



December 4, 2015

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SUBJECT: Response To Staff Report For Schourup, LLC's UM to Urban Industrial Site Specific Comprehensive Plan Amendment / Rezone – Permit No: 15 00739

Dear Katrina, Jeff,

This letter is a response to the Staff Report issued on November 9, 2015 analyzing the Schourup, LLC's Site Specific Comprehensive Plan Amendment / Rezone proposal to reclassify and rezone Mr. Schourup's property on Ida Street West and Werner Road West in the West Bremerton area. The subject property is further referenced by Kitsap County Assessor / Tax Numbers – 04527-002-013-0006, 04527-002-016-0003 & 04527-002-017-0002.

It is noted that the staff report contains no specific recommendation. There are none-the-less implied recommendations or conclusions. Many of the comments made by staff seem to ignore the applicant's responses to the same questions. That begs the question as to how the two documents, i.e. the applicant's responses verses the staff's analysis is to be presented to the Planning Commission and ultimately to the Board of County Commissioners? Also it should be noted that the format of criteria questions addressed by staff is problematic and therefore confusing as there are criteria questions not posed in the application material and there is a different order of criteria assessments not found in the Supplement Site Specific Comprehensive Plan Criteria.

Since the staff report assessment of Mr. Schourup's Plan Amendment / Rezone request leads to the conclusion the proposed Comprehensive Plan Amendment satisfies the criteria for approval, the applicants response comments herein are to provide clarifications not found in the staff report or to question the meaning of statements made:

Background –

The staff report mentions that the parcel, "has moderate geological hazards, and one of the parcels shows hydric soils indicating a small area of potential wetlands in the northeast corner."

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Also mentioned is: "The property to the east has identified, surveyed wetlands." With respect to these issues, it is well to note that the graveled parking lot, previous site filling activity, concrete retaining wall and installed storm water control system were all facilities or activities that took place on the site after permit approval had been obtained from Kitsap County prior to or in conjunction with the improvements to the site allowing the creation of that parking lot. Also considered at the time of project approval were the potential and mapped wetland areas cited by staff. Even though the site appears undeveloped it is better characterized as a developed site with a use that was conditionally approved.

While it is true the site is Zoned Urban Medium, the surrounding uses to the west and north are industrial within the City Limits of Bremerton.

Surrounding Zoning and Land Use –

The "Exhibit 1" chart found on Page 2 is not accurate and not consistent with the information presented by the applicant. The current land use on the west and north of the subject property is **not** Government and Services. It is in fact an industrial use and has been for a very long time, even predating GMA planning activity. Apparently Staff has chosen to characterize developed property with large industrial buildings as uniformly "Government and Services" without looking to see if the land is properly categorized as "public" and owned or controlled by some governmental agency.

EVALUATION –

General Criteria (KCC 21.08.070.A)

These General Criteria questions were not part of the application material the applicant was required to address or at least not as worded and presented in the staff report

A.3 – How the requested re-designation is in the public interest and the proposal is consistent with the Kitsap County Comprehensive Plan -

Staff says that the County "aims to focus a greater share of growth into the urban areas, which may include rezoning properties within the existing UGA boundary to increase capacity as necessary to accommodate growth targets." And the Staff goes on to say that, "**It may not be in the County's interest to approve the amendment** if additional employment capacity is added by virtue of approving this request." (Emphasis added)

This is a pretty incredible statement that is not clarified by reference to Criteria D.1.b. The issue is not really whether Bremerton needs additional employment, but whether it would benefit the County. The answer is a clear **yes it would!** Kitsap County and all other counties in the State of Washington should have been up in arms about the requirements of GMA, because anybody who could read tea leaves, would have to come to the conclusion that GMA planning

would ultimately undercut the tax base of Counties. This is an example of how that can occur on an incremental basis and there are a lot of others right here in Kitsap County.

Based on the analysis and conclusions Staff has presented, the clarifying comments of this response and the original application material, demonstrates the Schourup, LLC proposed Urban Industrial Site Specific Comprehensive Plan Amendment / Rezone has met the criteria for approval.

Please allow the applicant to reply to any further Staff analysis and/or conclusions drawn, prior to submittal of document to the Planning Commission for Public Hearing. Also, clarification is needed to determine whether the comments contained in this letter are to be included in the response to the Draft Supplemental EIS, before the Final Supplemental EIS is published.

Thank you for the opportunity to respond to the Staff Report.

Sincerely,

A handwritten signature in blue ink, appearing to read "William M. Palmer", with a large, sweeping flourish extending to the right.

William M. Palmer
W.M. PALMER CONSULTANTS

cc. Bill Schourup