

**REVISED ADDENDUM TO:
KITSAP COUNTY 2016 COMPREHENSIVE PLAN
UPDATE**

Draft SEIS: November 6, 2015

Final SEIS: April 29, 2016

Addendum: September 12, 2016; Revised August 28, 2017

Introduction

The Kitsap County 2016 Comprehensive Plan Update Supplemental Environmental Impact Statement (SEIS) evaluated the County's proposed Comprehensive Plan Update and associated changes to development regulations. Several of the County's proposed policies and development regulation amendments were designed to address reasonable measures to provide an efficient use of urban land and direct growth away from rural areas. Reasonable measures were evaluated in Appendix G of the Draft SEIS; a preferred list of measures was included as well in Appendix B of the Final SEIS.

In June 2016 Kitsap County adopted its Comprehensive Plan. Kitsap County is continuing to develop its implementing development regulations including those intended to promote reasonable measures to promote growth in urban areas.

This addendum describes the reasonable measures under consideration in relation to the alternatives considered in the Kitsap County 2016 Comprehensive Plan Update SEIS, and the Comprehensive Plan approved in June 2016. In August 2016, the Board adopted additional reasonable measures – including increased building height allowances and maximum urban lot size in certain zones - along with a resolution directing that measures relating to urban infill incentives, dry sewers and rural legacy lots be further analyzed and considered for adoption by June 2017.

This addendum also provides clarifications and corrections to the Final SEIS that do not substantially change the analysis of significant impacts and alternatives in the Final Supplemental Environmental Impact Statement (SEIS) issued for the Kitsap County 2016 Comprehensive Plan Update in April 2016.

Reasonable Measures

Kitsap County Countywide Planning Policies (2013) indicate each jurisdiction is to implement reasonable measures to support the efficient use of urban lands:

Policies for Urban Growth Areas (UGA). 2. Each jurisdiction is responsible for implementing appropriate reasonable measures within its jurisdictional boundaries. If the Buildable Lands Analysis shows that a jurisdiction's Comprehensive Plan growth goals are not being met, that jurisdiction shall consider implementing additional reasonable measures in order to use its designated urban land more efficiently.

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This section describes the reasonable measures under consideration in 2016-2017 by Kitsap County, the policies of the recently adopted Comprehensive Plan that are fulfilled, and similarity to the SEIS analysis of reasonable measures. All proposed measures would meet Growth Management Act goals to encourage growth in urban areas, reduce sprawl, and offer a greater variety in housing. (RCW 36.70A.020).

The measures would not alter growth targets, but would help Kitsap County achieve the intent of adopted urban land use plan designations and implementing zones designed to provide capacity to achieve the growth targets.

Exhibit 1. Options to Amend the Kitsap County Code to Address Reasonable Measures

#	Topic Title	2016 Comprehensive Plan Policy	Discussion
1.	<p>Dry Sewer Policy KCC 17.410.050 (A)(48) 17.460.020</p>	<p>CapF and Utilities Policy 16. Require urban-level sanitary sewer service or equivalent service in all Urban Growth Areas. Update county-owned and operated sewer facility plans to include, not only capacity demand and needs, but also future major collection or conveyance systems for the 2036 planning horizon (existing and projected).</p> <p>CapF and Utilities Policy 26. Encourage the use of alternative sanitary sewer techniques within Urban Growth Areas, such as package plants, membrane and drip systems and/or community drainfields, in areas where public sewer system may be more than 200 feet away. The use of these alternative sanitary sewer techniques for new development shall also achieve minimum urban densities of the applicable zone.</p>	<p>This measure would allow properties within an Urban Growth Area, that are too far from sewer, to develop with increased densities provided a dry sewer is constructed with a mandatory sewer hook-up agreement to connect once sewer is available.</p> <p>This measure is related to Draft SEIS Appendix G, Section 4.8 Service and Infrastructure Investments in UGAs, including: Allow for and monitor alternative sanitary sewer systems in unincorporated UGAs.</p>
2.	<p>Reduced Regulatory Fees in UGA. Allow use of general funds for permit review when a project achieves the maximum density allowed by the zone.</p> <p>KCC: Commitment only during this code update. Code changes in development.</p>	<p>Land Use Policy 32. Explore the creation of incentives and streamlined administrative processes for new short plats in high priority areas to be identified within the Urban Growth Areas as a Reasonable Measure.</p>	<p>This measure is intended to encourage infill development and increased residential density in Urban Growth Areas. It could help increase densities in the range allowed by the plan and is similar in intent to measures considered in Draft SEIS Appendix G Sections 4.2 Focus Growth Near Transit, Urban Centers, and Urban Villages and 4.7 Reduce Administrative Barriers and Regulatory Requirements.</p>

