

TO: Katrina Knutson

From: Mark Mauren, Chief Operating Officer Bremerton West Ridge

RE: Repose to Kitsap 2036 Staff report on Bremerton West Ridge Reclassification Request. Permit# 15-00522 Bremerton West Ridge

DATE: December 7, 2015

Thank you for the opportunity to respond to the County staff report for Bremerton West Ridge Reclassification Request (Permit# 15-00522 Bremerton West Ridge). I am pleased to provide additional information that should enable the staff report to better reflect our proposal and allow the County Planning Committee and Commissioners to base their decision on the best available information.

Overview

To better understand the proposal it might help if you know some of the history, current uses and future uses of the property as a whole (Bremerton West Ridge, LLC and Ueland Tree Farm, LLC).

- **Historically**, the 2,260+ acres (see Attachment 1) currently owned by Ueland Tree Farm and Bremerton West Ridge has been used as/for a:
 - Tree farm since statehood,
 - Aggregate extraction (Kitsap Quarry) since 1962,
 - Saw mill (Kitsap Quarry, Attachment 2),
 - Maintenance building, laydown yard and storage, vehicle and equipment (1960's - current),
 - Community water source (Kitsap Lake Water District (until 1994)
 - Non-motorized recreational uses.
- **Currently, the property is actively managed**
 - Timber production (FSC certified),
 - Aggregate extraction (over 20 million tons in permitted reserves over 5 sites),
 - Concrete and Asphalt recycling
 - Six rental homes (Lebers Lane),
 - Three commercial leases (Two buildings, storage for vehicles and equipment) located at Kitsap Quarry,

- Conservation easements (Chico and Dickerson creeks),
- Non-motorized recreational uses.
- Zoning
 - The majority of the 2,260 acres is zoned RW
 - 440 acres is located within the City of Bremerton and is zoned low residential,
 - 62 acres zoned URS (Kitsap Quarry)
 - 35 acres zoned City Watershed.
- **Future**
 - **Timber Management** - The majority of the property is managed under a FSC certified timber management plan. The plan provides approximately 1 million board feet of timber to local mills each year.
 - **Aggregate Extraction** - Aggregate reserves on UTF/BWR land will serve as one of the primary sources of aggregate in Kitsap County for the next 100 years. With that in mind this proposal is trying to:
 - Protect the existing aggregate sources and processing facility with an MRO designation.
 - Shift the primary flow of aggregate truck access to Werner Road and away from the Northlake Way residential area.
 - Shift aggregate-related facilities (Processing, concrete, soil, dumping, etc) away from residential areas (Northlake Way) and nearby forest land to Kitsap Quarry, which has been an industrial area for over 50 years and is directly adjacent to an existing major industrial complex (Werner road), inside the City of Bremerton city limits.
 - **Proposed RI designation** - With the proposed RI designation we plan to expand or develop the following uses that currently exist in Kitsap Quarry or are permitted under the UTF Mineral Resource CUP:
 - Aggregate processing and related office (Expand existing use),
 - Soil processing, including stump grinding (Develop, UTF Mineral Resource CUP) ,
 - Maintenance building, laydown yard and storage, vehicle and equipment (Expand existing use),
 - Concrete batch plant, (Develop, UTF Mineral Resource CUP),
 - Soil dump site (Expand existing use),
 - Concrete and Asphalt recycling (Expand existing use).
 - **Non-motorized recreation** - We hope to donate a trailhead and trail system to Kitsap County for non-motorized recreational use.
 - **Conservation** - We intend to continue to promote a conservation easement plan around critical wetland complexes and stream corridors

similar to the 100 acres we donated to the Mountaineers Foundation at the northern end of UTF/BWR holdings.

- **Development** – We intend to develop at least part of the 440 acres that is located within the Bremerton City Limits over the intermediate to long term.

We seek to be good stewards of the land by minimizing the impacts our management activities have on the public and environment. We feel we can accomplish this most effectively by concentrating a substantial part of the existing and permitted activities within the proposed RI area as well as property within the Bremerton City limits. For this to happen, it is important that the RI designation be added to the relevant parcels, as requested in our submission.

I also want to note that the County has already signed (Attachment 3) the SM6 form for the expansion of the mining operation into parcel 202401-3-002-2005.

Specific Comments on the Staff Report

1. Pg 1, 9 – 62 acres proposed RI and MRO and 80 acres RP with proposed MRO overlay.
2. Pg 6, 3 – **How the requested redesignation is in the public interest and the proposal is consistent with the Kitsap County Comp plan** – Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road (industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton. It is also important to note that the URS Designation states *"This zone may also apply to properties which are being considered for non-residential use."*
3. Pg 7 – Response to the Statement that *"The proposed RI designation is not required to support existing mining operations"* – The URS designation with a MRO designation does not allow for expansion or development of all the current uses within Kitsap Quarry or permitted uses under the UTF Mineral Resource CUP:
 - Aggregate processing and related office (Expand existing use),
 - Soil processing, including stump grinding (Develop, UTF Mineral Resource CUP),

- Maintenance building, laydown yard and storage, vehicle and equipment (Expand existing use),
- Concrete batch plant (Develop, UTF Mineral Resource CUP),
- Soil dump site (Expand existing use),
- Concrete and Asphalt recycling (Expand existing use)

However, the RI designation allows for all these uses and fits with the type of industrial uses that occur in the adjacent industrial land.

