Kitsap Environmental Coalition
People for a Safe and Healthy Environment

TO: Kitsap Board of County Commissioners

FROM: Kitsap Environmental Coalition Board

RE: NSTO Routing through/along PGFHP

DATE: September 29. 2026

The Kitsap Environmental Coalition has learned that **no analysis has ever been done of a North Sound to Olympics (NSTO) route alternative using a separated path in the right-of-way (ROW) along SR 104** between Port Gamble and the intersection of Bond Road and SR 104. This may be a much more beneficial and cost-conscious route than one through the middle of PGFHP.

In light of the **March 2025 BoCC Resolution** that states that the Sound to Olympics Trail (STO) will receive further review and analysis and **will not move forward until the Board provides direction and approval**, we request that analysis of this route be done before any further consideration of the route through the middle of PGFHP.

What we've learned about the SR 104 ROW alternative:

1. The SR 104 Alternative Has Not Been Adequately Evaluated

The 2011 *String of Pearls* identified SR 104 only as an **"on-road improvement"** adjacent to the highway. A modern, physically separated shared-use path—similar to the facility now being developed along SR 305 on Bainbridge Island—was not evaluated. Thus, the earlier conclusion that an SR 104 route was less desirable does not answer whether a **separated, shared-use path within the existing SR 104 ROW** could provide a more effective and desirable regional non-motorized trail.

2. The Existing Transportation ROW May Accommodate a Separated Trail

A preliminary review indicates that the **west side of SR 104 appears to have sufficient ROW for a 10-foot shared-use path with a 5-foot or greater separation from traffic** in substantial portions of the corridor. An additional 40' power-line ROW runs adjacent on westside. Much of both corridors is already cleared and generally

follows the relatively gentle grades of SR 104. These characteristics warrant engineering-level evaluation rather than dismissal based on the 2011 concept.

3. A Highway-Corridor Trail Could Better Fulfill the STO's Regional Transportation Purpose

An SR 104 route could connect **Kingston, Port Gamble, Gamblewood, George's Corner, Hansville and, through existing and planned connections, Indianola and Suquamish**. It would therefore function as a genuine **regional non-motorized transportation corridor**, connecting communities rather than primarily serving as an interior recreational trail.

Bainbridge Island's approach demonstrates that a separated shared-use path can be integrated into an existing state highway corridor. Such projects may also be competitive for federal active-transportation funding because of their regional connectivity and transportation function.

4. The SR 104 Route is Shorter and More Accessible

A preliminary comparison of the NSTO segment between the Kingston ferry and Hood Canal Bridge is significant:

	SR 104 ROW	**PGFHP Route**
Approx. distance	**9.8 miles**	**12.8 miles**
Elevation gain	**354 ft.**	**751 ft.**
Notable grade	Follows highway grades under 5%	**Carver Dr reaches ~12%**

The SR 104 alternative would be approximately **3 miles shorter** and have roughly **half the elevation gain**, potentially making it substantially more accessible to a broader range of users and more consistent with the function of a regional non-motorized transportation trail. (see attached map)

5. Construction Costs Deserve a Direct Comparison

WSDOT Active Transportation planning figures suggest a preliminary range of approximately **$600,000–$1.05 million per mile** for comparable facilities, with the Kingston ferry–West Kingston Road segment already constructed.

By contrast, completed STO segments through PGFHP have reportedly cost approximately **$1–3 million per mile**, substantially exceeding early estimates. The assumption that existing logging roads would necessarily make construction inexpensive has not been borne out by actual project costs.[1]

A side-by-side cost estimate using comparable design standards, contingencies, permitting, and construction conditions is therefore warranted.

6. Stream Crossings Should Be Evaluated, Not Presumed to Eliminate the Alternative

The SR 104 corridor would require several stream crossings. However, some locations are already being considered for **culvert improvements** as part of salmon restoration projects, including potential work involving the PG S'Klallam Tribe. Opportunities to coordinate trail construction with existing or planned fish-passage projects should be evaluated as part of the alternatives analysis. (see attached map diagram)

7. The SR 104 Alternative Could Reduce New Ecological Fragmentation

The County's **Rural Lands Analysis/Wildlife Corridor work** and Washington's **Habitat Connectivity Action Plan (WAHCAP)** emphasize maintaining connections between important habitat areas.

If PGFHP is determined to be an important component of the County's wildlife-connectivity network, a regional trail through its interior should demonstrate that it will not materially impair that function. An alternative that provides the same regional transportation function within an **existing transportation corridor** deserves serious consideration because it could avoid introducing a new, high-use human corridor through relatively intact habitat.

8. The PGFHP through-route using Carver Drive bypasses the Port Gamble business district and the Port Gamble S'Klallam Tribe's shoreline redevelopment.

This is a lost opportunity for both local residents and tourism. Moreover, it bypasses PGFHP's popular Bayview trailhead.

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[1] Kitsap County (Public Works) stated that **engineering and construction cost estimates for STO segments A and B had tripled since 2019**, because of labor and supply costs as well as the difficult topography. The County was also evaluating alternate routes to avoid wetlands, rivers, ravines and other natural features. Kitsap Daily News

9. The March 2025 Resolution Calls for This Analysis

The issue is not whether the SR 104 alternative has already been proven inferior. The issue is whether it has been adequately evaluated and compared to the route through the middle of the park. It has not.

Given its potential advantages in **accessibility, regional connectivity, construction cost, route length, elevation, funding eligibility, and avoidance of additional habitat fragmentation**, the SR 104 ROW warrants a professional comparative analysis before the County commits to a permanent route through PGFHP.

What We Are Asking the Board to Do

Direct that PGFHP framework update's scope of work be amended or supplemented to conduct a comparable feasibility analysis of an SR 104 ROW alternative.

The analysis should address ROW availability, engineering feasibility, safety, accessibility, environmental and wildlife impacts, stream crossings, construction and maintenance costs, permitting, and potential federal funding.

This is not a request for the Board to choose SR 104 today. It is a request that the Board make the route decision based on a fair comparison of viable alternatives—before committing the County to a permanent alignment through PGFHP.

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