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#	Topic Title	2016 Comprehensive Plan Policy	Discussion
3.	<p>Tax Incentives for Infill or Redevelopment</p> <p>KCC: Commitment only during this code update. Code changes in development.</p>	<p>Land Use Policy 5. Examine incentives for infill development.</p>	<p>The purpose is to temporarily reduce taxation rate for infill developments. This is similar to the concept behind the following measure addressed in Draft SEIS Appendix G, Section 6.3 Future Urban Measure to Monitor: Multifamily Tax Exemptions.</p>
4.	<p>Minimum Lot Size</p> <p>KCC 17.420.050 (A)</p>	<p>Land Use Policy 29. Through application of Growth Management Act goals, increase density in urban areas and limit sprawl in rural lands.</p>	<p>This measure would use lot averaging calculation method to achieve the minimum lot size in urban residential zoning districts. This would allow efficient use of lots that may differ in shape or critical areas. This is similar to Draft SEIS Appendix G, Mandate minimum densities for new subdivisions, and to Final SEIS Appendix B Minimum / Maximum urban lot size.</p>
5.	<p>Streamline Short Plat Process in UGA</p> <p>KCC: Commitment only during this code update. Code changes in development.</p>	<p>Land Use Policy 32. Explore the creation of incentives and streamlined administrative processes for new short plats in high priority areas to be identified within the Urban Growth Areas as a Reasonable Measure.</p>	<p>This measure would allow use of general funds for permit review when a detached single family dwelling permit requires the subdivision of one parcel into three or less parcels. It could help property owners subdivide properties that may be less likely to convert to urban style development, and is similar in intent to measures considered in Draft SEIS Appendix G Sections 4.2 Focus Growth Near Transit, Urban Centers, and Urban Villages and 4.7 Reduce Administrative Barriers and Regulatory Requirements.</p>
6.	<p>Increased Heights Allowed in UGA</p> <p>KCC 17.420.050 (A) 17.420.060(17)</p>	<p>Land Use Policy 5. Examine incentives for infill development.</p> <p>SRC Policy 5. Allow increased heights and densities and parking requirement reductions as incentives to provide frontage improvements, additional open space, multi-family or affordable housing, rooftop gardens, and energy and environmental design certifications.</p>	<p>The proposal would increase heights in UM and UH zones.</p> <p>Base height UM: 35-45 feet, UH: 35-55 feet</p> <p>With footnote 17 UM: 35-55 feet, UH: 65 feet</p> <p>This is similar to Draft SEIS Appendix G, Section 4.6 Encourage Increased Density and Intensity of Development such as: Increased building height limits through incentives. See also Section 5.0 Summary of Trends where expanding height incentives to other zones was addressed.</p>

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7.	<p>Infrastructure Investment in UGA. Target infrastructure development to support other reasonable measures. For example, combine incentives for building in certain areas of a UGA with increased infrastructure development in the same area.</p> <p>KCC: Coordination with public works TIP and CIP</p>	<p>CapF and Utilities Policy 17. Prioritize the Urban Growth Areas in Kitsap County expenditures for public services and facilities as an incentive to encourage development, to make urban areas desirable places to live and to use existing infrastructure more efficiently and cost effectively.</p>	<p>Similar to Draft SEIS Appendix G, Section 4.8 Service and Infrastructure Investments in UGAs, including Targeted Capital Facilities Investments. See also Section 5.0 Summary of Trends which discusses priorities for infrastructure investments in higher density areas.</p>
8.	<p>Lot Size Averaging in UGA</p> <p>KCC 17.420.050 (A) 17.420.060(19)</p>	<p>Land Use Policy 29. Through application of Growth Management Act goals, increase density in urban areas and limit sprawl in rural lands.</p>	<p>This measure would use lot averaging calculation method to achieve the minimum lot area and dimensions in urban residential zoning districts. This would allow efficient use of lots that may differ in shape or critical areas. This is similar to Draft SEIS Appendix G, Mandate minimum densities for new subdivisions, and to Final SEIS Appendix B Minimum / Maximum urban lot size.</p>
9.	<p>Remove minimum lot widths in UGAs</p> <p>KCC 17.420.050 (A) 17.420.060(19)</p>	<p>Land Use Policy 5. Examine incentives for infill development.</p>	<p>This provision would remove minimum lot widths in urban residential zoning districts to increase flexibility and achieve the densities allowed in the zones. This could help increase the average density of development in zones where added lots become feasible with the removal of the lot width standard. It would be similar to concepts designed to Increase Urban Residential Densities per Section 4.1 of the Reasonable Measures evaluation in Draft SEIS Appendix G.</p>

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#	Topic Title	2016 Comprehensive Plan Policy	Discussion
10.	<p>Transfer of Development Rights</p> <p>KCC: TDR code revised concurrent with Comprehensive Plan update. Board to consider resolution establishing increased ratios in support of code updates.</p>	<p>Land Use Policy 73. Develop and promote incentives for continued rural and resource uses, including but not limited to a Transfer of Development Rights program, an expedited agricultural activity permit review program, and educational and agritourism activities.</p>	<p>This would establish increased ratios and use market based values for Transfer of Development Rights. See Draft SEIS Appendix G, 6.1 Amend Reasonable Measures, Transfer of Development Rights, and Final SEIS Appendix B.</p>
11.	<p>Rural Legacy Lots: Footnote 39</p> <p>KCC 17.420.060 (39)</p>	<p>Land Use Policy 29. Through application of Growth Management Act goals, increase density in urban areas and limit sprawl in rural lands.</p>	<p>Note: The following measure was considered, but is no longer proposed. The Board has directed staff to conduct further analysis of Rural Legacy Lots prior to taking any action on this measure.</p> <p>Building permits are not allowed for rural lots located outside a UGA or designated LAMIRD, created prior to July 1, 1974, less than one acre, contiguous ownership, and no improvements.</p> <p>Similar to Final SEIS Appendix B, Recognition of Rural Legacy Lots, and concepts addressed in Draft SEIS Appendix G Reasonable Measures evaluation, Section 6.2 Consider New Reasonable Measures, Rural Lot Aggregation.</p>
12.	<p>Maximum Urban Lot Size</p> <p>KCC 17.420.050 (A) 17.420.060 (19)</p>	<p>Land Use Policy 29. Through application of Growth Management Act goals, increase density in urban areas and limit sprawl in rural lands.</p>	<p>This measure would establish a 9,000 square foot maximum lot size in Urban Low Residential (ULR) and Urban Cluster Residential (UCR) zones. This is similar to Final SEIS Appendix B Minimum/Maximum Urban Lot Size, and the Maximum Urban Lot Size measure described in Draft SEIS Appendix G Reasonable Measures evaluation, Section 6.2 Consider New Reasonable Measures.</p>

