

**Kitsap County**  
**Department of Community Development**  
**Comments:**  
**Draft Illahee Community Plan: dated September 15<sup>th</sup>, 2006**

<b>Chapter/Section</b>	<b>Page</b>	<b>Comment / Correction</b>	<b>Notes</b>
<b>General</b>			
General	N/A	Generally, the plan is well-written and easy to read. However, it is clearly written from the viewpoint of the community, and may require major revisions if adopted and is required to be enforced by the county.	
General	N/A	There are sections that may not be appropriate for a County document, such as the "frequently-asked questions," or if, included, would need to be modified. (E.g., the FAQ #2 which states that the current Kitsap County comprehensive plan "may not be what residents expect or want.").	
General	N/A	The plan also includes some areas that may be overstated and may indicate differences of opinions - particularly where describing storm water impacts.	
General	N/A	There are also implications throughout this plan that the "pre-GMA" zoning densities should govern current land use designations which may be inconsistent with GMA requirements, Central Puget Sound Growth Management Hearings Board orders, and court decisions.	
<b>Chapter 1</b>			
Chapter 1 Section 1.1	1-1	<i>Section 1.1.</i> The document cites the fact that "in 1916, Illahee was officially chartered as a recognized community in Kitsap County." This designation should be further clarified.	
Chapter 1 Section 1.1	1-2	Paragraph 2: The county may want to change this Paragraph as it claims that "the Illahee area was previously overlooked or ignored in the comprehensive plan" and that the county did not consider some issues when it applied "blanket zoning" for the area.	

<b>Chapter/Section</b>	<b>Page</b>	<b>Comment / Correction</b>	<b>Notes</b>
Chapter 1 Section 1.2	1-2	<i>Section 1.2</i> , Paragraph 2 - suggest use of the term "non-native person" instead of "white person." Again, while this history is interesting, it may be better if there were citations to records that substantiate it. For example, the detail in Paragraph 3 that the first road was established with blasting powder supplied by the county would have to come from some source. The history also references a "historical record," and "covenant agreement" that must refer to some written documents.	
Chapter 1 Section 1.4	1-7	<i>Section 1.4</i> When the county finalizes the community plan, this section should reflect the public participation that the county sponsored.	
Chapter 1 Section 1.5	1-8	<i>Section 1.5</i> : Suggest changing the second sentence to read "At the time of adoption, the county has reviewed the goals . . . ."	
<b>Chapter 2</b>			
Chapter 2 Section 2.1	2-1	<i>Section 2.1</i> Third sentence: This description is not necessarily GMA "standards" but the Growth Board's interpretations of appropriate rural and urban densities. Further the Growth Board has determined that urban densities are four (not five) dwelling units per acre. Finally, the last sentence in Paragraph 1, I would suggest adding the following "The Act allowed for some lot sizes between these two classifications under special circumstances."	
Chapter 2 Section 2.2	2-1	<i>Section 2.2</i> The Growth Board validated the plan in 1999, not 2000. This section only recognizes a few UGAs, not all of them ( Bainbridge Island, SKIA, etc). The sentence that reads: "Other areas with many urban characteristics (lot sizes and lack of infrastructure) were designated rural. . ." is confusing. (Was this mean to say "rural characteristics"?). Further the rural designations are a minimum five acre lot size, there are some designations that are minimum 10 or 20 acres.	

Chapter/Section	Page	Comment / Correction	Notes
Chapter 2 Section 2.2	2-1	Section 2.2 This Paragraph states that Illahee is seeking a "rural designation." This conflicts with the zoning they have provided in chapter 3. For Kitsap County adoption, the community plan must be internally and externally consistent, that is consistent with the rest of the county's comprehensive plan and with other community plans per RCW 36.70A.100. This statement may be inconsistent with portions of this plan as well as the Kitsap County comprehensive plan (and may also be inconsistent with the City of Bremerton's comprehensive plan).	
Chapter 2 Section 2.3		<i>Section 2.3</i> This section may not be supported by Kitsap County - as it implies that Kitsap County did not do its work on the 1998 comprehensive plan. Also, it uses the term "semi-rural" which is something that does not exist under the GMA. Under GMA, land must be urban, rural, or resource land.	
Chapter 2 Section 2.5	2-2	<i>Section 2.5</i> In this section, it is first suggested that Illahee be designated a Limited Area of More Intense Rural Development ("LAMIRD"). A LAMIRD may not be located too closely to a UGA. <i>The Growth Board has determined that a LAMIRD 400 feet from a UGA boundary did not comply with GMA.</i> Rather, areas such as Illahee that are pre-existing at densities higher than rural areas are considered candidates for eventual expansion of UGAs, and would not be GMA-compliant to designate it as a LAMIRD.	
Chapter 2 Section 2.5	2-2	The community suggests using the LAMIRD criteria to define this Illahee land use. It may not be legally supportable for Kitsap County to do so, since the LAMIRD criteria are designed to <i>rural</i> limit areas to their pre-GMA conditions. As discussed above, Kitsap County has been directed by the Growth Board for its attempts to use pre-existing development as a template for future growth.	
Chapter 2 Section 2.5	2-5	<i>Figure 2.1</i> The "key" on this map is not legible, but there is a blue dotted line as well as a thick white line showing the boundary of the Illahee community.	

