

# SOUTH KITSAP INDUSTRIAL AREA

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Final Planned Action  
Environmental Impact Statement

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City of  
Bremerton

March 2012



# **SOUTH KITSAP INDUSTRIAL AREA**

## ***Final Planned Action***

### ***Environmental Impact Statement***

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Prepared for:

City of Bremerton

Prepared by:

EA|Blumen

AHBL

Landau

ERCI

Chris Webb & Associates

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Community Attributes

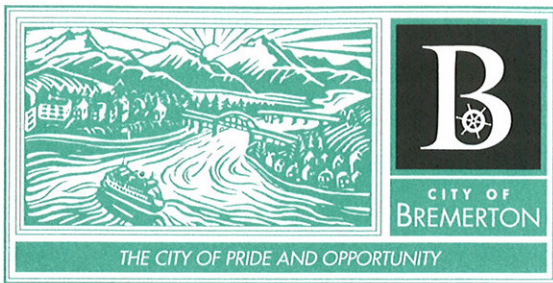
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March 2012





Department of Community Development

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345 6th Street, Suite 600  
Bremerton, WA 98337

March 29, 2012

### SKIA Subarea Plan Planned Action Final Environmental Impact Statement

Dear Interested Citizen:

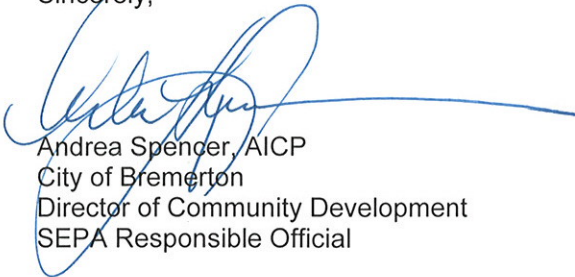
The City of Bremerton has completed the SKIA Subarea Plan Planned Action Final Environmental Impact Statement (EIS). The proposal considered in this Final EIS is adoption of a new Growth Management Act (GMA) compliant subarea plan and implementing regulations. Funded through a Climate Showcase Communities Grant from the US Environmental Protection Agency, key objectives of the proposal include economic development and job creation, protection of natural systems, reductions in greenhouse gas emissions and more sustainable development patterns and buildings, and development of innovative and sustainable infrastructure.

The Final EIS provides some additional information and clarification about the Proposal, identifies a Preferred Alternative, and responds to comments on the Draft EIS. Comments received did not result in modification of the Proposal. However, the Final EIS includes clarifications, makes factual corrections and provides supplemental information.

Electronic copies of the Final EIS on a compact disc can be obtained from the City of Bremerton, 345 6th Street, Suite 600, at a cost of \$22.00 (includes tax). You may also view the Final EIS and additional information about this project at the project website at [www.SustainableSKIA.com](http://www.SustainableSKIA.com).

Your interest in the City of Bremerton is greatly appreciated. If you would like more information about this proposal, please contact Doug McIntyre at 360-473-5845 or [doug.mcintyre@ci.bremerton.wa.us](mailto:doug.mcintyre@ci.bremerton.wa.us).

Sincerely,



Andrea Spencer, AICP  
City of Bremerton  
Director of Community Development  
SEPA Responsible Official

# FACT SHEET

## **Name of Proposal**

South Kitsap Industrial Area (SKIA) Subarea Plan

## **Proponent**

City of Bremerton

## **Location**

SKIA is an area of approximately 3,700 acres in south central Kitsap County, adjoining both the north and south sides of SR 3 and located just northeast of the boundary with Mason County. SKIA lies within the southernmost extent of the City of Bremerton UGA. It is surrounded by unincorporated Kitsap County to the northwest, east and south, and the unincorporated Belfair Subarea of Mason County to the west.

## **Proposal**

The action proposed by the City of Bremerton consists of the following related actions:

- 1 Adoption of an ordinance designating SKIA as a planned action for the purposes of the State Environmental Policy Act (SEPA) compliance, pursuant to RCW 43.21.031 and WAC 197-11-164. The planned action designation would apply to development of proposed commercial and industrial uses of the type and intensity established in the ordinance and considered in this EIS.
- 2 Adoption of a SKIA Subarea Plan, consistent with the City's Comprehensive Plan and the Washington Growth Management Act (GMA).
- 3 Updated development standards to implement the Subarea Plan, including new or revised zoning designations, low impact development standards and other measures that support sustainable economic development and greenhouse gas reduction.

## **Proposed Alternatives**

The Draft EIS evaluated three alternative scenarios for the SKIA subarea generally reflecting different levels of employment growth and emphases on different categories of jobs and development types. The Draft EIS alternatives included:

- **Alternative 1** (No Action) – Assumes continuation of existing development trends, with no new measures to promote sustainable development, economic development or adoption of a

planned action ordinance. Provides the least amount of new development and employment capacity among the alternatives.

- **Alternative 2** (Reduced MIC/Mixed Use Center) – Reduces the size of the MIC slightly to allow for a new mixed use center in the southwest corner of the subarea. Provides for an intermediate level of development and employment capacity.
- **Alternative 3** (Intensive MIC) – Provides for the greatest amount of new development and employment capacity among the three alternatives.

### **Preferred Alternative**

As described in this Final EIS, the preferred alternative is the same as Alternative 2, analyzed in the Draft EIS (see brief description below), with one exception. The geographic area of the Manufacturing-Industrial Center (MIC) is reduced, while retaining the same level of employment capacity as Alternative 2.

### **Lead Agency**

City of Bremerton

Community Development Department

### **SEPA Responsible Official**

Andrea Spencer, Director

City of Bremerton Community Development Department

### **EIS Contact Person**

Doug McIntyre, Long-Range Planner

City of Bremerton Community Development

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### **Final Action**

Adoption of SKIA Subarea Plan and Planned Action Ordinance

### **Required Approvals and/or Permits**

Approval of SKIA Subarea Plan and Planned Action Ordinance by the Bremerton City Council.

### **Authors and Principal Contributors to this EIS**

The **SKIA Subarea Planned Action EIS** has been prepared under the direction of the City of Bremerton Community Development Department. Research and analysis associated with this EIS were provided by the following consulting firms:

- **EA|Blumen** – lead EIS consultant; document preparation; public services
- **AHBL** – land use

- **Landau** – natural environment
- **ERCI** – cultural resources
- **Chris Webb & Associates** – utilities
- **Fehr & Peers.** – transportation, greenhouse gas analysis
- **Community Attributes** – alternatives development
- **Mithun** – aesthetics
- **Weinman Consulting** – SEPA strategy, alternatives development
- **Henderson Young & Company** – public services

### **Location of Background Data**

#### City of Bremerton Community Development

Attn: Doug McIntyre Telephone: (360) 473-5845  
 345 6th Street, Suite 600  
 Bremerton, WA 98337

### **Date of Issuance of this Final EIS**

March 29, 2012

### **Availability of this Final EIS**

Copies of this Final EIS have been distributed to agencies, organizations and individuals noted on the Distribution List (Chapter 4).