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13.	<p>Urban Medium Residential and Urban High Residential Use Permissibility</p> <p>KCC 17.410.040 (A) 17.410.050(26) 17.410.050(37) 17.410.050(47)</p>	<p>Land Use Policy 29. Through application of Growth Management Act goals, increase density in urban areas and limit sprawl in rural lands.</p>	<p>This measure reinforces the zone intent as an area designated for higher density residential uses and allows for zones to provide the variety in housing type and affordability.</p> <p>The provisions would:</p> <ul style="list-style-type: none"> • Add footnote 26 to limit ability to develop detached single family dwellings. • Modify footnote 37 language and application to require residential uses in conjunction with certain allowed commercial uses. • Modify footnote 47 for consistency with zone intent with regards to commercial and mixed use development. <p>This is similar to the range of measures in Section 4.2 Focus Growth Near Transit, Urban Centers, and Urban Villages, which seeks to encourage transportation-efficient land use and to encourage development of urban centers and villages described in Draft SEIS Appendix G.</p>

Growth Levels, Final Plan June 2016

In June 2016, Kitsap County adopted its Comprehensive Plan Update and allows growth levels in the range of the SEIS alternatives. This section describes the Final Plan and its placement in the range of SEIS alternatives.

Growth targets are adopted by the Countywide Planning Policies (CPPs) for the period 2010-2036. In Exhibit 2 growth targets are presented with a 2012 base year (see Draft and Final SEIS for details). Each growth alternative would represent different patterns and capacities for growth and are compared to the growth targets to determine if they can adequately accommodate growth.

The SEIS Alternatives study the impacts of expected city growth collectively with unincorporated UGA growth. City limit boundaries are not sized in the same way as unincorporated UGAs are sized. Cities may plan for expected growth rather than the full capacity for growth within their city limits. Though city limits are not “sized” under GMA, Kitsap County has considered the sizing of Unincorporated UGAs in light of city capacities. Accordingly, the SEIS Alternatives each have growth assumptions for the cities generally including adopted plan growth assumptions or assuming growth targets plus 5% (see Draft SEIS Appendix B or Final SEIS Appendix A).

The Preferred Alternative studied in the Final SEIS allowed capacity for a countywide growth assumption of 78,493 persons between 2012-2036 considering city limit growth assumptions and unincorporated UGA capacities. The Final Plan added in a land use request and abutting urbanized land in the Silverdale UGA studied under Alternative 3, and slightly modified the population total to be 78,606 persons, a change of 112 people. Because the Silverdale UGA as analyzed in the Preferred Alternative had excess capacity for 82 people, this addition resulted in a slight overage (30 people) to the Silverdale UGA, which is less than 1% over the target population. Countywide, population growth assumptions would be 2% above of CPP growth targets as noted for the Preferred Alternative. Attached hereto as Attachment A are revised land capacity analysis worksheets for the Silverdale UGA.

Regarding employment, a commercial interchange area in the Port Orchard Urban Growth Area (UGA) under Alternative 1 was retained in the Final Plan, whereas it was excluded in the Preferred Alternative. Under the Preferred Alternative, employment growth capacity was anticipated at 52,409 countywide, whereas it is 52,594 with the Final Plan. Employment growth capacity would be 13% above CPP growth targets rather than 12% identified with the Preferred Alternative.

See Exhibit 2. Final Plan Growth Capacities. Also see Final SEIS Appendix A with a method for growth distribution across the county.

Exhibit 2. Final Plan Growth Capacities

City or UGA	Adjusted Population Growth Target 2012-2036	Final Plan Population Growth Capacity	Difference with Population Target	Adjusted Employment Growth Target 2012-2036	Final Plan Employment Growth Capacity	Difference with Employment Target
City of Bremerton	12,367	13,757	1,390	18,276	21,191	2,915
Bremerton UGA	3,972	4,028	56	1,443	1,689	246
Total Bremerton	16,339	17,785	1,446	19,719	22,880	3,161

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City of Bainbridge Island	5,570	5,849	279	2,720	2,856	136
City of Port Orchard	8,778	10,358	1,580	3,074	5,570	2,496
Port Orchard UGA	6,110	4,600	(1,510)	1,140	1,377	237
Total Port Orchard	14,888	14,958	70	4,214	6,947	2,733
City of Poulsbo	1,192	5,227	249	4,138	4,345	207
Poulsbo UGA	3,786	See above*		14	64	50
Total Poulsbo	4,978	5,227	249	4,152	4,409	257
Central Kitsap UGA	6,842	6,375	(467)	1,885	1,793	(92)
Silverdale UGA	8,723	8,753	30	8,928	8,592	(336)
Kingston UGA	2,926	2,854	(72)	597	685	88
Total City	27,907	35,191	3,498	28,208	33,962	5,754
Unincorporated UGA	32,359	26,610	(1,963)	14,007	14,200	193
Total City and UGA	60,266	61,801	1,535	42,215	48,161	5,946
Rural Non-UGA	16,805	16,805	0	4,432	4,432	0
Total	77,071	78,606	1,535	46,647	52,594	5,947

Notes: See Final SEIS Appendix A for information on city assumptions.

*The Poulsbo unincorporated and incorporated UGAs were treated as a single unit based on joint planning and the small size of the unincorporated UGA.

Source: Kitsap County Community Development Department; BERK Consulting 2015

Counties are required to size unincorporated UGAs to accommodate growth that is planned; they should be sized to promote urban patterns of development with appropriate urban services and to avoid sprawl. Unincorporated UGAs are evaluated based on growth capacity in Exhibit 3. The Final Plan shows that collectively the unincorporated UGAs would be below population targets by 5-7%, similar to the Preferred Alternative, and within 1% of for employment capacity and targets, slightly higher than the Preferred Alternative.

