



POINT NO POINT TREATY COUNCIL

Port Gamble S'Klallam * Jamestown S'Klallam

December 8, 2015

David Greetham
Kitsap County Department of Community Development
Comprehensive Plan Update, Planning and Environmental Programs Division, DCD,
MS-36, 614 Division Street, Port Orchard, 98366

RE: Kitsap County Comprehensive Plan First Draft

Dear David Greetham,

Thank you for including the Point No Point Treaty Council (PNPTC) in your email distribution lists and giving us the opportunity to provide comments to the first draft of the Kitsap County Comprehensive Plan update, draft supplemental Environmental Impact Statement, and associated documents. The PNPTC provides natural resources management services to our member tribes—the Jamestown S'Klallam and the Port Gamble S'Klallam. Both tribes have an important stake in the protection of the marine and freshwater shorelines in Kitsap County, as our fisheries and shellfisheries depend on healthy, productive watersheds and nearshore environments. We are also very concerned about the development pressure within the county and how these changes will affect the natural resources therein. We appreciate the opportunity to provide more comments on various components as they are covered in more detail throughout this Comprehensive Plan update process. Also, thank you for providing us with 24 hours additional time due to my untimely illness (email from David Greetham, December 7, 2015).

On behalf of the Point No Point Treaty Council, we are submitting general comments to Kitsap County's draft documents. In the Draft SEIS, the Point No Point Treaty Council supports Kitsap County's Alternative 2 proposal, which directs the 20-year growth targets into compact UGA boundaries emphasizing mixed uses and higher densities in center and corridors, provided that some outstanding issues are addressed. Our member tribes support Alternative 2 over Alternative 3, particularly because Alternative 2 results in a 4% net reduction of UGA lands, while generally protecting the rural character of areas outside of the UGA boundaries. However, without specific detail on the development regulations for Alternative 2, we are unable to identify if the current draft SDEIS will be sufficient. We do not support Alternative 3.

Below are some general comments that we think should be addressed, updated or augmented in the final drafts of the proposed documents:

- Protecting historic and cultural resources, including archaeological resources, should be better addressed in the County's comprehensive planning for the next 20 years. In exhibit 2.16-13, it appears that the county plans to amend this element, however details of this have not yet been clearly described in the document. For example, project applicants should be required to consult with the Tribes and cultural organizations as part of the County's permitting process.
- Development regulations have not yet been released and our Tribes would like to review how specific goals and policies will be implemented.
- The Capital facilities document needs to provide a better plan for sewer for residences that are relying on outdated septic systems. Revisions should also include increasing solid waste capacity, additional sewer services, more storm water drainage systems, expanding water supply systems and increasing transportation services.
- The Comprehensive plan needs to give more information about the Transfer of Development Rights program.
- A final review of all the draft Comprehensive Plan documents (draft Capital Facilities plan, draft Supplemental Environmental Impact Statement, Buildable Lands, and all associated documents) need to occur specifically looking at inconsistencies and linkages between each of the documents.
- A general question for these plans: Has the County reviewed local and updated Salmon Recovery planning documents? For example, there may be some priority areas for protection for species of protected under the Salmon Recovery plans or other species of local interest such as bear and cougar.
- The plan has been reformatted compared to previous plans, which has taken a tremendous amount of effort. We applaud Kitsap County for taking on such an important task. However, are policy laws going to be hyperlinked in the final .PDF document? As a reviewer, I found it challenging to find specific policy regulations as they are presented in the original policy documents and the links to different/associated documents that some of the documents referred to. Perhaps the County should include a policy matrix that provides those hyperlinks for ease of reference somewhere in the Kitsap Comprehensive Plan document.
- Climate Change has not been adequately addressed in these documents. While Climate Change is mentioned in several places for the goals and policies throughout the Comprehensive Plan Update, little evidence of how Climate Change Plans and preparation will be implemented, monitored and evaluated. Our Tribes are currently working very hard on their own reservations and Usual and Accustomed areas, to see how resources will be affected in lieu of climate change impacts, and it seems paramount that phenomenon such as rising sea levels, increasing flood events, changing temperature regimes such as higher incidence of drought (causing rivers to stay dry longer), and other elements need to be included to address local climate change impacts. Additionally, preparing for the effects on key elements such as storm water, waste water, emergency services, flooding and other vulnerable areas, needs to be addressed with a clear plan of action.

- Site specific re-zone requests: While we were not able to carefully review each of these requests, it is essential that a thorough investigation of all the affected resources is systematically reviewed to ensure that these re-zones do not fall on habitat areas that include species of concern, building in the FEMA 100 year flood plain, or are not contrary to the existing regulations under the current GMA, SMP and CAO regulations.

Again, thank you for considering PNPTC's comments on these draft documents. We look forward to reviewing the next versions of the Comprehensive Plan Update and its associated documents. If you have any questions regarding these comments, feel free to contact me at 360-297-6534 or at crossi@pnptc.org.

Sincerely,



Cynthia Rossi
Lead Habitat Biologist
Point No Point Treaty Council