The Final EIS can be reviewed at the Bremerton City Hall, 345 6<sup>th</sup> St, Suite 600, Bremerton.

This Final EIS is also available online at: [www.SustainableSKIA.com](http://www.SustainableSKIA.com)

Additional copies may be purchased at the City of Bremerton at a cost of \$22 (includes tax).

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## Section 1 - Description of the Proposal and Alternatives

# 1. DESCRIPTION OF THE PROPOSAL AND ALTERNATIVES

## 1.1 Introduction

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### Overview of the Proposed Action

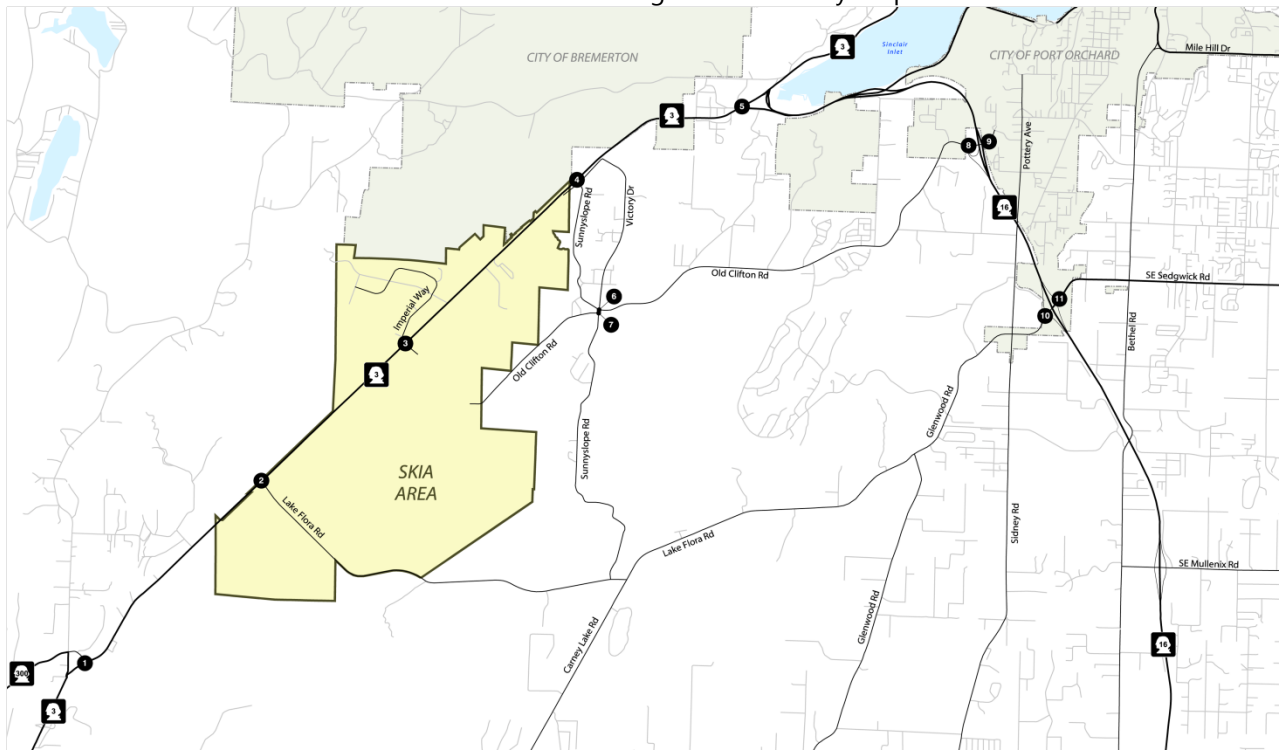
The action proposed by the City of Bremerton consists of the following related actions:

- 1 Adoption of an ordinance designating the South Kitsap Industrial Area (SKIA), shown in Figure 1-1, as a planned action for the purposes of the State Environmental Policy Act (SEPA) compliance, pursuant to RCE 43.21.031 and WAC 197-11-164. The planned action designation would apply to development of proposed commercial and industrial uses of the type and intensity established in the ordinance and considered in this EIS.
- 2 Adoption of a SKIA Subarea Plan, consistent with the City's Comprehensive Plan and the Washington Growth Management Act (GMA).
- 3 Updated development standards to implement the Subarea Plan, including new or revised zoning designations, low impact development standards and other measures that support sustainable economic development and greenhouse gas reduction.

### Study Area

The SKIA subarea consists of approximately 3,700 acres located in south central Kitsap County, adjoining both the north and south sides of SR 3 and located just northeast of the boundary with Mason County. It is surrounded by unincorporated Kitsap County to the northwest, east and south, and the unincorporated Belfair Subarea of Mason County to the west. Please see Figure 1-1.

Figure 1-1: Vicinity Map



Source: Fehr & Peers, 2010.

SKIA lies within the southernmost extent of the City of Bremerton UGA. The majority of the subarea is part of the incorporated City of Bremerton, although small areas along the northern and southern boundaries is in unincorporated Kitsap County (See Figure 1-2). Of the approximately 3,700 acres in the subarea, approximately 236 are in the unincorporated area.