Exhibit 3. Final Plan Unincorporated UGA Capacities and Target

Unincorporated UGA	Adjusted Pop. Growth Target 2012-2036	Final Plan Population Growth Capacity	Difference with Population Target	% Diff. Population Target	Adjusted Emp. Growth Target 2012-2036	Preferred Alternative Emp. Growth Capacity	Difference with Emp. Target	% Diff. Emp. Target
Bremerton	3,972	4,028	56	1%	1,443	1,689	246	17%
Port Orchard	6,110	4,600	(1,510)	-25%	1,140	1,377	237	21%
Poulsbo City + UGA	4,978	5,227	249	5%				
Poulsbo UGA only					14	64	50	355%
Central Kitsap	6,842	6,375	(467)	-7%	1,885	1,793	(92)	-5%
Silverdale	8,723	8,753	30	0%	8,928	8,592	(336)	-4%
Kingston	2,926	2,854	(72)	-2%	597	685	88	15%
Total excl. Poulsbo	28,573	26,610	(1963)	-7%	N/A	N/A	N/A	N/A
Total with Poulsbo	33,551	31,837	(1,714)	-5%	14,007	14,200	193	1%

Source: Kitsap County Community Development Department; BERK Consulting 2015

Comparing the Final Plan to the SEIS Alternatives, UGAs countywide have capacity comparable to Alternative 3, the maximum studied, and the unincorporated UGA population capacity is very close to the Preferred Alternative. In terms of employment the Final Plan provides less capacity than Alternatives 1 and 2 (the latter was the maximum studied), both at the countywide and unincorporated UGA scales. The Final Plan employment growth is similar to Alternative 2 and the Preferred Alternative. At a countywide level UGA boundaries under the Final Plan would be more similar to Alternative 2 and the Preferred Alternative. See Exhibit 4.

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Exhibit 4. Comparison of Alternative Growth Assumptions

Topic	Alternative 1 No Action	Alternative 2 Whole Community	Alternative 3 All Inclusive	Preferred Alternative	Final Plan
Growth					
Countywide Population 2036 Assumptions	329,923	331,550	333,076	332,993	333,053
Countywide Population Growth Targets 2012-2036	77,071	77,071	77,071	77,071	77,071
Countywide Population Growth 2012-2036	75,423	77,050	78,576	78,493	78,606
Unincorporated UGA Targets 2012-2036 (range with and without the combined Poulsbo city limits and UGA)	33,551 28,573	33,551 28,573	33,551 28,573	33,551 28,573	33,551 28,573
Unincorporated UGA Population Capacity	29,630	31,053 25,826	32,579 27,353	31,725 26,498	31,837 26,610
Unincorporated UGA Population Capacity % within Target (range with and without the combined Poulsbo city limits and UGA)	-11%	-7 to -10%	-3 to -4%	-5 to -7%	-5 to -7%
Countywide Employment 2036 Assumptions	129,760	134,425	131,980	131,987	132,171
Countywide Employment Growth Targets 2012-2036	46,647	46,647	46,647	46,647	46,647
Countywide Employment Growth 2013-2036	50,182	54,847	52,402	52,409	52,593
Unincorporated UGA Targets 2012-2036	14,007	14,007	14,007	14,007	14,007
Unincorporated UGA Employment Capacity	15,719	16,453	14,008	14,015	14,200
UGA Employment Capacity % within Target	12%	17%	0%	0%	1%
Unincorporated UGAs					
UGAs with Areas of Expansion	None	Silverdale, West Bremerton	Kingston, Silverdale, Central Kitsap, West Bremerton	Kingston, Silverdale, Central Kitsap, West Bremerton	Kingston, Silverdale, Central Kitsap, West Bremerton
UGAs with Areas of Reduction	None	Central Kitsap, East Bremerton, Port Orchard	Central Kitsap, East Bremerton, Port Orchard	Silverdale, Port Orchard	Silverdale, Port Orchard

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Topic	Alternative 1 No Action	Alternative 2 Whole Community	Alternative 3 All Inclusive	Preferred Alternative	Final Plan
Total UGA Acres*	18,949	18,167	19,703	18,745	18,962
Plans and Policies					
Comprehensive Plan Goals, Policies and Strategies Updated		X	X	X	X
Future Land Use Plan and Zoning Amended		X	X	X	X
Subarea, LAMIRD and Community Plan goals and policies Updated		X	X	X	X
Silverdale RGC Plan Alternatives		X	X	X	X
Capital Facility Plan Updated		X	X	X	X

Note: *Includes areas of parcels and roads and excludes water.

Source: Kitsap County Community Development; BERK Consulting 2015

A table summarizing the acres of each UGA under each alternative is also provided below. Areas of expansion and reduction in individual locations vary between Alternatives.

- Kingston would have no change under Alternative 2 and an increase under Alternative 3, the Preferred Alternative, and the Final Plan.
- Poulsbo UGA would not change under any alternative.
- The amount of the Silverdale UGA expansion varies from 25 to 705 acres under Alternatives 2 and 3 respectively. The Preferred Alternative would reduce the UGA by a net 61 acres and the Final Plan would increase it by 138 acres, although much of that includes an already developed area that has urban services in the Chico area.
- Central Kitsap would be reduced under Alternative 2 and increased under Alternative 3, the Preferred Alternative, and the Final Plan.
- The West Bremerton portion of the Bremerton UGA would be increased and the East Bremerton portion reduced for a net increase in the total Bremerton UGA under both Alternatives 2 and 3. The Preferred Alternative and the Final Plan would maintain East Bremerton UGA boundaries, and expand West Bremerton UGA boundaries though primarily for city watershed purposes.
- The Port Orchard UGA would be reduced under Alternatives 2 and 3, as well as the Preferred Alternative and Final Plan.

As described by alternative and in the comparison chart in Exhibit 5, Alternative 1 represents the status quo. Alternative 2 would reduce UGA acres overall by 4% while Alternative 3 would increase UGA acres by 4%. The Preferred Alternative would reduce UGA acres overall by 1%. The Final Plan would change UGA boundaries by less than 1% compared to No Action. However, it should be noted that Alternative 3 and the Final Plan included nearly 500 acres of city-owned watershed into the Bremerton UGA for municipal purposes and not for growth. If that area were excluded, Alternative 3 would increase the UGA territory by 1% and the Final Plan would reduce it by over 2% compared to Alternative 1.

