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Allison Satter, Senior Planner

December 7, 2015

David Greetham and Steve Heacock  
Kitsap County Department of Community Development  
614 Division St  
Port Orchard, WA 98366

re: Kitsap County 2016 Comprehensive Plan Update – City of Bremerton Comments

Dear Mr. Greetham and Mr. Heacock:

The City of Bremerton provides the following comments on the Kitsap County Working Draft Comprehensive Plan Update released in November 2015. We thank you for the opportunity to review and comment on your draft document and we hope that these comments will be addressed in the County's next published document.

**1) Chapter 8: Subarea Plans.**

- a) This section does not make reference to the Gorst Subarea Plan, though it is mentioned to be adopted within the Environmental Review. For clarification, the city recommends an introduction section to Chapter 8 that mentions the Subarea Plans that will be adopted by reference.

**2) Environmental Review:**

- a) Exhibit 2.6-21 Alternative 1. No Action Growth Assumptions has identified City of Bremerton target population and employment targets. However, Alternative 2 and 3 corresponding charts (Exhibit 2.6-28 and 2.6-35) has a revised number for the Growth Assumption within the City of Bremerton limits. The City is concerned that the proposed alternative affects the assumed population growth and employment target within City limits (example: Alternative 1 has a growth assumption in the City limits of 13,757 people, but Alternative 2 and 3 has a growth assumption in the City limits of 12,985).
- b) Exhibit 2.6-22, 2.6-29 and 2.6-36. UGA Capacities and Target. It is difficult to discern different proposals and their impact to the population (with relation to capacity and targets). City is requesting individual data charts be provided for each UGA, as the summarized capacity is hard to track. The City would like to support the proposed Alternative that has similar population and employment target to our capacity.
- c) Appendix B. Exhibit 4: Regional Growth Centers and Manufacturing Centers Map. The Puget Sound Industrial Center-Bremerton (formerly South Kitsap Industrial Area)

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Manufacturing Industrial Center (MIC), as identified by Puget Sound Regional Council (PSRC), has been left off the map.

**3) Urban Growth Areas (UGAs):**

a) East Bremerton UGA:

- i) The City is supportive of the Alternative 1 or 3 for the area near Enetai as it proposes densities (1-5 dwelling units/acre) that could support the investment and construction of new capital facilities. This directly correlates with the proposed CapF and Utilities Policy 19 which is to *consider appropriate land use and zoning map amendments if funding for capital facilities fall short of expectations or if levels of service cannot be adjusted to compensate for any shortfall*. If this area is designated as Alternative 2 proposes (1-4 dwelling units/acres), it is likely that the City would struggle to find funding for the capital facilities needs for this area as there will be inadequate density to support capital projects.
- ii) The City is generally supportive of Alternative 2 or 3 with the proposal to remove a portion of the East Bremerton UGAs southwest of Riddell Road. The City is supportive as this reduction in the East Bremerton UGA allows the expansion for public service delivery in the West Bremerton UGA. However, as Comment 2(b) in the Environmental Review mentions, further information on the targeted population for this revision may affect the size of these reductions and expansions and we cannot fully weigh in on the proposal until we see the data analysis.

b) West Bremerton UGA:

- i) The City is supportive of Alternative 2 or 3 with the expansion of the West Bremerton UGA for the northern and southern areas of Kitsap Lake for public service delivery. However, as Comment 2(b) in the Environmental Review mentions, further information on the targeted population for this revision may affect the size of this expansions and we cannot fully weigh in on the proposal until we see the data analysis.
- ii) The City is not supportive of the Alternative 3 to increase in density (Urban Medium Residential, 10-18 Dwelling units per acre) within Rocky Point and West Hills. The UGAs would have a higher density than permitted by the City in the surrounding area (which is Low Density Residential 5-10 dwelling units per acre). This proposal contradicts the City's strategic planning efforts to encourage population to the Centers.
- iii) The City is supportive of the change from Industrial to Urban Low Residential within Navy Yard City as the City is proposing similar proposals within that vicinity with the City's Draft Comprehensive Plan Update.

c) Gorst UGA:

- i) The City is supportive of Alternative 2 for the Gorst UGA.
- ii) Within the Draft SEIS page 4-20 discusses Ryan's proposal (4.2.21) which seems to be near the Gorst UGA. More information is needed in order to clarify the City's position for 4.2.21. Without a correlating map or parcel numbers, staff was unable to verify the proposed location.