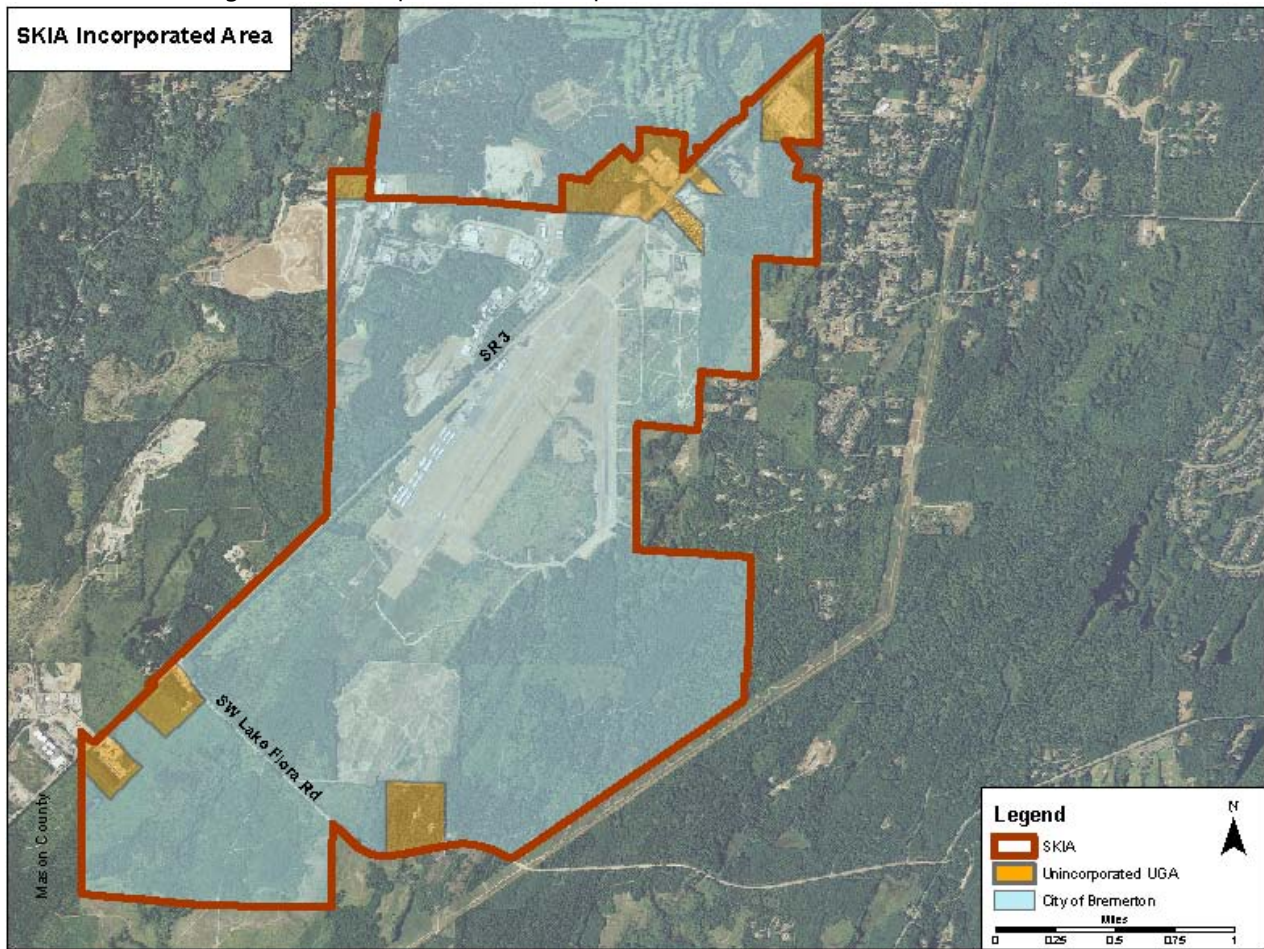
### Background

In 2008, the City of Bremerton amended the Comprehensive Plan to add a designation for the SKIA Manufacturing/Industrial Center. The Plan describes the SKIA subarea as follows:

*The South Kitsap Industrial Area (SKIA) has been long established by Kitsap County as an Urban Growth Area (UGA), and is identified in the Vision 2040 Regional Plan by Puget Sound Regional Council as one of eight formally designated "Manufacturing /Industrial Centers."*

*The Port of Bremerton owns a significant portion of the property within SKIA, with their holdings being the Bremerton National Airport and the Olympic View Business and Industrial Parks, each accessed from State Highway 3.*

Figure 1-2: Incorporated/Unincorporated Areas



Source: AHBL, 2011

*The SKIA Manufacturing/Industrial Center (SKIA MIC) will retain a different form of urban development than Bremerton's current regional or district centers. The physical size and location of this center allows strategic focused economic growth and it is expected to receive a significant proportion of Kitsap's employment growth in the manufacturing and industrial sectors.*

*It is expected that following substantial annexation of SKIA that the City will prepare a detailed sub area plan that addresses such items as development standards and permitted uses, provision of urban services and infrastructure, and the protection of essential public facilities such as the Bremerton National Airport (as required by RCW 36.70.547)*

Source: City of Bremerton, 2008

In 2009 the City was awarded a Climate Showcase Communities grant from the US Environmental Protection Agency to prepare a Subarea Plan and Planned Action EIS for SKIA. As described in the grant application, key objectives are to:

- Develop policies and programs to support sustainability and reduce GHG emissions via the State Environmental Policy Act (SEPA) environmental review process;
- Integrate green/low-impact development techniques, storm-/wastewater recycling, and greenhouse gas (GHG) emissions reduction strategies into the City's Comprehensive and Subarea planning processes; and
- Support green economic development and job creation in SKIA for years to come.
- Allow the City to proactively address development and implement carbon emissions reductions techniques while achieving economic development goals.

### **Objectives of the Proposal**

As described above, the Proposed Action is intended to achieve the following objectives:

- Enhance sustainability and reduce greenhouse gas emissions
- Incorporate low impact development techniques
- Promote job creation for the region
- Explore options for clean technology economic development
- Provide environmental stewardship
- Incorporate green and sustainable infrastructure
- Provide regional leadership in sustainable economic development

## **1.2 Planning Context**

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### **Growth Management Act**

The Growth Management Act (GMA) sets a framework for the planned and efficient growth of communities and protection of environmental and natural resources, and provides direction for developing comprehensive plans and subarea plans. Cities and counties planning under GMA must prepare and update Comprehensive Plans consistent with the requirements of GMA, and implement them through their capital improvement plans, programs and development regulations. Kitsap County and the City of Bremerton are required to plan under the GMA. Policy direction for SKIA is currently provided by the Bremerton GMA Comprehensive Plan.

## **Vision 2040**

*Vision 2040* is a regional plan prepared by the Puget Sound Regional Council (PSRC) that establishes the land use and transportation framework for the four county region encompassing Snohomish, King, Pierce and Kitsap counties. Vision 2040 designates SKIA as one of eight Manufacturing/Industrial Centers (MIC) within the four-county region. The Plan recognizes MICs as important employment locations that serve both current and long-term regional economic objectives.

*Vision 2040* calls for the provision of infrastructure and services in MICs necessary to serve intensive manufacturing and industrial activity. MICs are given funding priority both for transportation infrastructure and for economic development.

## **City of Bremerton Comprehensive Plan**

The City of Bremerton's GMA-compliant Comprehensive Plan provides general policy direction for promoting economic growth and attracting new employment opportunities Citywide. While these policies do not address SKIA specifically, they do support the City's efforts to plan for development within SKIA.