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Exhibit 5. Unincorporated UGA Acres by Alternative

UGA	Alternative 1	Alternative 2	Alternative 3	Preferred	Final Plan	Difference Alt 2 - Alt 1	Difference Alt 3 - Alt 1	Difference Preferred - Alt 1	Difference Final - Alt 1
Bremerton	2,563	2,815	2,815	3,058	3,058	252	252	495	495
Bremerton East UGA	1,141	900	900	1,141	1,141	(241)	(241)	0	0
Bremerton West UGA	1,094	1,587	1,587	1,591	1,591	493	493	496	496
Gorst UGA	328	328	328	328	328	0	0	0	0
Central Kitsap UGA	5,562	5,406	5,967	5,582	5,582	(156)	405	20	20
Kingston UGA	1,070	1,070	1,212	1,145	1,145	0	142	75	75
Port Orchard UGA	3,810	2,907	3,059	3,077	3,094	(904)	(751)	(734)	(717)
Poulsbo UTA	428	428	428	428	428	0	0	0	0
Silverdale	5,516	5,541	6,221	5,455	5,654	25	705	(61)	138
TOTAL	18,949	18,167	19,702	18,745	18,961	(783)	753	(205)	11

Source: Kitsap County GIS; BERK Consulting 2015

Because UGA capacity analysis is at a planning level, Kitsap County has established a margin of error of 5%. UGA land capacity results within +/-5% of the growth allocation are considered in balance. Reviewing the capacities of the unincorporated UGAs using standard assumptions for land capacity, the unincorporated UGAs are within -5% of the population target and just 1% above employment targets. Thus, regarding UGA sizing, the Final Plan is sized within planning tolerances.

¹ See the three documents where the margin of tolerance is discussed: 1. Kitsap County 10-Year Comprehensive Plan Update – Integrated Plan and Environmental Impact Statement (EIS), Volume II: Final EIS, December 2006. 2. Kitsap County Urban Growth Area (UGA) Sizing and Composition Remand, Final Supplemental EIS, August 10, 2012. 3. Kitsap County 2016 Comprehensive Plan Update, Final Supplemental EIS, April 2016.

²The Growth Management Hearings Board has recognized that “it is an unrealistic expectation of any county, in creating the right combination of parcel sizes to accommodate the allocated population that every UGA must be exactly the right size (not too large and not too small) to accommodate only the number of people allocated to it.” *Stalheim et al. v. Whatcom County*, WWGMHB No. 10-2-0016c, FDO (4/11/2011).

Update Clarifications and Corrections

This section provides some clarifications and corrections to the Final SEIS that do not change the programmatic analysis of the studied alternatives or the relative difference among alternatives.

Amend final paragraph on page 2-30 to reference the Preferred Alternative rather than Alternative 2.

Unincorporated UGAs are evaluated based on growth capacity in Exhibit 2.6-20. ~~The Preferred Alternative shows that UGAs would be below population targets by 5-6% and essentially in balance for employment capacity and targets. Under Alternative 2, the unincorporated UGAs would be below population targets by 7% and above employment targets by about 17%. However, because Silverdale’s employment growth is essentially occurring in present UGA boundaries (with a less than 1% UGA change for industrial lands), growth would largely occur in the existing urban footprint of the Silverdale RGC. If the Silverdale employment growth is excluded, the percentage above employment targets across the County would drop to 3%.~~

Amend the second paragraph under Section 3.2.2.1 on page 3-8 to identify the employment capacity of the Preferred Alternative rather than Alternative 2.

Countywide, Alternative 2 assumes employment growth above targets by ~~1812%~~, as described in Chapter 2. Unincorporated UGA employment capacity would be ~~17% above~~ within balance of the target requirements for these areas. ~~Much of the greater supply in employment is based on an intensification of retail and office uses in the Silverdale RGC. If that employment were reduced to a more moderate level, the employment levels would be within 5% of the target for UGAs and considered in balance within a reasonable margin of tolerance.~~

Amend Exhibit 3.3-34 on page 3-38 to address more current sewer capital costs included in the Bremerton Comprehensive Plan, 2016.

Exhibit 3.3-34 Sewer Cost Comparison by Provider and Alternative 2016-2036 (All Amounts in \$1,000)

UGA	No Action	Alternative 2	Alternative 3	Preferred Alternative
Bremerton (City)	\$334,969 \$304,633	\$334,969 \$304,633	\$334,969 \$304,633	\$334,969 \$304,633
Port Orchard (City)	\$7,470	\$7,470	\$7,470	\$7,470
WSUD*	\$31,685	\$27,085	\$27,085	\$27,835
Poulsbo (City)	\$11,655	\$11,655	\$11,655	\$11,655
Kitsap County	\$338,404	\$333,004	\$354,004	\$341,263

Note: *WSUD confirmed Capital Facility Plan estimates for No Action and Alternatives 2 and 3, and these are reflected in the table with a similar relative difference. The Preferred Alternative adds one pump station in the District’s Capital Facility Plan on Bethel Road SE as it is retained in the UGA compared to Alternatives 2 and 3.

