the Comprehensive Plan. The individual water system plans become part of the coordinated water system plan. Water rights and water supply is under the purview of Department of Ecology who works closely with the County. There are projected adequate water rights for the planning period.
552	KECB	Plants & Animals This review of impacts on plant and animal communities does not address large and small mammals that live specifically in forested habitat, amphibians that live in wetlands and have migration patterns, native plants that are replaced by clearing and grading. In the specific case of amphibians, migration patterns need to be considered and also silt fences that block those pathways need to be discouraged. Vague descriptions of animals without specificity makes the EIS review very weak in this area; it needs more specificity. The EIS needs to add the adverse impact on all wildlife by natural areas' proximity to housing areas, causing more wildlife interactions that can result in animal deaths. Displaced wildlife such as bear and cougar wander into neighboring yards and end up being killed for human safety. This happened with a cougar incident in Kitsap in 2023.	Thank you for your comments. Information on many of these species come from individual case studies, incidents, and sitings and so do not lend themselves to being summarized and generalized in a county-wide document where apples-to-apples data sources are important to be able to be generalized to the whole county and large geographic regions. However, it is true that there is no empty habitat, and that displaced wildlife generally moves into habitat that is likely already occupied to capacity. Best available science around no net loss and net ecological gain is coming around to improving the performance of critical areas code over time, but the information in the EIS is the best available at the scale needed at this time.
553	KECB	This section also does not mention the bog plants found in at least one bog in North Kitsap – Carpenter Lake Bog. Please add mention of this and other bog/fen environments in the plants and wetland sections of this document. These are important and rare in our region and occur only because of unique surface water conditions that should be taken into account when land is considered for development. In addition, a rare plant, Hypericum majus, has been identified at Coulter Creek Heritage Park.	Carpenter Lake has been added to the reservoirs and lakes inventory. Additionally, northern bog clubmoss has been added to the sensitive, threatened, or endangered plan species list in the FEIS.
554	KECB	The map from WDFW ranking the condition of freshwater habitat (Exhibit 3.1.4 1-1) shows that Port Gamble ranks as high quality despite the comment that most intact habitats occur in the south county.	Noted.
555	KECB	Exhibit 3.1.4 1-2 Known Occurrences of rare plants in Kitsap County – this table states that their habitats are wetlands and riparian areas, making these areas even more valuable for protection. Later Exhibit 3.3.4.2-1 Target LOS analysis for natural resource areas – shows a significant deficit that just increases over the planning period.	Noted. The proposed revisions to the CAO would provide increased protection for wetlands and riparian areas accordingly.
556	KECB	3.2 Land Use – The Plan needs to protect farmland in Kitsap County. This needs to be added to the land use section. Protection of local farmland helps climate resilience, habitat, and local food production. Protection of farmland is paramount to a healthy community.	Noted. The final draft of the comp plan update contains goal and policy support for farmland. The County intends to look more closely at agricultural and rural issues and policy in 2025.
557	KECB	3.2.1.3 Kitsap Environmental Coalition supports the recommendation by Washington Department of Fish and Wildlife to use Riparian Management Zones (RMZs) as a replacement for the standard stream buffer widths currently used in the Kitsap County Critical Areas Ordinances. Riparian Management Zones look at several factors that play a part in the health of these ecosystems. Salmon need cooler water temperatures to thrive and survive and the shade of trees is essential for this function. Woody debris aids in regulating the velocity of the streams and helps trap sediment. Trees and other plants in the zone stabilize the bank and the riparian zone acts as a filter to greatly reduce pollution excess nutrients from fertilizers, pesticides, herbicides or other harmful chemicals from nearby roadway use. These Riparian Management Zone buffer widths are based upon the height of the dominant trees in the area which in Kitsap County is most likely Douglas fir. The Washington Department of Wildlife has created an online map tool to indicate these heights using data on how tall they would be if 200-years old. In those areas of Washington with few or no trees along a stream bank the buffers would be as low as 100-feet to protect streams from pollution. For an in depth examination of riparian management zones, please refer to Riparian Ecosystems, Volume 1 as it goes into great detail about these complex systems. Two other Washington state governments have implemented critical areas ordinances based upon riparian management zones. The City of Anacortes implemented RMZ-based buffers in 2021 while Clark County implemented a hybrid of standard buffer widths and those based upon riparian management zones.	Noted. The proposed revisions to the CAO would provide increased protection for wetlands and riparian areas accordingly. The recommendations for the proposed changes to the CAO were developed in close coordination with the County and with WDFW.