In 2008, the City amended the Comprehensive Plan to add the "SKIA Manufacturing/Industrial Center (SKIA MIC)" as a new center type. As stated in the 2008 amendment, the SKIA MIC is "expected to retain a different form of urban development than Bremerton's current regional or district centers. The physical size and location of this center allows strategic focused economic growth and it is expected to receive a significant proportion of Kitsap County's employment growth in the manufacturing and industrial sectors." This policy direction is consistent with direction for Regional Manufacturing/ Industrial Centers provided in *Vision 2040*.

A "MIC (Manufacturing/Industrial Center)" land use designation was also adopted as part of the City's 2008 Comprehensive Plan amendment and applied to SKIA. The MIC designation accommodates large scale and heavy industrial and manufacturing uses that cannot be easily mixed with other activities. Its focus is on providing regional growth opportunities for industrial development.

## **Development Regulations**

The entire SKIA subarea is zoned as Industrial by the City of Bremerton. The intent of the Industrial (I) zone is to accommodate large-scale and/or heavy industries in a manner that reduces impact to the community while

meeting industry's needs for easy access, large sites, and locations that do not cause conflicts with residential and other less intense use areas.

Areas within the City that are adjacent to SKIA to the north are zoned Industrial Park (IP) and City Utility Lands (CUL). The intent of the Industrial Park (IP) zone is to provide an environment for and conducive to a broad range of existing and future light industrial, office and large retail uses. The intent of the City Utility Lands (CUL) zone is to preserve resource-related functions of land, and to protect watersheds and timberlands.

### **1.3 Planned Action Process**

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#### **Planned Action Overview**

According to WAC 197-11-164, a Planned Action is defined as a project that has the following characteristics:

- is designated a Planned Action by ordinance;
- has had the significant environmental impacts addressed in an EIS;
- has been prepared in conjunction with a comprehensive plan, subarea plan, master planned development, a phased project, or with subsequent or implementing projects of any of these categories;
- is located within an urban growth area;
- is not an essential public facility; and
- is consistent with an adopted comprehensive plan.

The City will follow applicable procedures, described generally below, to review proposed projects within the study area through the land use review process associated with each project to determine their impacts and impose any appropriate development conditions.

#### **Planned Action EIS**

The significant environmental impacts of projects designated as Planned Actions must be identified and adequately analyzed in an EIS (WAC 197-11-164). Planned Action projects should only be designated when a city can reasonably analyze the area-specific impacts that would occur as a result of the types of projects designated.

#### **Planned Action Ordinance**

WAC 197-11-168 requires the ordinance designating the Planned Action to include the following:

- a description of the type of project action being designated as a Planned Action;

- a finding that the probable significant environmental impacts of the Planned Action have been identified and adequately addressed in an EIS; and
- the identification of mitigation measures that must be applied to a project for it to qualify as a Planned Action.

Following the completion of the EIS process, the City will designate the Planned Action by ordinance. The ordinance will identify mitigation, as described in this EIS, which would be applicable to future site-specific development actions. Mitigation could include requirements that would apply to all development in the study area as well as measures that may apply on a case-by-case basis.

## 1.4 Environmental Review

### Scope of Review

Pursuant to SEPA Rules (WAC 197-11-408 through 410), a Determination of Significance was issued by the City on September 30, 2010 for the Subarea Plan, proposed zoning regulations and the associated Planned Action level of review. Interested citizens, agencies, organizations, and affected tribes were invited to submit comments on the scope of the Draft EIS during the scoping period, which closed on October 20, 2010. No comments on the EIS scope were received. The Determination of Significance and Scoping notice are included in Appendix B of the Draft EIS.

This EIS addresses the following topics

- **Natural Environment**
  - o Earth – hydric soils, critical areas, geologically hazardous areas
  - o Water – wetlands, water supply and recharge, waterways
  - o Plants and Animals – wildlife, fisheries (anadromous fish passage, rearing habitat in Sinclair Inlet)
- **Air Quality** – Greenhouse gas emissions
- **Land Use/Plans and Policies** – Compatibility with existing and planned development in surrounding area; consistency with Bremerton National Airport operations; relationship to relevant plans, policies and regulations; employment analysis
- **Cultural Resources**
- **Aesthetics** – Quality of urban environment, design and character of existing buildings, building height, bulk and scale, internal and external compatibility
- **Transportation** – Level of service, level of auto/truck traffic generation, rail connections, future traffic flows

- **Public Services** – Police, fire
- **Utilities** – Sanitary sewer, domestic water, stormwater

### Other Environmental Review

A portion of the SKIA study area, located along South Lake Flora Road, has been identified as a possible site for a future Washington Department of Corrections Reception Center. This site, together with other sites identified by the Department of Corrections, is being considered in a separate SEPA process lead by the Department of Corrections. Should property within SKIA be selected for the future Department of Corrections facility, Subarea Plan goals and land use designations will be modified as needed to recognize this use.

While recognizing this ongoing process, until a decision is made, the site is assumed to be incorporated in the SKIA Subarea Plan alternatives as described later in this Chapter and analyzed in this EIS.

### SEPA/GMA Integration

WAC 197-11-210 authorizes GMA jurisdictions to integrate the requirements of the SEPA and GMA. The goal is to ensure that environmental analysis under SEPA occurs concurrently with, and as an integral part of, the planning and decision-making process under GMA. At a minimum, environmental analysis at each stage of the GMA planning process should address impacts associated with planning decisions. Analysis of environmental impacts in the GMA planning process can result in better-informed GMA planning decision as well as avoid delays and duplication.

WAC 197-11-228 states that the appropriate scope and level of detail of environmental review should be tailored to the GMA action under consideration; jurisdictions may modify SEPA phased review as necessary to track the phasing of GMA actions; and the process of integrating SEPA and GMA should begin at the early stages of plan development.

The City of Bremerton has elected to follow the principles of integration for the SKIA Subarea Plan and Planned Action EIS. Integration of the environmental analysis with the planning process informs the preparation of a GMA compliant subarea plan and facilitates coordination of public involvement activities. However, for the purpose of formal agency review and comment on the SKIA Subarea Plan, the City is providing multiple opportunities for comment. A 40-day comment period was provided during the Draft EIS comment period and a 60-day comment period is being provided for review of the revised Draft Subarea Plan.

## Public Involvement

Public involvement, review, and comment are an important element of the City's SKIA planning and EIS process. The public involvement program is designed to meet the following objectives.

