



September 10, 2010

The Honorable Steve Bauer
The Honorable Josh Brown
The Honorable Charlotte Garrido
Board of Commissioners for Kitsap County
Commissioners' Office, MS-4
614 Division Street
Port Orchard, Washington 98366

Dear Commissioners Bauer, Brown, and Garrido:

Subject: Comments for the September 13, 2010 public meeting to receive comments on a Memorandum of Understanding with Pope Resources and OPG Properties, LLC (KC-260-10) regarding the North Kitsap Legacy Partnership

Send via e-mail

Thank you for the opportunity to comment on the proposed Memorandum of Understanding with Pope Resources and OPG Properties, LLC regarding the North Kitsap Legacy Partnership. While we understand the desire for certainty by the county and the other parties, we urge the county not to adopt a Memorandum of Understanding that may be perceived as committing the county to any particular set of comprehensive plan amendments until the planning process has reached a conclusion.

Futurewise is a statewide nonprofit organization. Our mission at Futurewise is to promote healthy communities and cities while protecting working farms, working forests, and shorelines for this and future generations. We have members in Kitsap County as we do through Washington State.

Futurewise recognizes that the Memorandum of Understanding specifically states on page 3 that the conceptual components of the North Kitsap Legacy Partnership may change for a variety of reasons. However, we are concerned that some of the provisions related to the North Kitsap Legacy Partnership may be perceived as prejudging the outcome of the planning process.

For example, the third bullet on page 3 of the agreement provides for the transfer of residential densities in or near Port Gamble. Further the fifth bullet on page 3 states that Port Gamble or nearby areas are to be an economic center. We understand that Pope Resources cannot subsidize Port Gamble forever and we also understand that LAMIRDS are often economic drains for both their owners and the county. But there

may be other development configurations that meet the needs of the county and the land owners. As an example for illustrative purposes only, perhaps one alternative might be to transfer the development capacity of the forest lands into one or more existing urban growth areas, with the county sharing some of the tax revenues. This potentially could be economically beneficial to the land owner, the county, and perhaps others. Futurewise recognizes that finding an urban growth area with the economic demand for greater development intensities in Kitsap County may be a challenge, but at this stage of the planning process it and other alternatives should not be perceived to be precluded.

After all, creating a center at Port Gamble is not without its economic challenges, especially given the uncertainties related to economic demand. The record of fully contained communities to date is poor, both for their land owners and the public. For some of the public costs, please see Sonia Krishnan, *Living near work? Great idea, in theory* The Seattle Times (August 14, 2007).¹

In addition, a center at Port Gamble contains significant legal and policy challenges. For example, the Regional Growth Strategy allocates 16 percent of Kitsap County's population growth between 2000 and 2040 to the rural area.² While this is the highest percentage rural allocation of any of the four central Puget Sound counties and in absolute terms is higher than the rural allocations of King County and Pierce County, it is much lower than the county's recent rural population growth. Between 2000 and 2005, 43 percent of the dwelling units built in Kitsap County were built in the unincorporated rural area.³ While we recognize that this is a significant improvement over the growth pattern between 1995 to 1999 when 57 percent of the county's housing growth was in the rural area, it will be a challenge to meet the rural population allocation under the county's existing comprehensive plan let alone a plan that allocates more growth to what is now a rural area. Indeed, the existing Kitsap County Countywide Planning Policies allocate 37 percent of the county's 2005 to 2025 population growth to the rural area.⁴ So there are significant policy and practical questions as to whether any addition population can be allocated to the rural area or an area that is currently rural.

¹ Accessed on September 10, 2010 at:

http://seattletimes.nwsourc.com/html/localnews/2003835247_urbanvillages14e.html

² Puget Sound Regional Council, *Vision 2040 Part II: Regional Growth Strategy* p. 19 (December 2009). Accessed on September 10, 2010 at: http://psrc.org/assets/1737/Part_II_Regional_Growth_Strategy.pdf

³ Kitsap County Department of Community Development, *Kitsap County Buildable Lands Report* p. 1 (August 2007). Accessed on September 10, 2010 at:

http://www.kitsapgov.com/dcd/community_plan/blp/final_blr_report/BLR%20Final%2009.12.07.pdf

⁴ *Adopted Kitsap Countywide Planning Policies* Appendix B: Population Distribution 2005 – 2025 p. b (November 19, 2007). Accessed on September 10, 2010 at:

http://www.kitsapregionalcouncil.org/countywide_planning.html

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But we are not asking you to make this decision at this time. Rather, we respectfully ask Kitsap County not to appear to commit to comprehensive plan changes until the planning process has been completed. This will require either postponing the decision on the Memorandum of Agreement until then or removing those portions of the Memorandum that may appear to commit to comprehensive plan amendments.

Thank you for considering our comments. Please call me at 206-343-0681 Ext 118 or e-mail me at tim@futurewise.org if you require additional information.

Sincerely

A handwritten signature in blue ink, consisting of two stylized, overlapping 'S' shapes. The top 'S' is larger and more prominent, with a small horizontal stroke at its top right. The bottom 'S' is smaller and positioned below the first, with a small horizontal stroke at its top right. The signature is fluid and cursive.

Tim Trohimovich, AICP
Co-Director of Planning & Law