Source: WSUD 2015; BHC 2015 and 2016

ATTACHMENT A: Revised Land Capacity Analysis Worksheets

SILVERDALE
URBAN GROWTH AREA
Land Capacity -Final

UNDERUTILIZED LANDS	URBAN LOW 6.0 DU/AC	SENIOR LIVING HOMESTEAD 6.0 DU/AC	URBAN MEDIUM 12 DU/AC	URBAN HIGH 21.75 DU/AC	URBAN RESTRICTED 2.5 DU/AC	URBAN CLUSTER 7.6 DU/AC	GREENBELT 2 DU/AC	REGIONAL CENTER 10 DU/AC	GRAND TOTAL
Gross Residential Acres (Developed Parcels only)									
Total Gross Acres	1967.59	0.00	89.35	186.32	201.47	0.00	0.00	0.00	2444.73
Multi - Family Dwelling (-)	44.75	0.00	25.64	80.04	5.99	0.00	0.00	0.00	156.42
Parcels < 0.50 Acres (-)	740.52	0.00	27.48	35.90	6.57	0.00	0.00	0.00	810.47
Public/Current Use/Utilities (-)	516.91	0.00	18.63	42.67	52.82	0.00	0.00	0.00	631.03
Shoreline Parcel < 1.00 Acre (-)	0.82	0.00	0.00	0.00	2.38	0.00	0.00	0.00	3.20
Subtotal	664.59	0.00	17.60	27.71	133.71	0.00	0.00	0.00	843.61
Redevelopable Acres									
<i>Median Value \$159712</i>									
Density < 2.5 (-)	49.77	0.00	0.00	0.00	44.41	0.00	0.00	0.00	94.18
Density >= 2.5 - < 4.00 Value > (-)	123.00	0.00	0.00	0.00	6.21	0.00	0.00	0.00	129.21
Density >= 4.0 - < 5.00 Value > (-)	142.32	0.00	0.00	0.00	7.11	0.00	0.00	0.00	149.43
Density >= 5.0 - < 10.00 Value > (-)	34.57	0.00	0.00	0.00	6.40	0.00	0.00	0.00	40.97
Subtotal	314.93	0.00	17.60	27.71	69.58	0.00	0.00	0.00	429.82
Remove 100% of Platted lots (acres)	69.14	0.00	0.00	1.35	0.00	0.00	0.00	0.00	70.49
Critical Areas									
Total Redevelopable Acres	245.79	0.00	17.60	26.36	69.58	0.00	0.00	0.00	359.33
Unencumbered Acres	201.78	0.00	16.02	19.80	37.72	0.00	0.00	0.00	275.32
Acres within Critical Areas	32.92	0.00	1.57	0.52	27.25	0.00	0.00	0.00	62.26
Critical Areas reduction 75% (-)	8.23	0.00	0.39	0.13	6.81	0.00	0.00	0.00	15.57
Acres within Area of Concern	11.06	0.00	0.00	6.03	4.59	0.00	0.00	0.00	21.68
Area of Concern reduction 50% (-)	5.53	0.00	0.00	3.02	2.30	0.00	0.00	0.00	10.84
Subtotal	215.54	0.00	16.41	22.95	46.83	0.00	0.00	0.00	301.73
Roads/Right-of-Way (Future)									
20% (-)	172.43	0.00	13.13	18.36	37.46	0.00	0.00	0.00	241.38
Public Facility (Future)									
20% (-)	137.95	0.00	10.50	14.68	29.97	0.00	0.00	0.00	193.10
Unavailable Lands									
15% (-)	117.25	0.00	8.93	12.48	25.47	0.00	0.00	0.00	164.14
Commercial Split									
50% (-)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Platted Lots									
Underutilized Platted Lots 25% (+)	17.29	0.00	0.00	0.34	0.00	0.00	0.00	0.00	17.62
Platted Lot existing dwelling unit (count)	46	0	0	2	0	0	0	0	48
Dwelling Unit count (-75%)	12	0	0	1	0	0	0	0	12
Existing Dwelling Units									
Existing Dwelling Units (non platted lots) (-)	141	0	14	25	22	0	0	0	202
Total Dwelling Units (-)	153	0	14	26	22	0	0	0	214
TOTALS									
Net Developable Acres	134.54	0.00	8.93	12.82	25.47	0.00	0.00	0.00	181.76
	6.0 DU/AC	6.0 DU/AC	12 DU/AC	21.75 DU/AC	2.5 DU/AC	7.6 DU/AC	2 DU/AC	10 DU/AC	
Dwelling Unit Capacity	655	0	93	253	42	0	0	0	1043
	2.5 pph	1.8 pph	2.5 pph	1.8 pph	2.5 pph	2.5 pph	2.5 pph	1.8 pph	
Population Capacity	1637	0	233	456	104	0	0	0	2430