- To obtain input from all interested members of the community through all aspects of plan development.
- To encourage two-way communication between the City, its partner agencies, and community stakeholders.
- To develop a Subarea Plan that will have the support of the community and guide development in SKIA over the next 20 years.
- To provide early opportunities for interested members of the public, agencies and other stakeholders to comment on the Planned Action EIS and ordinance

The following discussion summarizes public involvement activities that have already occurred and those that are planned for the future.

### Sustainable SKIA Webpage

The Sustainable SKIA website, located at <http://www.SustainableSKIA.com> on the City's website, provides information on project status, future meeting dates, published documents and analysis, contact people and other key information.

### Stakeholder Meetings

In September 2010, the project team conducted interviews with individual stakeholders, property owners, businesses and special interest group representatives. The interviews provided the project team with an expanded understanding of priorities and concerns in the area as well as an opportunity to provide updated project information to those who were interviewed about the planning process.

### Scoping and Vision Public Meeting

A workshop was held on October 13, 2010 to invite comments on the scope of the DEIS and the Comprehensive Plan vision statement. This meeting included an informal open house, with informational displays and staff available to meet one-on-one with participants, as well as a short presentation and question/answer session. Comments on the EIS scope were invited, although no specific comments on the EIS were received.

### Advisory Group Meetings

In order to provide input on the planning process, the City created two advisory groups, the Technical Working Group and the Executive Committee. Each is described below:

- Technical Working Group (TWG). The purpose of the TWG is to review technical information, provide input and recommendations, and work collectively to refine components of the Subarea Plan. This group is comprised of senior technical staff from each of the regional jurisdictions, Port of Bremerton, SKIA property owners, Suquamish Tribe, Port Gamble/S'Klallam Tribe, South Kitsap Economic Development Alliance, Sustainable Bremerton, Kitsap Regional Coordinating Council, Hood Canal Coordinating Council, and the Puget Sound Naval Shipyard/Naval Base Kitsap.

The TWG met three times over the course of preparation of the Subarea Plan and EIS to review alternatives and provide technical input on aspects of plan development.

- Executive Committee (EC). The purpose of the EC is to provide policy-level input to the SKIA Subarea Plan project team and City of Bremerton. Relying on the TWG's technical expertise and review of work products before each EC meeting, the EC's focus is to provide input about key decision points, address different views shared by TWG members, and bring EC organizations' interests and concerns to the table. The EC includes elected and appointed officials from the following organizations: Kitsap County Commission, Pt. Orchard City Council, Bremerton City Council, Bremerton Planning Commission, Port of Bremerton Port Commission, Suquamish Tribal Council, Puget Sound Naval Shipyard, and Naval Base Kitsap.

The EC met four times over the course of preparation of the Subarea Plan and EIS to review alternatives and overall plan direction.

The last two meetings of the TWG and EC were conducted as joint meetings. This had the benefits of an expanded discussion of key issues and sharing of different perspectives. Future meetings of the TWG and EC to consider key policies issues and implementation priorities are planned.

#### Draft EIS and Subarea Plan Public Meeting

On June 16, 2011, the City of Bremerton hosted a public meeting on the Draft EIS and Subarea Plan. The meeting included an open house, presentation, question and answer session and additional time for one-on-one discussion with City of Bremerton staff and consultants. Twenty-three individuals completed the meeting sign-in sheet.

The open house included the following information stations: Project Overview, Subarea Plan, EIS, Land Use, Infrastructure, Sustainability, Natural Environment, and Economic Development.

Following the open house portion of the meeting, the project team presented a slide show overview of key Subarea Plan and EIS elements and noted that the public comment period would be open until July 21, 2011. The presentation can be viewed at [www.sustainableskia.com](http://www.sustainableskia.com).

Hearing no questions or comments from the group, a second open house period was provided to allow participants an opportunity to talk with project team members at the information stations.

### Draft Subarea Plan

Prior to City decisions on the Draft Subarea Plan and implementing regulations, including the planned action ordinance, the Bremerton Planning Commission will review the documents and prepare a recommendation to the City Council. Public comment will be invited as part of this review. Please see the project website at [www.sustainableskia.com](http://www.sustainableskia.com) for updated public meeting information.

## **1.5 Proposed Action and Alternatives**

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### **Subarea Plan**

As described above, the proposed action includes adoption of a SKIA Subarea Plan. Elements of the Subarea Plan include the following topics:

- Vision
- Natural Environment
- Economic Development
- Land Use
- Transportation
- Greenhouse Gases
- Infrastructure
- Implementation

The draft Plan identifies goals and strategies for each topic listed above and, in some cases, proposed strategies serve to mitigate impacts identified in this EIS. The draft Plan also included a preliminary regulatory framework for consideration.

Following review of the draft Subarea Plan and EIS, the Subarea Plan has been revised, including revisions to draft goals and strategies, development of a capital facilities plan, and development of implementing regulations. The revised Draft Subarea Plan is being issued

concurrent with the Final EIS and will include additional review by the Bremerton Planning Commission and City Council during spring 2012.

### Sustainability Measures

Sustainable low-impact development is a fundamental goal that underlies the Subarea Plan. Example actions to support sustainable development measures are listed below. These measures and other specific actions have been considered in the Subarea Plan and this EIS.

- Green building standards for public and private development
- Low impact development standards, such as clearing limits, protection of native soils, tree canopy coverage, native landscaping and limits on effective impervious surfaces
- Incentives and standards to promote compact clustered development
- Standards for energy efficient outdoor lighting to reduce light pollution and reduce energy consumption
- Green streets with integrated stormwater management via landscape elements
- An off-street trail network that minimizes walking distances within development clusters
- Ambitious mode split goals
- Low maintenance transportation infrastructure, such as roundabouts and LED lighting
- Low impact development for stormwater treatment
- Innovative and ultra-high performance water conservation
- Reclaimed water and rainwater re-use where reclaimed water is not available

### **Draft EIS Alternatives Overview**

The Draft EIS evaluated three alternative scenarios for the SKIA subarea, but did not identify a preferred alternative. The alternatives generally reflect different levels of employment growth and emphases on different categories of jobs and development types. The Draft EIS alternatives included:

- **Alternative 1** (No Action) – Assumes continuation of existing development trends, with no new measures to promote sustainable development, economic development or adoption of a planned action ordinance. Provides the least amount of new development and employment capacity among the alternatives.
- **Alternative 2** (Reduced MIC/Mixed Use Center) – Reduces the size of the MIC slightly to allow for a new mixed use center in the

southwest corner of the subarea. Provides for an intermediate level of development and employment capacity.