<b>Chapter/Section</b>	<b>Page</b>	<b>Comment / Correction</b>	<b>Notes</b>
Chapter 2 Section 2.7	2-6	<i>Section 2.7</i> The discussion regarding Goal 2 and Goal 4 on page 2-8 may not be consistent with the GMA goals to increase urban densities and maintain compact urban development. The discussion states that Illahee is at "near build-out status" which implies, again, that pre-GMA densities should control future land use.	
Chapter 2 Section 2.7	2-7	The discussion regarding Goal 8 includes a golf course and the community dock as "Natural Resource Industries." Natural resource industries are defined by the State to include mining, agriculture and timber. Neither recreation or fishing may be technically considered as natural resource industries.	
<b>Chapter 3</b>			
Chapter 3 General	N/A	This chapter was very confusing. It was clearly determined what the land use designations really are, with many allusions to the pre-GMA conditions as appropriate land use. And while the chapter sets forth " Illahee" zoning designations, it also uses minimum lot sizes for new lots on septic. Given that Kitsap County has been ordered to serve all UGAs with public sewer within the twenty year time frame, and given "footnote 48" in the county zoning ordinance, there presently are not any approved code to allow new subdivisions in Illahee to use septic systems.	
Chapter 3 Section 3.1	3-1	<i>Section 3.1</i> The stated facts and quotations would be required to include the documentation source and substantiate facts to be included in a County document.	
Chapter 3 Section 3.2	3-2	<i>Section 3.2</i> Table 3-2 shows the minimum lot size of UR zone as 7,000 square feet, which is not accurate. UR has no minimum lot size.	
Chapter 3 Section 3.3	3-3	<i>Section 3.3</i> If the Illahee Restricted Residential zone will replace and encompass more land than the current urban restricted, then the designation of this required the data to justify the environmental restrictions proposed for those parcels. Changes in all comprehensive plan land use designations will require some analysis of changes to the land capacity analysis and a basis for the change.	
Chapter 3 Section 3.4	3-5	<i>Section 3.4</i> Changes in all comprehensive plan land use designations will require some analysis of changes to the land capacity analysis and a basis for the change.	

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Chapter 3 Section 3.5	3-6	<i>Section 3.5</i> This section is very confusing. First - there is a description of minimum lot size that contravenes the zoning set forth in section 3.3. It implies that a minimum lot size of 12,500 is required for lots without sewers. The 12,500 square foot requirement is a Health District regulation and is not a land use standard. More importantly, Kitsap County cannot plan for septic in an urban area. If an area cannot be sewerred, the current comprehensive plan calls for analysis of alternative treatment systems at urban densities, which may not require a 12,500 square foot lot.	
Chapter 3 Section 3.5	3-6	No legal justification was provided for the requirements for "nonconforming lot" aggregation. It may not be supportable to use the language from the Manchester LAMIRD, which must try to correlate to pre-GMA conditions, in a subarea plan in a UGA. Moreover, this language (1) implies that 12,500 is a "minimum lot size" which is not GMA-compliant; and (2) would result in urban-sized lots being aggregated to create "sub-urban" or sprawl size lots - again not GMA-compliant.	
Chapter 3 Section 3.6	3-7	<i>Section 3.6</i> While the view protection is an admirable goal, it is often extremely difficult to enforce and may best be resolved between and among neighbors. Moreover, height reductions within an urban area might be seen as an "anti-reasonable measure" in that it reduces the densities if multifamily development is allowed.	
Chapter 3 Section 3.8	3-9	<i>Section 3.8</i> This section provides an example of an issue that may be overstated. It refers to "devastating storm surges" and residents expressing concerns about "unrestrained storm water" and "a noticeable decline in marine life" and the low base flow in Illahee Creek. While there may be anecdotal evidence for these conditions, supportable documentation must be provided for acceptance within a County document.	
Chapter 3 Section 3.9	3-11	<i>Goal 3.3</i> As noted several times above, this goal is not GMA-compliant.	