SILVERDALE
URBAN GROWTH AREA
Land Capacity - Final

VACANT LAND	URBAN LOW <i>6.0 DU/AC</i>	SENIOR LIVING HOMESTEAD <i>6.0 DU/AC</i>	URBAN MEDIUM <i>12 DU/AC</i>	URBAN HIGH <i>21.75 DU/AC</i>	URBAN RESTRICTED <i>2.5 DU/AC</i>	URBAN CLUSTER <i>7.6 DU/AC</i>	GREENBELT <i>2 DU/AC</i>	REGIONAL CENTER <i>10 DU/AC</i>	GRAND TOTAL
Gross Residential Zoned Acres									
Total Gross Vacant Acres	392.48	0.00	64.41	14.86	98.08	0.00	0.00	0.00	569.83
Subtotal	392.48	0.00	64.41	14.86	98.08	0.00	0.00	0.00	569.83
Redevelopable Acres									
Subtotal	392.48	0.00	64.41	14.86	98.08	0.00	0.00	0.00	569.83
Vacant Platted Lots (-)	34.72	0.00	3.87	0.50	0.00	0.00	0.00	0.00	39.09
Critical Areas									
Total Redevelopable Acres	357.76	0.00	60.54	14.36	98.08	0.00	0.00	0.00	530.74
Unencumbered Acres	299.08	0.00	45.50	5.33	23.49	0.00	0.00	0.00	373.40
Acres within Critical Areas	20.45	0.00	8.33	2.50	54.89	0.00	0.00	0.00	86.17
Critical Areas reduction 75% (-)	5.11	0.00	2.08	0.63	13.72	0.00	0.00	0.00	21.54
Acres within Area of Concern	38.23	0.00	6.69	6.53	19.69	0.00	0.00	0.00	71.14
Area of Concern reduction 50% (-)	19.12	0.00	3.35	3.27	9.85	0.00	0.00	0.00	35.57
Subtotal	323.31	0.00	50.93	9.22	47.06	0.00	0.00	0.00	430.51
Roads/Right-of-Way (Future)									
20% (-)	258.65	0.00	40.74	7.38	37.65	0.00	0.00	0.00	344.41
Public Facility (Future)									
20% (-)	206.92	0.00	32.59	5.90	30.12	0.00	0.00	0.00	275.53
Unavailable Lands									
5% (-)	196.57	0.00	30.96	5.61	28.61	0.00	0.00	0.00	261.75
Commercial Split									
50% (-)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Platted Lots									
Vacant Platted Lots	298	0	40	2	0	0	0	0	340
Net Developable Acres									
	196.57	0.00	30.96	5.61	28.61	0.00	0.00	0.00	261.75
	<i>6.0 DU/AC</i>	<i>6.0 DU/AC</i>	<i>12 DU/AC</i>	<i>21.75 DU/AC</i>	<i>2.5 DU/AC</i>	<i>7.6 DU/AC</i>	<i>2 DU/AC</i>	<i>10 DU/AC</i>	
Dwelling Unit Capacity	1477	0	412	124	72	0	0	666	2750
	<i>2.5 pph</i>	<i>1.8 pph</i>	<i>2.5 pph</i>	<i>1.8 pph</i>	<i>2.5 pph</i>	<i>2.5 pph</i>	<i>2.5 pph</i>	<i>1.8 pph</i>	
Population Capacity	3694	0	1029	223	179	0	0	1199	6323

SILVERDALE
URBAN GROWTH AREA
Land Capacity - Final

UNDERUTILIZED LANDS	URBAN LOW <i>6.0 DU/AC</i>	SENIOR LIVING HOMESTEAD <i>6.0 DU/AC</i>	URBAN MEDIUM <i>12 DU/AC</i>	URBAN HIGH <i>21.75 DU/AC</i>	URBAN RESTRICTED <i>2.5 DU/AC</i>	URBAN CLUSTER <i>7.6 DU/AC</i>	GREENBELT <i>2 DU/AC</i>	REGIONAL CENTER <i>12 DU/AC</i>	GRAND TOTAL
Net Developable Acres	134.54	0.00	8.93	12.82	25.47	0.00	0.00	0.00	181.76
Dwelling Unit Capacity	655	0	93	253	42	0	0	0	1043
	<i>2.5 pph</i>	<i>1.8 pph</i>	<i>2.5 pph</i>	<i>1.8 pph</i>	<i>2.5 pph</i>	<i>2.5 pph</i>	<i>2.5 pph</i>	<i>1.8 pph</i>	
Population Capacity	1637	0	233	456	104	0	0	0	2430

VACANT LAND	URBAN LOW <i>6.0 DU/AC</i>	SENIOR LIVING HOMESTEAD <i>6.0 DU/AC</i>	URBAN MEDIUM <i>12 DU/AC</i>	URBAN HIGH <i>21.75 DU/AC</i>	URBAN RESTRICTED <i>2.5 DU/AC</i>	URBAN CLUSTER <i>7.6 DU/AC</i>	GREENBELT <i>2 DU/AC</i>	REGIONAL CENTER <i>12 DU/AC</i>	GRAND TOTAL
Net Developable Acres	196.57	0.00	30.96	5.61	28.61	0.00	0.00	0.00	261.75
Dwelling Unit Capacity	1477	0	412	124	72	0	0	666	2750
	<i>2.5 pph</i>	<i>1.8 pph</i>	<i>2.5 pph</i>	<i>1.8 pph</i>	<i>2.5 pph</i>	<i>2.5 pph</i>	<i>2.5 pph</i>	<i>1.8 pph</i>	
Population Capacity	3694	0	1029	223	179	0	0	1199	6323

GRAND TOTAL	URBAN LOW <i>6.0 DU/AC</i>	SENIOR LIVING HOMESTEAD <i>6.0 DU/AC</i>	URBAN MEDIUM <i>12 DU/AC</i>	URBAN HIGH <i>21.75 DU/AC</i>	URBAN RESTRICTED <i>2.5 DU/AC</i>	URBAN CLUSTER <i>7.6 DU/AC</i>	GREENBELT <i>2 DU/AC</i>	REGIONAL CENTER <i>12 DU/AC</i>	GRAND TOTAL
Net Developable Acres	331.11	0.00	39.89	18.43	54.09	0.00	0.00	0.00	443.51
Dwelling Unit Capacity	2132	0	505	377	113	0	0	666	3793
	<i>2.5 pph</i>	<i>1.8 pph</i>	<i>2.5 pph</i>	<i>1.8 pph</i>	<i>2.5 pph</i>	<i>2.5 pph</i>	<i>2.5 pph</i>	<i>1.8 pph</i>	
Population Capacity	5330	0	1262	679	283	0	0	1199	8753