- **Alternative 3** (Intensive MIC) – Provides for the greatest amount of new development and employment capacity among the three alternatives.

Key features associated with each Draft EIS alternative are summarized in Table 1-1 below.

Table 1-1: Alternatives Overview

| Features                                         | Alternatives   |                                        |                    |
|--------------------------------------------------|----------------|----------------------------------------|--------------------|
|                                                  | 1<br>No Action | 2<br>Reduced MIC /<br>Mixed Use Center | 3<br>Intensive MIC |
| Total new development (square feet) <sup>1</sup> | 800,000        | 3,850,000                              | 5,600,000          |
| Total new employment (jobs) <sup>2</sup>         | 1,400          | 6,500                                  | 10,000             |
| MIC Boundaries                                   | No change      | 268 acre reduction                     | No change          |
| Sustainability Measures                          | No             | Yes                                    | Yes                |
| Planned Action Ordinance                         | No             | Yes                                    | Yes                |

**Source: EA|Blumen, 2011**

<sup>1</sup> See Draft EIS Appendix C for methodology.

<sup>2</sup> Assumes 20-year planning horizon. Assumes 1 employee/500 sf of building area. See Draft EIS Appendix C for methodology.

### Analysis Areas

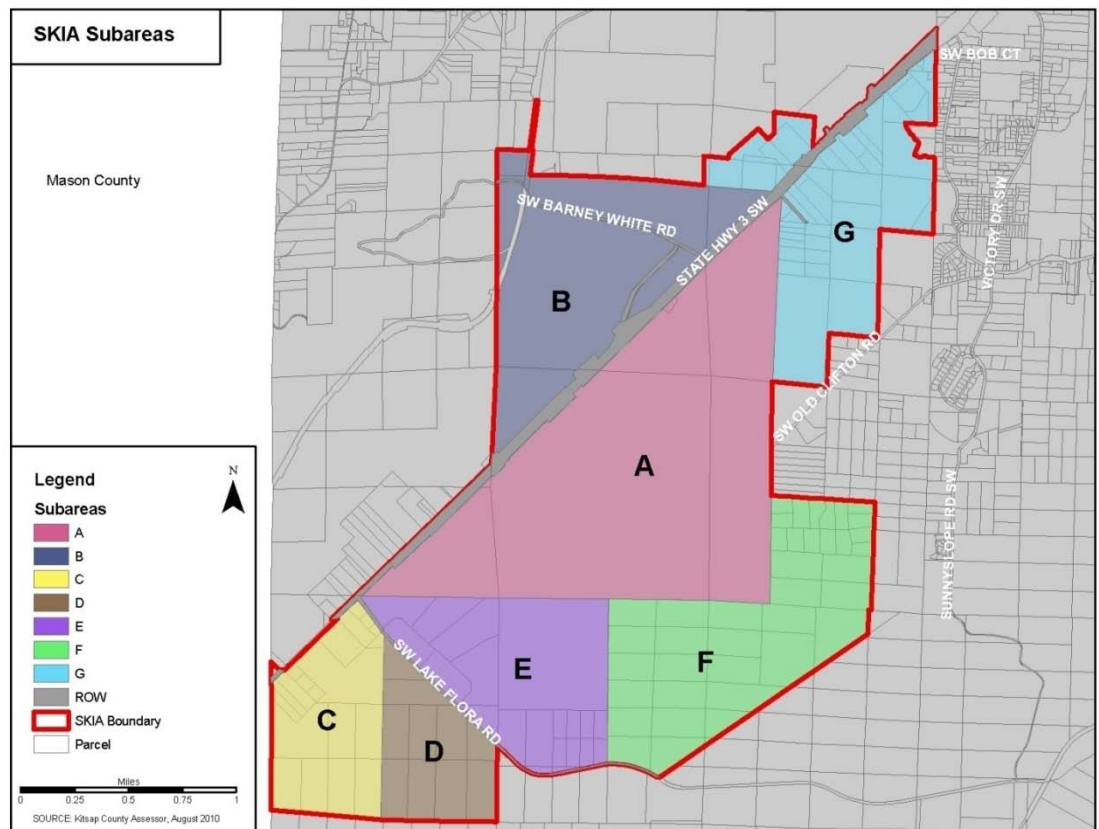
For the purpose of analysis and discussion in this EIS, SKIA has been divided into seven smaller analysis areas, referred to in this EIS as Areas A through G and shown in Figure 1-3. Each analysis area is briefly described in Table 1-2 below.

Table 1-2: SKIA Analysis Areas

| Analysis Area | Acres | Existing Development Characteristics                                                                               |
|---------------|-------|--------------------------------------------------------------------------------------------------------------------|
| A             | 1,090 | Bremerton National Airport and surrounding property                                                                |
| B             | 596   | Olympic View Business Park                                                                                         |
| C             | 280   | Primarily undeveloped; scattered development includes warehouse, residences                                        |
| D             | 181   | Vacant, forest land                                                                                                |
| E             | 388   | Primarily undeveloped forest land, scattered residences                                                            |
| F             | 592   | Forest and undeveloped                                                                                             |
| G             | 464   | Primarily undeveloped; scattered development includes warehouse, auto wrecking, residences, and recreational uses. |

**Source: Kitsap County Assessor's Office, EA|Blumen, 2011**

Figure 1-3: Analysis Areas



**Source: AHBL, 2011**

### Preferred Alternative

The City has identified Alternative 2 as the Preferred Alternative, with one exception: a reduced geographic area of the MIC. It assumes an intermediate level of growth the same as Alternative 2, providing capacity for an additional 5,000 employees in the MIC and an additional 1,500 new employees in a new mixed use center. The size of the MIC would be reduced by approximately 460 acres to allow for destination/ mixed use development in the southwest corner of the subarea (Analysis Areas C and D). With this reduction, the southern boundary of the MIC would follow SW Lake Flore Road. All other MIC boundaries would remain as shown in Figure 1-3, above.

A total of 3,075,000 square feet of new development is assumed in the MIC, supported by an additional 775,000 square feet of new development in the mixed use center (Analysis Areas C and D).

In the MIC, new development would be concentrated in the Olympic View Business Park, but would also occur throughout the subarea, see Table 1-3. Within the MIC, retail and commercial services to serve new industrial development is assumed. Development in the mixed use center could include retail, office and entertainment/recreational uses.