3A.2.1 Rural Lands – Goal 2. Second bullet – Please note that The Ueland Tree farm Mineral Resource Conditional Use Permit also allows for a concrete batch plant, soil process facility, office, maintenance facility and equipment storage area. Because of that we disagree with the statement that “*RI zoning would not be consistent with the surrounding area*”. Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that are within the City Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been originally designated URS because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road (Industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton. It is also important to note that the URS Designation states “*This zone may also apply to properties which are being considered for non-residential use.*”

Importantly, future citizens of Kitsap County will benefit greatly from having e access to the aggregate processed at Kitsap Quarry. This is a 100+ year source of aggregate. This aggregate processing facility represents the bulk of the permitted aggregate in Kitsap County. These permitted aggregate resources ensure that future citizens of Kitsap County have aggregate resources available close to the population center of Kitsap County, reducing costs, truck traffic and environmental issues that would occur if a significant amount of aggregate continues to be imported into Kitsap County.

4. **3B.1b Goal 13: Policy RL-51:** – See attachment 4 for map of DNR Reclamation Permit showing permit boundary (yellow) encompassing the mentioned parcels. In addition parcels 202401-2-012-2005 and 202401-2-011-2006 provide important access to Kitsap Quarry and the proposed RI parcels.

5. **3B.1b Goal 13: Policy RL-53** - Response to the Statement that “ *The proposed RI designation is not required to support existing mining operations*” – The URS designation with a MRO designation does not allow for expansion or development of all the current uses within Kitsap Quarry or permitted uses under the UTF Mineral Resource CUP:

- Aggregate processing and related office (Expand existing use),
- Soil processing including stump grinding (Develop, UTF Mineral Resource CUP) ,
- Maintenance building, laydown yard and storage, vehicle and equipment (Expand existing use),
- Concrete batch plant, (Develop, UTF Mineral Resource CUP),
- Soil dump site (Expand existing use),
- Concrete and Asphalt recycling (Expand existing use).

However, the RI designation would allow for all these uses and fits with the type of industrial uses that occur in the adjacent industrial land.

6. **3B.1b Goal 13: Policy RL-56** – See Attachment 5, a memo prepared by a licensed Geologist that states there is commercially viable gravel on parcel 202401-3-002-2005. Also see Attachment 3, which is SM6 for parcel 202401-3-002-2005, signed by Kitsap County approving the expansion of the mining operation to parcel 202401-3-002-2005.
7. **3B.1b Goal 13: Policy RL-58** – See Attachment 5, a memo prepared by a licensed Geologist that states there is commercially viable gravel on parcel 202401-3-002-2005. Also see Attachment 3, which is SM6 for parcel 202401-3-002-2005 signed by Kitsap County approving the expansion of the mining operation to parcel 202401-3-002-2005.
8. **3B.1b Goal 13: Policy RL-59** – See Attachment 5, a memo prepared by a licensed Geologist that states there is commercially viable gravel on parcel 202401-3-002-2005. Also see Attachment 3, which is SM6 for parcel 202401-3-002-2005 signed by Kitsap County approving the expansion of the mining operation to parcel 202401-3-002-2005.
9. **3B.1b Goal 15: Policy RL-63** – See Attachment 5, a memo prepared by a licensed Geologist that states there is commercially viable gravel on parcel 202401-3-002-2005. Also see Attachment 3 which is SM6 for parcel 202401-3-002-2005 signed by Kitsap County approving the expansion of the mining operation to parcel 202401-3-002-2005.
10. **Pg 10 - 3B.1b Goal 15: c.** - Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that

truck traffic is entering/leaving via Werner Road (an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton. It is also important to note that the URS Designation states "*This zone may also apply to properties which are being considered for non-residential use.*"

The comment "subject parcels have identified wetland" - It is important to note that the existing and proposed uses adhere to or exceed the regulatory requirement to protect wetlands. This was concern was addressed in the SEIS for the UTF CUP Modification that was recently approved by Kitsap County.

11. GMA Planning Goals (5) - Response to the Statement that "*The proposed RI designation is not required to support existing mining operations*" – The URS designation with a MRO designation does not allow for expansion or development of all the current uses within Kitsap Quarry or permitted uses under the UTF Mineral Resource CUP:

- Aggregate processing and related office (Expand existing use),
- Soil processing including stump grinding (Develop, UTF Mineral Resource CUP) ,
- Maintenance building, laydown yard and storage, vehicle and equipment (Expand existing use),
- Concrete batch plant, (Develop, UTF Mineral Resource CUP),
- Soil dump site (Expand existing use),
- Concrete and Asphalt recycling (Expand existing use).