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d) Watershed:

- i) The City of Bremerton has acquired land within County jurisdiction that is adjacent to City of Bremerton limits for our Watershed Management. The City requested that the area be designated to the City of Bremerton and can be seen in the document attached to this letter. The West Bremerton UGA map shows a portion of the area in question, however it does not appear to be assigned to a UGA. The City is requesting that the area around the City watershed be designated to the City of Bremerton for future annexation for municipal services.

e) Central Kitsap UGA:

For more than 10 years, and on multiple occasions, the City of Bremerton has been requesting that the Central Kitsap UGA be associated to the City of Bremerton. As stated in our most recent letter dated April 23, 2015 we believe that the common goals that should be reflected in both the County and City Comprehensive Plans should be the association of all UGAs that are adjacent to the City of Bremerton.

We again formally request that the Central Kitsap UGA be associated with the City of Bremerton. By associating this UGA to the City of Bremerton, Kitsap County would finally meet the expectations that the County agreed to in the 2005 GMA Settlement agreement that the County agreed to associate unassociated UGAs.

Specifics comments about the CK UGA are:

- i) The environmental review (page 2-65) makes reference in Alternative 3 to the Central Kitsap UGA boundaries being increased along Barker Creek and north SR 303 causing the UGA boundaries to abut Silverdale and Central Kitsap. The City is not supportive of this portion of Alternative 3 to connect Silverdale and Central Kitsap.
- ii) In 2015, the Kitsap Countywide Planning Policies were amended to shift population away from CK UGA and reallocated into Silverdale to accommodate the area needed for the growth expectations as a regional growth center. The CK UGA should not be expanded to accommodate sprawling growth as proposed in Alternative 3.
- iii) As identified by the Countywide Planning Policies, County and Cities shall have separate urban areas by creating and preserving a permanent network of urban and rural open space, and critical areas. By connecting CK UGA to Silverdale, this has removed a critical area separator (Barker Creek). This stream corridor should be protected and encouraged to remain protected through County's designation. The CK UGA should not be expanded as the proposal conflicts with the Countywide Planning Policies.
- iv) If the County has determined that the CK UGA does need to be expanded, the area removed from the CK UGA north of Riddell in Alternative 3 is a better candidate for growth. The subject area exhibits a more intense urban development pattern, with less critical areas present than lands near Barker Creek, and therefore should be considered to remain in the CK UGA before Barker Creek is considered to be added.

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Thank you for the opportunity to comment. Please notify us of any action taken with respect to this document. If you have any questions or need additional information, please contact me at 360-473-5845.