Table 1-3: Development and Employment Capacity by Analysis Area<sup>1</sup>

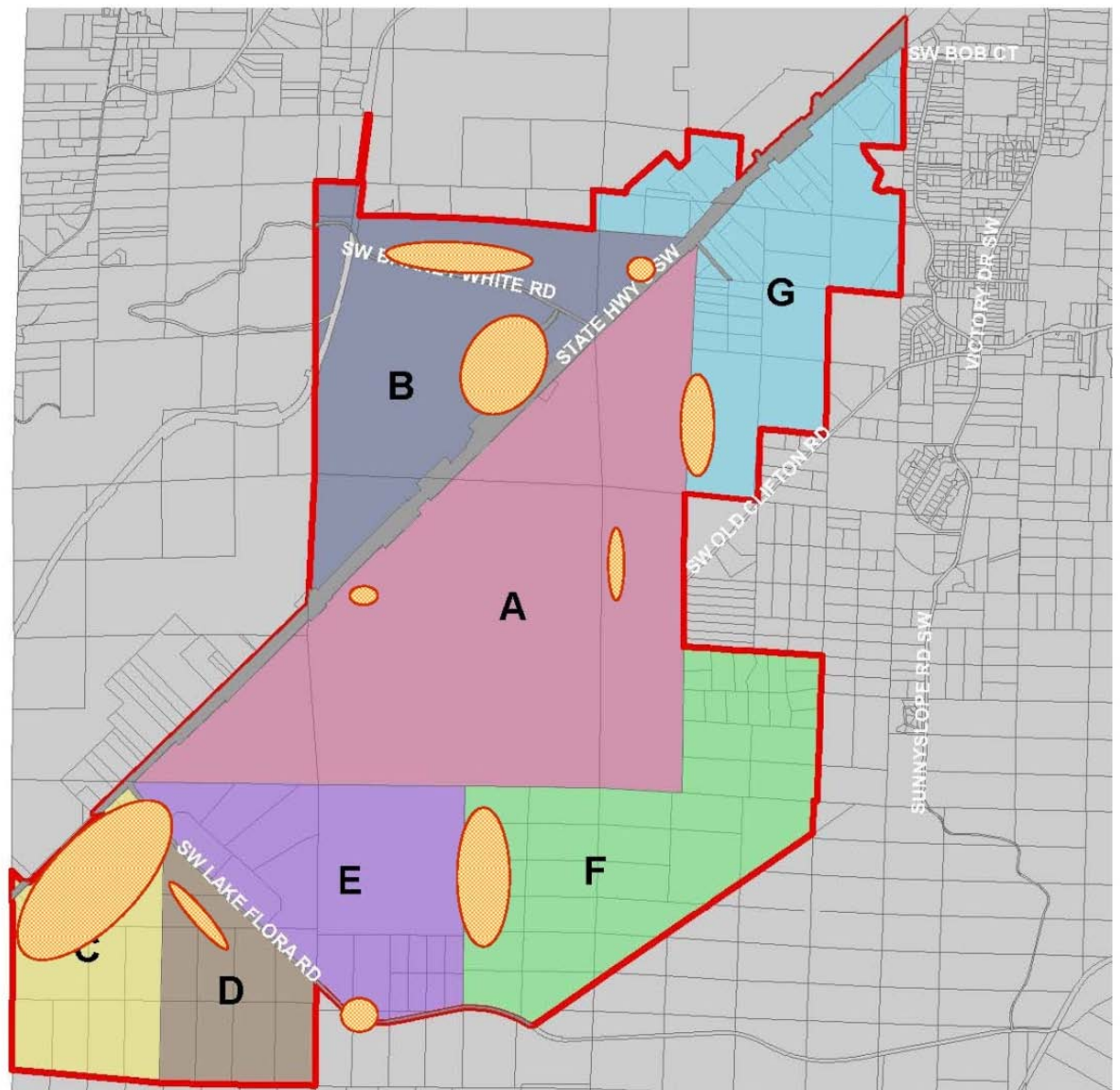
| Analysis Areas | Preferred Alternative |              |
|----------------|-----------------------|--------------|
|                | Development Area      | Jobs         |
| A              | 350,000               | 500          |
| B              | 1,175,000             | 1,500        |
| C              | 775,000               | 1,500        |
| D              | 225,000               | 400          |
| E              | 425,000               | 850          |
| F              | 575,000               | 1,150        |
| G              | 325,000               | 600          |
| <b>TOTAL</b>   | <b>3,850,000</b>      | <b>6,500</b> |

**Source: EA|Blumen, 2011**

<sup>1</sup> See Draft EIS Appendix C for methodology.

Figure 1-4 illustrates an estimate of the location and size of potential development area under the Preferred Alternative. In this figure, the potential location of future development is estimated based on past development trends and availability of infrastructure and does not represent policy or regulatory intent by the City of Bremerton.

Figure 1-4: Preferred Alternative



**Disclaimer:** These are for information and analysis only and do not represent policy or regulatory intent by the City of Bremerton