558	KECB	3.2.2.1 Rural Character - The Rural Wooded Zone is becoming less and less in this area. In addition, many rezone requests are also for the conversion of Rural Protection (1 DU/10 Ac) to Rural Residential. This decrease in larger rural lots will have a significant effect on the variety of rural densities. The variety is an important aspect of the rural character in Kitsap County. Otherwise, it seems the county may end up as Rural Residential only. Take measures to protect the large rural lots and the existing character that makes Kitsap the place people love. Rural rezones should be denied, and the County's rural development expectation should be in the single percentage range. A measure to support decreased rural growth would be to remove the Rural Residential Zone. Rural development for single family homes requires the use of an on-site septic (OSS), which usually fail at some point. This environmental impact needs to be addressed and mitigated.	Thank you for your comment. All proposed rural rezones were deliberately removed from the FEIS with the intent of deferring these requests through a separate planning process to take place in 2025 and beyond if needed. The County's land use decisions in the draft comp plan/EIS are aimed at accommodating projected population in urban areas as part of its compliance with PSRC's Regional Growth Strategy.

559	KECB	3.2.6.1 Transportation - Affected Environment (pdf 276) Sound to Olympics STO Trail (pdf 308) The STO trail presents several issues that must be addressed by this EIS. First, the original STO alignments reviewed for SEPA DNS (for the String of Pearls and Non-Motorized plans) has changed greatly. About 90% of the reviewed alignments in the Poulsbo, Port Gamble, and Kingston area have been abandoned. Therefore, the earlier DNS determinations are inapplicable and a new SEPA evaluation is required. Second, significant and unmitigatable adverse environmental impacts have been unacknowledged. The most recent example is an alignment through a Natural Area designated in North Kitsap Heritage Park. The construction would destroy important habitat that is an undeveloped, critical, and relatively large wildlife refugia and wildlife corridor adjacent to a large wetland and salmon stream complex. Bear, cougar, deer, bobcat, coyote, and beaver are among known species. No on-site mitigation is possible. There is no equivalent area available off-site anywhere in north Kitsap. Third, because "significant adverse environmental impact for which mitigation cannot be easily identified" exists, a Determination of Significance must be issued and an EIS process started. Because alignments are connected and one section must begin where another ends, the project must be evaluated in total--phasing is not appropriate.	If planning for the STO Trail has been revised significantly, there would need to be a new SEPA determination and environmental checklist or impact statement for a project proposal. This is outside the scope of this nonproject EIS.
560	KECB	Built Environment Public Services and Utilities – There is no mention of Health Services in this section. The Kitsap County Health Department declared a health emergency in Kitsap due to high health care costs and inadequate access to services. Although overall health services are not a function of County government, the crisis situation in our County’s health services heavily impacts public services, including fire services. A health services section needs to be added addressing the impact of higher population with an already strained crisis health system.	A health services section is not included in the EIS because this is not one of the public services that must be analyzed as part of an EIS and, as you note, health services are not a function of County government. However, levels of service for fire, police, and EMS services can be revised from time to time if high health care costs and inadequate access to services is in fact increasing response times and service beyond what can be adequately addressed by existing LOS.
561	KECB	Parks & Recreation (pdf 375) There are unresolved difficulties with the SEPA and GMA status of Heritage Parks. These parks have "land use policy plans" that bring them under the jurisdiction of the GMA. The plans have various names and purposes, including forestry plans, resource management plans, master plans, Framework, etc. Some have been approved by the Board of Commissioners, others not. None of these plans, separately or collectively, have been addressed within the context of the GMA. It is our understanding that all of these park land use policy plans must be evaluated under the GMA. The SEPA status of some heritage parks also overlaps with planning of the Sound to Olympic trail (comment §3.2.6.1). Where Parks and Public Works planning and projects overlap geographically, all relevant plans must be evaluated for SEPA in concert.	Not all planning within County parks reach the level of separate land use actions. Many maintenance, operations and management activities are already considered with the zoning of the lands as Park. Many uses consisrede normal operation of parks and open space uses are highlighted in the Title 17 Zoning Use table and shown as permitted. These can include trail maintenance, forest management, interpretive signage and other parks improvements. Their planning level impacts are captured in the adoption documents establishing the zone for the property and its related SEPA review. Depending on the scope of the effort, additional project level detail may be required through separate SEPA determinations, but such detail is not required at the Comprehensive Plan level. As for the Port Gamble Forest Heritage Park Framework, the county is interested in enhancements to this document particularly in the areas of wildlife habitat and environmental protection. These efforts are strategies in the revise draft Comprehensive Plan to be conducted in advance of any new major projects being developed.
