



PORT GAMBLE S'KLALLAM TRIBE
NATURAL RESOURCES DEPARTMENT
31912 Little Boston Rd. NE – Kingston, WA 98346

December 7, 2015

Kitsap County
Comprehensive Plan Update,
Planning and Environmental Programs Division,
Dept. of Community Development,
MS-36, 614 Division Street,
Port Orchard, WA 98366
compplan@co.kitsap.wa.us

Subject: Draft Supplemental EIS, Draft Comprehensive Plan Update 2016-2036

Dear Steve Heacock,

Thank you for the opportunity to comment on Kitsap County's draft Supplemental Environmental Impact Statement, Draft Comprehensive Plan Update, associated Draft Capital Facilities Plan, and Preliminary Land Use Reclassification Request Reports. On behalf of the Port Gamble S'Klallam Tribe's Natural Resources Department, I am submitting the following comments in support of Alternative 2 with recommendations related to cultural resources enhancement and protection, planning for the effects of climate change, and participation in the planning process for public services and utilities.

We support the County's Alternative 2 proposal, which represents a 4% net reduction of Urban Growth Area (UGA) lands and is consistent with the principles and directives of the Growth Management Act. Alternative 2 directs growth into UGA boundaries and promotes mixed uses and higher densities in centers and corridors, while protecting the rural character of the areas outside the UGA boundaries. We do not support the County's Alternative 3 proposal, which would result in a net 4% increase in UGA lands over the 20-year period.

Protecting Historic and Cultural Resources

Protecting Kitsap County's valued historic and cultural resources, including archeological resources, should be considered part of comprehensive planning for the next 20 years. By supporting opportunities for participation in cultural activities, and by advancing the protection of historic and cultural resources, the County will contribute toward improving the quality of life for its residents. The Draft Comprehensive Plan Update and SEIS did not include goals, plans or policies that would adequately protect and enhance these resources.

While the management of cultural resources crosses jurisdictional boundaries, the County may consider forming partnerships with Tribes, cultural organizations, residents and other entities, to coordinate plans for the preservation of cultural



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resources in the face of increasing population growth. Protecting these resources should be an integral part of County planning and community development. For example, project applicants should be required to consult with Tribes and cultural organizations as part of the County permitting process for development. The County should include cultural protection as one of the goals for its climate change, conservation, and parks programs and urban area plans. By promoting cultural education and opportunities for cultural activities that support diversity, cultural heritage and cultural tourism, the County will likely improve the social and economic vitality of its residents into the future.

Preparing for the Effects of Climate Change

The County makes a notable effort to limit greenhouse gas emissions through 2036 by setting targets and working to achieve them through land use, transportation and development strategies. However, the Draft Comprehensive Plan Update does not go far enough in planning for the effects of climate change. Addressing climate change is perhaps one of the most important challenges the County will face over the next 20 years and beyond, including the potential for significant environmental and economic impacts. Climate change has the potential to significantly effect natural and cultural resources, land use, human health and public safety. It is essential that the County address these issues now through the current Comprehensive Plan Update, since the next update in 2036 is likely to be too late for adequate preparation.

The County's Environment Policy 4 of the Comprehensive Plan Update requires the IRT or other entities to develop and implement climate change adaptation strategies that create more resilient communities against negative impacts of climate change. This policy and the Comprehensive Plan Update in general do not go far enough to describe the specific process and timeframe for this important work. The County should incorporate climate change planning in every aspect of the Comprehensive Plan Update and include specific steps for developing a Climate Action Plan that addresses local climate change impacts.

Rising sea levels and increased flooding events are anticipated, potentially changing the profile of our shorelines and floodways. The Comprehensive Plan Update should include policies and strategies for implementing a comprehensive assessment of risks to sea level rise and other environmental changes countywide. The plan should also include a process for developing policies and strategies that protect floodways, natural and cultural resources, public infrastructure and human health. Preparing for effects on stormwater, wastewater, water resources, salmon recovery, flooding risk, emergency management and other components of County planning are key in reducing our vulnerability to climate change.



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Planning Public Services and Utilities for Future Growth

The Comprehensive Plan Update and Capital Facilities Plan outline the need for increasing the capacity of public services and utilities to accommodate projected growth under each alternative. The details of the utility plan revisions are not presented in the Comprehensive Plan Update and Capital Facilities Plan, but general timeframes and strategies for developing the revisions are provided to some extent. The needed revisions include increasing solid waste capacity, additional sanitary sewer services, additional stormwater drainage systems, expanding water supply systems, and increasing transportation services.

While proposed mitigation measures for the effects of each alternative on public utilities have been identified in the SEIS, the details of the public utility revisions to accommodate population growth are not yet provided. The details of the utility plans are needed to fully determine the adequacy of the proposed mitigation measures and the capacity of the capital facilities to accommodate future growth. Therefore, the PGST Natural Resources Department would like to stay informed about these utility plans and to participate in the process for developing utility plan revisions that will address future population growth as they proceed. We appreciate the opportunity to continue working with the County and KPUD to review and comment on utility plan revisions as they are further developed. In addition, we would like to be involved in the County's climate change planning process as appropriate.

Thank you for your consideration of these comments. I look forward to reviewing the next drafts of the Comprehensive Plan Update and SEIS incorporating public comments. I would appreciate you keeping me informed about any related notices and distributions.

Sincerely,

Roma Call
Port Gamble S'Klallam Tribe
Natural Resources Department