However, the RI designation allows for all these uses and fits with the type of industrial uses that occur in the adjacent industrial land.

Response to the statement "*may lead to impacts to on site wetlands*" – This comment was addressed in the SEIS for the UTF CUP Modification that was recently approved by Kitsap County. Any proposed use will need to go through the SEPA process to determine their impacts and how/if they can be mitigated.

Response to statement "*That other significant mining operations*" - Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City limits of Bremerton. The industrial uses at Kitsap Quarry predated the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road

(an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton. It is also important to note that the URS Designation states "*This zone may also apply to properties which are being considered for non-residential use.*"

12. **GMA Planning Goals (8)** - The URS designation with a MRO designation does not allow for expansion or development of all the current uses within Kitsap Quarry or permitted uses under the UTF Mineral Resource CUP:

- Aggregate processing and related office (Expand existing use),
- Soil processing including stump grinding (Develop, UTF Mineral Resource CUP) ,
- Maintenance building, laydown yard and storage, vehicle and equipment (Expand existing use),
- Concrete batch plant (Develop, UTF Mineral Resource CUP),
- Soil dump site (Expand existing use),
- Concrete and Asphalt recycling (Expand existing use).

However, the RI designation allows for all these uses and fits with the type of industrial uses that occur in the adjacent industrial land.

13. **GMA Planning Goals D-1. B. Preserving rural character and enhancing the natural environment.** We respectfully disagree with the staff response that "the proposed RI designation may impact the character of the rural area". This site has been an active industrial area for over 50 year and will be for the next 100+ years. It is already part of the "Character" of this local area. As stated previously, Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road (an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton. It is also important to note that the URS Designation states "*This zone may also apply to properties which are being considered for non-residential use.*"

14. GMA Planning Goals D-2. Rural land uses and development patterns – c. -
Response to the Statement that “ *The proposed RI designation is not required to support existing mining operations*” – The URS designation with a MRO designation does not allow for expansion or development of all the current uses within Kitsap Quarry or permitted uses under the UTF Mineral Resource CUP:

- Aggregate processing and related office (Expand existing use),
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- Concrete batch plant (Develop, UTF Mineral Resource CUP),
- Soil dump site (Expand existing use),
- Concrete and Asphalt recycling (Expand existing use).

However, the RI designation allows for all these uses and fits with the type of industrial uses that occur in the adjacent industrial land.

15.3. Rural Commercial/Industrial and Type III LAMIRD Reclassification

Requests. a. - We disagree with the statement that “*RI zoning would not be consistent with the surrounding area*”. Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road (an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton. It is also important to note that the URS Designation states “*This zone may also apply to properties which are being considered for non-residential use.*”

Importantly, future citizens of Kitsap County will benefit greatly from having access to the aggregate processed at Kitsap Quarry. This is a 100+ year source of aggregate. This aggregate processing facility represents the bulk of the permitted aggregate in Kitsap County. These permitted aggregate resources ensure that future citizens of Kitsap County have aggregate resources available close to the population center of Kitsap County, reducing costs, truck traffic and environmental issues that would occur if a significant amount of aggregate continues to be imported into Kitsap County.

16.3. Rural Commercial/Industrial and Type III LAMIRD Reclassification

Requests. c. – Response to comment that *“No unmet need has been identified”*. As I mentioned before, Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City limits of Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via out Werner Road (an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton.

17.3. Rural Commercial/Industrial and Type III LAMIRD Reclassification

Requests. e. – Response to statement that *“properties are not contiguous to properties zoned RI”*. Though not adjacent to properties zoned RI, these parcels are bounded on two sides (East and South) by properties located within the City of Bremerton and zoned Industrial and have similar current and future uses. As previously mentioned, Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City of Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road (an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton.

18.3. Rural Commercial/Industrial and Type III LAMIRD Reclassification

Requests. g. Though not adjacent to properties zoned RI, these parcels are bounded on two sides (East and South) by properties located within the City of Bremerton and zoned Industrial and have similar current and future uses.

This is a unique situation in which Kitsap Quarry is an established industrial use (50+ years) adjacent to other industrial uses and zoning that is within the City of Bremerton. The industrial uses at Kitsap Quarry predate the Growth Management Act. The parcels in question may have been designated URS originally because the access was via Kitsap Lake Road (Residential). Now that truck traffic is entering/leaving via Werner Road (an existing industrial road) instead of Kitsap Lake Road (residential) it makes more sense from a public

interest standpoint and is more consistent with the intent of the Growth Management Act to designate these parcels RI with the long term industrial designation when these parcels are incorporated into the City of Bremerton.