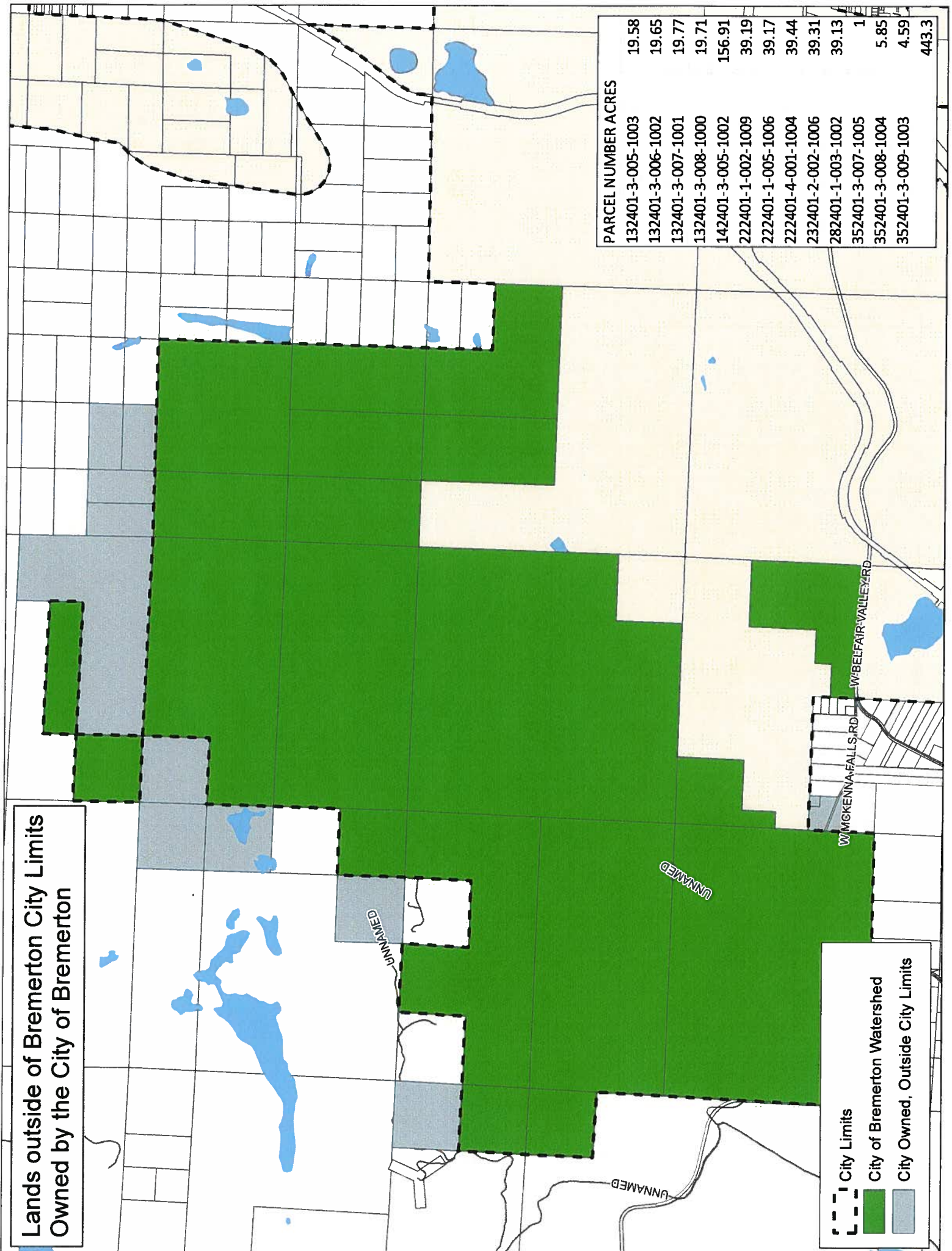
Respectfully,

A handwritten signature in purple ink, appearing to read "A Satter".

Allison Satter  
Senior Planner

cc: file; COB Legal Department

**Lands outside of Bremerton City Limits  
Owned by the City of Bremerton**



PARCEL NUMBER	ACRES
132401-3-005-1003	19.58
132401-3-006-1002	19.65
132401-3-007-1001	19.77
132401-3-008-1000	19.71
142401-3-005-1002	156.91
222401-1-002-1009	39.19
222401-1-005-1006	39.17
222401-4-001-1004	39.44
232401-2-002-1006	39.31
282401-1-003-1002	39.13
352401-3-007-1005	1
352401-3-008-1004	5.85
352401-3-009-1003	4.59
	443.3

**Legend**

- City Limits
- City of Bremerton Watershed
- City Owned, Outside City Limits

W MCKENNA FALLS RD  
W BELFAIR VALLEY RD

UNNAMED

UNNAMED

UNNAMED