



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way North, Olympia, WA 98501-1091 • (360) 902-2200 • TDD (360) 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

Wednesday, November 25, 2015

Kitsap County Planning and Environmental Programs Division
Department of Community Development
MS-36, 614 Division Street
Port Orchard, Washington 98366

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KITSAP COUNTY DEPT OF
COMMUNITY DEVELOPMENT

SUBJECT: Kitsap County Draft Comprehensive Plan Update

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review the Draft Comprehensive Plan Update. We have reviewed this document and have a few comments at this time.

Chapter 3- Environment

Environmental Goal 3, Policy 12. This policy identifies a policy for maintenance, review, and revision of scientific maps and data to provide information during development review and planning. We recommend that this policy be revised to include a complete inventory of County-wide habitat resources, including streams, wetlands, and shorelines. This inventory could also include other features, such as barriers to fish passage and could be completed through coordination with other public, private, and non-profit entities.

Environmental Goal 3, Policy 15. This policy states that compensatory mitigation shall be the last option of resort in mitigation sequencing. We recommend that this policy be supplemented to include stricter enforcement of mitigation sequencing, such as better demonstration of efforts to avoid and minimize impacts to the natural environment during development.

Environmental Goal 3, General. We recommend that the County consider including a goal to establish a certified mitigation bank in Kitsap County. Certification of mitigation banks through the Department of Ecology increases the effectiveness of the mitigation bank by analyzing which functions the bank can effectively replace and which functions are irreplaceable and should be preserved or restored in-place. Recent science indicates that mitigation banks can provide large-scale benefits on a watershed scale and provide a good alternative to small isolated mitigation sites.

Chapter 8- Subarea Plans

Silverdale Sub Area Plan, General. This section does not include goals related to the natural environment. The Silverdale Sub Area contains many natural resources, including streams, wetlands, riparian areas, and shorelines. We recommend that this section be expanded to include goals related to the natural environment and the specific resources available in the Silverdale Sub Area.

Silverdale Regional Center. SRC Environmental Goal 11, Policy 51. This policy encourages the development of boardwalks or walking paths in riparian corridors. While this type of development promotes health and recreation opportunities, we encourage the County to recognize that even seemingly passive uses can result in environmental



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impacts. For example, heavy trail use by pedestrians and pets can discourage wildlife from seeking refuge in the few remaining natural corridors within the heavily urbanized Silverdale area. We recommend that this policy be implemented in conjunction with riparian restoration and enhancement to minimize impacts to the natural environment. Additionally, we encourage the County to consider lower impact alternatives during trail design. For example, trail mainstems could be located outside riparian buffer areas, with smaller spur trails extending into buffer areas for stream and wildlife observation. This would create less disturbance within the buffer area than locating the entire trail mainstem within the buffer.

Thank you for considering these comments in your review. Please contact me at (360) 895-4756 to discuss any questions you might have.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brittany N. Gordon".

Brittany N. Gordon

WDFW Habitat Biologist

Brittany.gordon@dfw.wa.gov



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SUBJECT: Draft Supplemental Environmental Impact Statement for Kitsap County 2016 Comprehensive Plan Update

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review the Draft Supplemental Environmental Impact Statement for Kitsap County 2016 Comprehensive Plan Update.

In general, we feel that the proposed alternatives concentrate development in appropriate areas and are protective of the County's more pristine habitats and natural resources. Due to the overall reduction in Urban Growth Areas, Alternative 2 would be preferred over Alternative 3. We have a few site-specific comments as well, which are addressed below.

Silverdale Urban Growth Area

Under Alternative 3, the properties along Trigger Avenue would be rezoned from Rural Commercial to Business Center. This area contains a forested riparian corridor, through which the west fork of Clear Creek flows. This is documented spawning habitat for Coho salmon and also has documented presence of Fall Chinook and Fall Chum salmon. The Business Center zoning would support higher intensity land uses in this area, which could result in impacts to Clear Creek and fish life through buffer impacts, increased stormwater runoff and pollution, increased disturbance, and habitat fragmentation. Additionally, forested corridors provide important refuge habitat for wildlife in urban areas, such as Silverdale.

Bremerton East Urban Growth Area

Under Alternative 2, the Illahee greenbelt would be expanded, while under Alternative 3, the zoning would change from Urban Low Residential (5-9 DU/Ac) to Urban Restricted (1-5 DU/Ac). While both alternatives are more protective of shoreline habitat than under existing zoning, we prefer Alternative 2 because it offers increased protection to an important shoreline. This shoreline is known spawning habitat for surf smelt, which spawn on intertidal beaches. Additionally, this area includes a salmon-bearing stream; bald eagle nests; habitat for hardshell clam, geoduck, and Pacific herring; and estuarine and marine intertidal habitat. This shoreline also provides many water-related recreational opportunities for fishing, boating and kayaking, and enjoying the scenic beaches.

Thank you for considering these comments in your review. Please contact me at (360) 895-4756 to discuss any questions you might have.

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SUBJECT: Kitsap County Land Use Reclassification Draft Staff Reports

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review the Draft Comprehensive Plan updates and the proposed land use reclassification applications. We have reviewed the Land Use Reclassification Request Draft Staff Reports and have the following comments at this time. The primary intent of these comments is to identify potential species and habitats that could be affected by proposed higher intensity land uses. We hope that this supplemental information will assist the County's evaluation of these proposals.

