

November 5, 2025

TO: Kitsap Board of County Commissioners
FROM: Kitsap Environmental Coalition (KEC)
RE: Comments on Kitsap County Year of the Rural Documents for BOCC Public Hearing

The Kitsap Environmental Coalition (KEC), as a key stakeholder, has carefully reviewed the draft *Rural and Resource Lands (R&RL) Chapter* and the *Reclassification Requests Staff Report*, with particular attention to environmental considerations.

We thank Heather Cleveland for her leadership in organizing the County's outreach, which has enabled community participation in this critical process. Below are KEC's overarching comments and recommendations.

Rural and Resource Lands (R&RL) Chapter. We appreciate the Planning Commission's additions to the R&RL chapter in response to public input (Goal 17; Policy 13.5; and Strategy 12.a). We build on their work with important enhancements that can significantly strengthen environmental protection, climate resilience, and sustainability in Kitsap County.

1. **Wildlife corridors and habitat connectivity:** In addition to the inclusion of Goal 17 to address wildlife corridors and habitat connectivity, we urge careful consideration of the differing needs of species and the complexities of maintaining functional corridors.
2. **Protect Critical Areas:** We urge the following enhancements to support the Critical Areas Ordinance.
 - a. **Wetlands and stream protection:** Update County mapping of wetlands and streams to include their protective buffers – as the City of Poulsbo has done with their mapping of [fish-bearing stream buffers](#). Display of buffers on the Parcel Search tool would accurately inform prospective builders of CAO restrictions. Such maps also help correlation of wildlife corridors.
 - b. **Water quality and quantity:** The new Policy 13.5, which calls for identifying and protecting natural areas contributing to aquifer recharge, is essential to safeguarding both water quality and water quantity. *Recommendation:* Revise the *Rural Character Definition* to reference both water quality and quantity, as the current language includes only water quality.
3. **Nonmotorized transportation (Strategy 12.a):** We commend the greater attention to safe nonmotorized travel in rural areas (Strategy 12.a) and recommend an added emphasis on connecting communities to promote accessibility, safety, and social cohesion.
4. **Support local agriculture:** Establish and maintain a strong Agricultural Advisory Council to advise the County on policies and codes that include ensuring a resilient local food system in the face of changing climate conditions. (Note that we have not submitted comments

on Agricultural Codes, as we believe it is first essential to establish an Agricultural Advisory Council, which should then play a central role in code development and revisions.)

5. **Support best available science use:** Promote forestry and agricultural practices grounded in Best Available Science, that support long-term land and forest health and climate resilience.

Reclassification Requests. KEC reviewed the Staff Report on the three reclassification requests with focus on environmental impacts, legal mandates, and consistency with the Kitsap County Code (KCC). We considered factors including past permit denials, public input, and the multiple criteria required under two KCC sections.

While we recognize that reclassifications may sometimes be appropriate, the County Code requires that all criteria be met—a standard these requests do not fulfill. The burden of proof lies with the applicant and they have not met that burden of proof. Thus, we oppose the proposed reclassification requests. *See Attachment A* for details on our analysis.

We also recommend the BOCC:

1. **Establish Clear Guidance for Future Applications**

Require applicants to address environmental conditions explicitly and demonstrate full compliance with the Critical Areas Ordinance.

2. **Ensure Transparency and Public Engagement**

Announce the next application period for rezone and land designation requests well in advance to allow meaningful public participation.

We appreciate the Planning Commission's dedication to the Year of the Rural review, though we note their limited time and data hindered a thorough evaluation of the reclassification requests.

Implementation and Ongoing Review. Once the R&RL Chapter is adopted, we urge the BOCC and relevant departments to conduct regular, transparent reviews of the chapter's implementation. Turning goals and policies into real-world outcomes requires consistent monitoring, public reporting, and adaptive management.

Sincerely,

KEC Board: Martha Burke, Bob Gilby, David Onstad, Beverly Parsons, Russ Sciandra, Dave Shorett

KEC Year of the Rural Working Group: Marion Allen, Martha Burke, Joe Forsthoffer, Joe Lubischer, Beth Nichols, Doug Hayman, Paul Larson, Beverly Parsons, Carol Price, April Ryan, Robin Salthouse, Dave Shorett, Margaret Tufft, Pat Weagant, Steve Weagant



Attachment A: KEC's Key Considerations about Reclassification Requests

Condition	A. APP-ID: 07 Skrobut-McCormick Lands CO	B. App-ID: 57 Moran	C. App-ID: 66 Stokes/Campbell
Current vs. Proposed Zoning	RW to RI or RCO	RR to RI	RP to Rural Commercial
Code Violations or Record of Denied Permits	None	Yes, code violations for same owner in adjacent property	Yes, reclassifications requests denied in 2006, 2009, and 2015
Public Comment	1 comment. Concern about proximity to Coulter Creek Heritage Park and potential impacts on nearby recreation, habitat, and rural character; unmet need not demonstrated	2 comments. Concerns about code compliance and land use compatibility. Would reclassification reward non-compliant behavior? Presence of wetlands, erosion hazards, and other critical areas making property unsuitable for industrial use. Strong preference for maintaining existing designation and ensuring compliance issues are resolved before any rezone consideration	3 comments. Environmental constraints. Overall strong opposition based on environmental and policy consistency groups
General Criteria KCC 21.08.07.A 3 criteria	General Criterion #1 not met: no change in conditions since 2024 and 2016 Comp Plan to justify zoning change	General Criterion #1 not met: no change in conditions since 2024 and 2016 Comp Plan to justify zoning change	General Criterion #3 not met: encumbered by critical areas and buffers; reclassification would lead to incompatible adjacent land uses and encourage other nearby properties to request conversion
Site Specific criteria KCC 21.08.07.D 6-7 criteria	No existing unmet need established (Specific criterion a)	Site is significantly encumbered by critical areas and buffers (Specific criterion c)	No existing unmet need established (Specific criterion a)
KEC position	Oppose proposed rezoning	Oppose proposed rezoning	Oppose proposed rezoning