SILVERDALE
URBAN GROWTH AREA
Commercial Land Capacity
Final

UNDERUTILIZED LANDS	INDUSTRIAL	BUSINESS CENTER	BUSINESS PARK	NEIGHBORHOOD COMMERCIAL	COMMERCIAL	REGIONAL CENTER	URBAN VILLAGE CENTER	GRAND TOTAL
Gross Acres (Developed Parcels only)							See Residential Sheet for split	
Total Gross Acres	373.86	27.46	4.76	41.46	166.63	523.14	0.00	1137.31
Multi - Family Dwelling (-)	12.80	0.00	0.00	4.20	0.00	40.13	0.00	57.13
Public/Current Use/Utilities (-)	278.43	11.53	4.76	31.63	55.82	431.56	0.00	813.73
Subtotal	82.63	15.93	0.00	5.63	110.81	51.45	0.00	266.45
Remove 100% Planned Lots	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Remove 100% Platted	10.65	0.00	0.00	3.63	1.39	3.77	0.00	19.44
Subtotal	71.98	15.93	0.00	2.00	109.42	47.68	0.00	247.01
Critical Areas								
Total Redevelopable Acres	71.98	15.93	0.00	2.00	109.42	47.68	0.00	247.01
Unencumbered Acres	41.00	4.75	0.00	1.54	59.47	31.81	0.00	138.57
Acres within Critical Areas	21.24	5.06	0.00	0.11	25.12	15.18	0.00	66.71
Critical Areas reduction 75% (-)	5.31	1.27	0.00	0.03	6.28	3.80	0.00	16.68
Acres within Area of Concern	9.73	6.11	0.00	0.33	24.82	0.66	0.00	41.65
Area of Concern reduction 50% (-)	4.87	3.06	0.00	0.17	12.41	0.33	0.00	20.83
Subtotal	51.18	9.07	0.00	1.73	78.16	35.94	0.00	176.07
Roads/Right-of-Way (Future)								
20% (-)	40.94	7.26	0.00	1.39	62.53	28.75	0.00	140.86
Public Facility (Future)								
20% (-)	32.75	5.80	0.00	1.11	50.02	23.00	0.00	112.69
Unavailable Lands								
25% (-)	24.56	4.35	0.00	0.83	37.52	17.25	0.00	84.51
Underutilized Acres	35.21	4.35	0.00	4.46	38.91	21.02	0.00	103.95
VACANT LAND								
Gross Acres							See Residential Sheet for split	
Total Gross Acres	260.41	19.58	0.00	1.08	82.46	37.50	0.00	401.03
Remove 100% Planned Development	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Remove 100% Platted Lots	15.91	0.00	0.00	1.08	0.00	3.01	0.00	20.00
Subtotal	244.50	19.58	0.00	0.00	82.46	34.49	0.00	381.03
Critical Areas								
Total Redevelopable Acres	244.50	19.58	0.00	0.00	82.46	34.49	0.00	381.03
Unencumbered Acres	149.29	14.78	0.00	0.00	49.12	23.26	0.00	236.45
Acres within Critical Areas	26.56	0.53	0.00	0.00	21.28	11.22	0.00	59.59
Critical Areas reduction 75% (-)	6.64	0.13	0.00	0.00	5.32	2.81	0.00	14.90
Acres within Area of Concern	68.64	4.27	0.00	0.00	12.06	0.00	0.00	84.97
Area of Concern reduction 50% (-)	34.32	2.14	0.00	0.00	6.03	0.00	0.00	42.49
Subtotal	190.25	17.05	0.00	0.00	60.47	26.07	0.00	293.83
Roads/Right-of-Way (Future)								
20% (-)	152.20	13.64	0.00	0.00	48.38	20.85	0.00	235.07
Public Facility (Future)								
20% (-)	121.76	10.91	0.00	0.00	38.70	16.68	0.00	188.05
Unavailable Lands								
20% (-)	97.41	8.73	0.00	0.00	30.96	13.35	0.00	150.44
Vacant Acres	113.32	8.73	0.00	1.08	30.96	16.36	0.00	170.44
							37.37	
Total Net Developable Acres	148.53	13.08	0.00	5.54	69.87	46.72	0.00	283.74
Total Square Footage Planned Developments	36300	0	0	0	0	36629	0	72929

SILVERDALE
URBAN GROWTH AREA
Employment Capacity
Final

	INDUSTRIAL	BUSINESS CENTER	BUSINESS PARK	NEIGHBORHOOD COMMERCIAL	COMMERCIAL	REGIONAL CENTER	URBAN VILLAGE CENTER	GRAND TOTAL
Underutilized Acres	35.21	4.35	0.00	4.46	38.91	26.27	0.00	109.21
Vacant Acres	113.32	8.73	0.00	1.08	30.96	20.44	0.00	174.53
Total Net Developable Acres	148.53	13.08	0.00	5.54	69.87	46.71	0.00	283.74
Underutilized Square Feet	1533922	189643	0	194347	1694780	1144321	0	4757013
Vacant Square Feet	4936132	380206	0	47045	1348645	890541	0	7602569
Total Square Feet	6470054	569848	0	241392	3043426	2034862	0	12359582
Conversion to Building Square Footage								
Conversion to Building Square Footage								
Industrial (38%) underutilized	582890	72064	0					654955
Industrial (38%) vacant supply	1875730	144478	0					2020208
Industrial Planned lots	36300	0	0					36300
<i>Subtotal (vacant)</i>	<i>1912030</i>	<i>144478</i>	<i>0</i>					<i>2056508</i>
Total	2494920	216542	0					2711463
Commercial (32%) underutilized				62191	542330	1144321	0	1748842
Commercial (32%) vacant supply				15054	431567	890541	0	1337162
Commercial Planned lots				0	0	36629	0	36629
<i>Subtotal (vacant)</i>				<i>15054</i>	<i>431567</i>	<i>927170</i>	<i>0</i>	<i>1373791</i>
Total				77245	973896	2071491	0	3122633
Total Building Square Footage	2494920	216542	0	77245	973896	2071491	0	5834095

SILVERDALE
 URBAN GROWTH AREA
 Resulting Jobs
 Final

	Industrial Zones	Commercial Zones	TOTAL
Net Developable Acres	161.61	122.12	283.74
Building Area Estimates (Square Footage)	2,711,462.89	3,122,632.53	5,834,095.43
Vacancy Rate Adjustment (5%)	2,575,889.75	2,966,500.90	5,542,390.65
Employment Rate - Square Feet Per Employee	969	500	
Resulting Employment Capacity - Jobs	2658	5933	8592