Nonresidential

Permit Number: 15 00522. This application proposes the site zoning be changed from Urban Reserve (URS) (except for 1 parcel located in the incorporated City of Bremerton) to Rural Industrial (RI) with Mineral Resource (MR) overlay. According to the WDFW SalmonScape database, the property contains one perennial stream, which is a tributary to Kitsap Lake, and is documented rearing habitat for Coho salmon. In addition, the SalmonScape database identifies two intermittent streams on the property, which may have fish use during the wet season. Furthermore, the Priority Habitats and Species database identifies freshwater forested/shrub wetlands associated with the streams, which may provide additional habitat for fish, amphibians, and other species. The site is located on the edge of a large forested habitat corridor. The proposed zoning change would support a higher intensity land use at the site, which could result in impacts to the streams and fish life through increased disturbance, buffer impacts, pollution, runoff, and other industrial and mineral resource activities that could occur under the proposed zoning. Additionally, allowing higher intensity land uses in this area could encourage future development encroachment into the undeveloped forested habitat to the west.

Permit Number: 15 00607. This application proposes the site zoning be changed from Rural Residential (RR) to Rural Industrial (RI). According to the WDFW SalmonScape database, the property contains Scandia Creek, which is a perennial stream. Coho spawning habitat is documented on the property, as well as fall chum and winter steelhead presence. The proposed zoning change would support higher intensity land uses at the site, which could result in impacts to the stream and fish life through increased disturbance, buffer impacts, pollution, runoff, and other industrial activities that could occur under the proposed zoning.

Permit Number: 15 00378. This application proposes the site zoning be changed from Rural Residential (RR)/Rural Protection (RP) to Neighborhood Commercial (NC). According to the WDFW SalmonScape database, the property is adjacent to Grovers Creek, a perennial stream with documented Coho salmon presence. According to the Priority Habitats and Species database, the property may contain wetlands associated with Grovers Creek and its floodplain;



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these wetlands may provide fish habitat such as rearing habitat for juvenile Coho salmon. The proposed zoning change would support higher intensity land uses at the site, which could result in impacts to the stream and fish life through increased disturbance, buffer impacts, pollution, runoff, and other commercial activities that could occur under the proposed zoning. Additionally, including this parcel as part of the George's Corner Limited Area of More Intense Development (LAMIRD) would expand the LAMIRD and could encourage future land use conversions or nonconforming uses on adjoining parcels, eventually resulting in commercial sprawl.

Permit Number: 15 00689. This application proposes the site zoning be changed from Rural Protection (RP) to Rural Commercial (RCO). According to the WDFW SalmonScape database, Dogfish Creek is located in the southeast corner of the property. This is a perennial stream with documented Coho salmon presence. The proposed zoning change would support higher intensity land uses at the site, which could result in impacts to the stream and fish life through increased disturbance, buffer impacts, pollution, runoff, and other commercial activities that could occur under the proposed zoning.

Permit Number: 15 00701. This application proposes the site zoning be changed from Urban Restricted (UR) to Industrial (IND). According to the WDFW SalmonScape database, Steele Creek is located on the property and is a perennial stream with documented Coho salmon presence. The proposed zoning change would support higher intensity land uses at the site, which could result in impacts to the stream and fish life through increased disturbance, buffer impacts, pollution, runoff, and other industrial activities that could occur under the proposed zoning.

Permit Number: 15 00380. This application proposes the site zoning be changed from Urban Restricted (UR) to Highway Tourist Commercial (HTC). According to the WDFW SalmonScape database, Gorst Creek is located on the property. This is a perennial stream with documented Fall Chinook spawning, Coho spawning, Fall Chum spawning, and Winter Steelhead spawning habitat. The proposed zoning change would support higher intensity land uses at the site, which could result in impacts to the stream and fish life through increased disturbance, buffer impacts, pollution, runoff, and other commercial activities that could occur under the proposed zoning.

Residential

Permit Number: 15 00686. This application proposes the site zoning be changed from Rural Wooded (RW) to Rural Residential (RR). According to the WDFW SalmonScape database, a fish bearing stream is located on the property. This stream is identified as habitat for Coho salmon. Additionally, the Priority Habitats and Species database identifies a large freshwater emergent wetland associated with the stream on the property. This wetland may provide fish habitat as well. The proposed zoning change would encourage residential development at the site, which contains a relatively contiguous expanse of mature native forest habitat, in addition to stream and open water wetland habitat. This could result in impacts to fish and wildlife through increased disturbance, clearing, habitat fragmentation, buffer impacts, pollution, runoff, and other activities that could occur under the proposed zoning.

Permit Number: 15 00714. This application proposes the site zoning be changed from Rural Wooded (RW) to Rural Residential (RR). According to the WDFW SalmonScape database, a perennial stream is located on the property; this



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stream is a tributary to Coulter Creek, a fish bearing stream. The proposed zoning change would encourage residential development at the site, which contains a relatively contiguous expanse of mature native forest habitat, in addition to stream habitat. This could result in impacts to fish and wildlife through increased disturbance, clearing, habitat fragmentation, buffer impacts, pollution, runoff, and other activities that could occur under the proposed zoning.

Thank you again for the opportunity to review these staff reports. Please contact me at (360) 895-4756 to discuss any questions you might have.

Sincerely,

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