562	KECB	3.3.4.2 Parks & Recreation - Impacts (pdf 378) 3.3.4.3 Parks & Recreation - Mitigation Measures Applicable Regulations & Commitments Kitsap County policy must incorporate current WDFW and Ecology recommendations for the use of Riparian Management Zones and appropriately amend the Critical reas Ordinance. Kitsap County must incorporate current Ecology recommendations for wetland buffers, specifically the Critical Areas Code be amended to ensure the integrity of buffers as undisturbed, well vegetated areas. Other Potential Mitigation Measures Mitigation for Heritage Parks and other large county areas must include monitoring programs of wildlife and habitat health. Results can be used to modify management plans and projects, thus avoiding and minimizing adverse environmental impacts. Environmental impacts of the Sound to Olympic trail must be properly addressed and addressed within the context of the PROS Plan and individual park forestry, resource management, master or other plans. (ref. comment on §3.2.6.1)	Regarding RMZs, the proposed revisions to the CAO (hearing held on August 26) would provide increased protection for riparian areas developed in concert with the County and with WDFW. Regarding mitigation for heritage parks and other large county areas, thank you for your comment, this will be considered as an additional potential mitigation measure for parks and recreation.
563	KECB	3.3.4.3 Establish a policy standard to protect and restore wildlife habitat and natural ecological functions. Establish monitoring programs to identify the success of restoration efforts.	Thank you for your suggestion. The County will consider this for potential inclusion in mitigation measures for parks and recreation impacts.
564	KECB	3.3.4.4 - Significant Unavoidable Adverse Impacts (pdf 382) EIS must add additional information. The Parks, Recreation and Open Space Plan for Heritage Parks specifies protection of wildlife and habitat as important park policies, which provide multiple environmental and quality of life benefits. Wildlife and habitat management is an important and critical aspect for these parks. So-called "unavoidable impacts" can be avoided by proper planning, which includes resource assessments and subsequent landscape classifications prior to specifying development plans (PROS Plan Appendix 5). These elements must be augmented with monitoring programs of wildlife and habitat health. Results can be used to modify management plans and projects, thus avoiding and minimizing adverse environmental impacts.	Thank you for your suggestions. The County will consider these suggestions as potential inclusions in mitigation measures for parks and recreation impacts.
565	KECB	3.3.4.23-212 Heritage Parks. Shows that County can meet the LOS for this metric assuming “consideration of concepts within the Port Gamble Heritage Park Framework completed in December 2022”. This is the only clear reference to PGHP. Since that Framework is not correct and needs changes, this reference is both insufficient and inaccurate as noted in the summary comments. Additional environmental assessment is needed in regards toinal:	While the Port Gamble Forest Heritage Park Framework contains significant detail to many of the comments listed and are adequate for planning level assessment, the county is interested in enhancements particularly in the areas of wildlife habitat and environmental protection. These efforts are strategies in the revised draft

1. Identification of legal encumbrances and easements;
2. Identification of all existing physical features (including pipelines, wells, specialized recreation areas, etc.)
3. Identification of potential environmental hazards (water system);
4. Policies for conservation, preservation, and/or restoration of critical natural resources;
5. Lack of resource assessments including wetlands and buffers, streams and riparian management zones, wildlife habitat, and wildlife corridors;
6. Amendments to landscape classifications as necessitated by resource assessments;
7. Trail location procedures and lack of compliance with the Critical Areas Ordinance;
8. Level of usage in terms of carrying capacity;

Comprehensive Plan to be conducted in advance of any new major projects being developed.