<b>Chapter 4.</b>			
Chapter 4 General	N/A	<i>Generally</i> For acceptance within a County Document, all assumptions and statements regarding the critical area assessment will be required to be consistent with existing Kitsap County assessments and documentation or will provide additional data to support the statements.	
Chapter 4 Section 4.1	4-1	<i>Section 4.1</i> Golf courses may not be considered as meeting Kitsap County open space definitions or requirements for public access.	
Chapter 4 Section 4.2	4-1	<i>Section 4.2</i> Kitsap maps may not identify any bull trout habitat and all assumptions of endangered species must be consistent with County date. Please note that the Kitsap County Shoreline Management Program is in the process of being updated and will be updated by 2011.	
Chapter 4 Section 4.3	4-5	<i>Section 4.3</i> The statements regarding "unmitigated" and "uncontrolled" stormwater must be substantiated with corresponding data or consistent with an existing County document to be included in a county-sponsored document.	
Chapter 4 Section 4.6	4-12	<i>Section 4.6</i> Quality of Illahee Habitat. The second paragraph states that "formal land use controls over that habitat must be recommended by the community and enacted by the county . . . ." While GMA requires public participation, and this is the process generally utilized by the county, land use controls are not required to be recommended by the community.	
Chapter 4 Figure 4.8	4-18	<i>Figure 4.8</i> Identification of wildlife corridors is well done. RCW 36.70A.160 provides: "Each county and city that is required or chooses to prepare a comprehensive land use plan under RCW 36.70A.040 shall identify open space corridors within and between urban growth areas. They shall include lands useful for recreation, wildlife habitat, trails, and connection of critical areas as defined in RCW 36.70A.030. "	
Chapter 4 Section 4.7	4-20	<i>Section 4.7</i> Some of these tree preservation provisions may require major legislative action by the Board of Commissioners in order to be enforceable.	

<b>Chapter 5</b>			
Chapter 5 General	N/A	To be accepted as a Kitsap County document, traffic and transportation assumptions be substantiated with corresponding data or consistent with an existing County document to be included in a county-sponsored document	
Chapter 5 Section 5.1	5-1	correction: "Trenton Avenue in the south" to: "Trenton Avenue to the south"	
Chapter 5 Section 5.1	5-1	Correction: "Brownsville community in the north." to: "Brownsville community to the north."	
Chapter 5 Section 5.2	5-1	Although historical speculation for cross Kitsap connections through Illahee to Bainbridge Island may have existed, no official project or analysis was conducted. Paragraph assumptions related to cause and effect of traffic were speculative and provides no data or foundations basis. Kitsap County Public Works does not agree with assertions regarding future traffic in Illahee.	
Chapter 5 Section 5.3 Figure 5.1	5-2	<i>Section 5.3</i> The map does not show any minor arterial, but Illahee road, Sylvan Way and others are described as such. Again, Kitsap County Public Works staff will need to confirm the statements in this chapter against the current county road classifications and standards.	
Chapter 5 Section 5.3	5-3	Illahee Road Classification and associated speed limits are incorrect.	
Chapter 5 Section 5.3	5-3	Speculation of higher speed limits along Illahee road will require data and supporting documentation to be included as county documents. Reasoning behind higher vehicular speeds is also speculative.	
Chapter 5 Section 5.3	5-3	NE 30 <sup>th</sup> Street, Sylvan Way, Perry Avenue, Ridell Road, Trenton Avenue, McWillimas Road, Sunset Avenue, & East Boulevard classifications and associated speed limits may be incorrect and must be consistent with Public Works documents.	
Chapter 5 Section 5.5	5-6	Minimum LOS standards are Urban designations and must be consistent with Public Works documents.	
Chapter 5 Section 5.5	5-6	Minimum LOS standards for intersections are not analyzed in Kitsap County Public Works documents.	
Chapter 5 Section 5.5 Table 5-2	5-7	2000 volume, LOS, and capacity data is not current nor consistent with Kitsap County Public Works documents.	

Chapter 5 Section 5.5 Table 5-3	5-7	Table is required to reflect 2025 projections to be current and consistent with Kitsap County Public Works documents.	
Chapter 5 Section 5.6	5-8	Document is required to reflect 2008-2013 projections to be current and consistent with Kitsap County Public Works documents.	
<b>Chapter 6</b>			
Chapter 6 Section 6.2	6-1	<i>Section 6.2</i> This section must be consistent with the Kitsap County Capital Facilities Plan and any additional data from those plans to be accepted as a County document.	
Chapter 6 Section 6.3	6-3	Section 6.3 Citations to "recent hydrological studies" should be provided with data and sources.	
Chapter 6 Section 6.3	6-3	Most of the stormwater section was written prior to the study that Kitsap County Public Works started recently and may not include the most relevant data.	
Chapter 6 Section 6.4	6-8	Section 6.4 There are citations to a report and a grant application. More documentation and sources will be required regarding the report, or a copy attached.	
Chapter 6 Section 6.5	6-8	Section 6.5 The goals and policies of this chapter will most likely require extensive revision to be consistent with the Kitsap County Capital Facilities Plan and any Growth Board's order.	
Chapter 6 Section 6.5	6-9	Policy 6.2-4 Regulation of septic systems is a State authority and not within the county's authority.	
Chapter 6 Section 6.5	6-9	Policy 6.3-2 Regulation of wells is a State authority and not within the county's authority.	
Chapter 6 Section 6.5	6-10	Policy 6.4-7 This standard for impervious surface is much more liberal than the current county standards and would require reduction of the impervious surface requirements.	
Chapter 7		Parks did not provide comments.	
Chapter 8		No comments were provided.	