**Source:** EA|Blumen, 2011

### Utilities

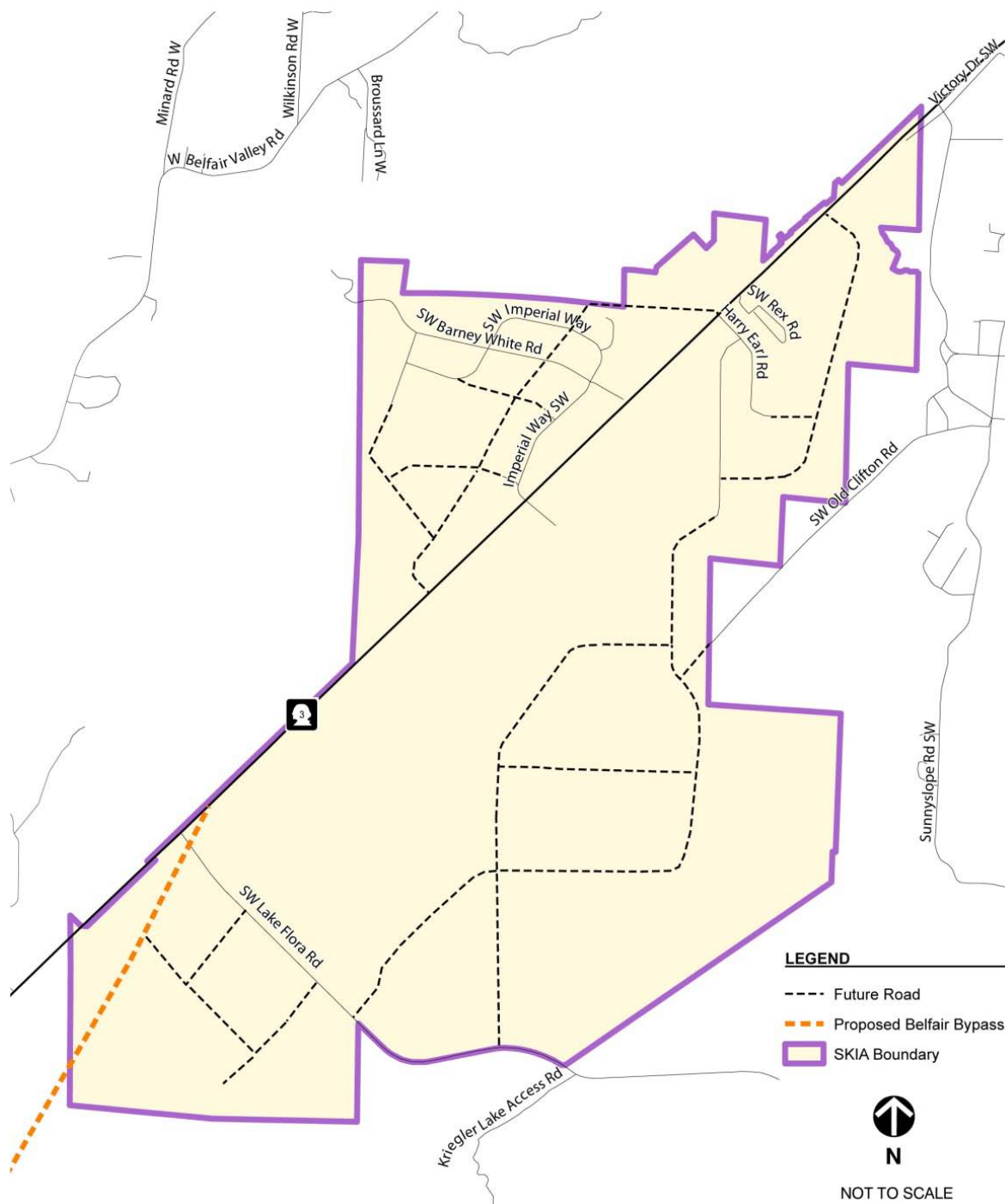
Infrastructure would be extended to serve the entire subarea, including water, sewer, stormwater facilities and the roadway network.

Following the identification of the preferred alternative for SKIA, a more specific set of utility flow calculations and improvements for water and sewer were developed. This more specific information is described in Appendix 1 and is consistent with the capital facilities plan for SKIA.

### Transportation

A conceptual roadway circulation plan is presented in Figure 1-5 below, and is also shown as Figure A-3 of the Subarea Plan. Precise roadway alignments and specific site access details will be provided as development occurs. Roadway design details (e.g., number of lanes required to serve traffic flows) will also be determined as the site develops.

Figure 1-5: Conceptual Roadway Network



## Section 2 - Comment Letters and Responses

## 2. COMMENT LETTERS AND RESPONSES

The Draft EIS (DEIS) was issued on June 9, 2011, with public comments due July 11, 2011. On June 16th, 2011, a public meeting was held to give the public an opportunity to informally meet with the project team, hear about the proposal and key environmental issues and provide written comments on the DEIS.

During the DEIS public comment period, 11 written comment letters and e-mail correspondence were received from 4 public agencies, one organization, one tribe, and 5 individuals.

This chapter of the Final EIS (FEIS) contains comments received on the June 2011 Draft EIS (DEIS) and responses to the comments. Each comment letter is included in this section of the FEIS. Comment letters/numbers are noted in the margins of the letters.

| Letter Number | Commenter Name                                                             |
|---------------|----------------------------------------------------------------------------|
| 1             | Port of Bremerton                                                          |
| 2             | Kitsap County Board of County Commissioners                                |
| 3             | Kitsap County Department of Public Works, Transportation Planning Division |
| 4             | Bremerton Motorsports Park                                                 |
| 5             | McCollough Hill Leary, PS                                                  |
| 6             | Washington State Department of Transportation                              |
| 7             | Suquamish Tribe                                                            |
| 8             | Doug Skrobut                                                               |
| 9             | Adam Victor                                                                |
| 10            | Roger Zabinski                                                             |
| 11            | Tim Thomson                                                                |
| 12            | Anonymous                                                                  |

## Port of Bremerton – comments submitted 7-11-11

### South Kitsap Industrial Area Subarea Plan

#### Natural Environment – Goal NE 1

- The FAA discourages open bodies of water in, around, or near runways serving jet aircraft. The Port encourages the use, where practical, for LID stormwater features to minimize the need for large regional stormwater detention ponds. However, should soils be non-conductive for infiltration and detention is required, facilities must be reviewed by FAA and USDA to ensure attractant to wildlife is minimized.

1

#### Economic Development – Goal ED 2

- ED2.1, ED 2.4 concur- the economic strategy for SKIA must be balanced to attract traditional and expanding green sector jobs.
- Greater emphasis and recognition needs to be placed on the importance of Bremerton National Airport as an economic driver within SKIA and the Kitsap/North Mason region. It appears the plan downplays the regional significance of this asset within SKIA.
- ED2.5 This strategy is perhaps one of the most important and yet received the least attention. The Navy plays a significant role in this community and within SKIA. Partnering with the PSNS to attract and retain naval subcontractors to SKIA should not be underestimated.
- Sustainable SKIA – Sustainable is a popular buzz word now, but linking the two words right from the beginning limits our prospects right out of the gate.
- Like many buzz words, “Sustainable” will become over-used and meaningless (if it isn’t already.).
- The plan refers to marketing this property, but does not address where the funding for the marketing is coming from, who will oversee the message and materials and who will have input to the plan. Funding is a serious concern as this plan (as outlined to date) is already very expensive in terms of infrastructure, amenities, etc. It will be equally expensive to do the marketing and PR for this effort- funding source not identified. Would all of the property owners be involved in the marketing or funding of the marketing?
- Recall the lessons the Port learned from SEED. This green market is a limited market currently, without a good sense of when it will experience growth. The inevitable cost increases of this “green” approach will make this property more expensive than other competitive properties in an era when the bottom line is everything.
- ED 4 – encourage environmental performance. Discourage gimmicks that may frighten a potential business from relocating within SKIA.
- “Sustainable” and “Green” are fine but we must be careful with onerous land development and building construction “requirements” that will hinder interest in SKIA development. The Port supports LEED Silver for public buildings. The

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| State requires it if state funding is used. However, the Port’s experience with SEED did not produce definitive interest in Port property or building lease although it might have later on.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 10 cont. |
| <ul style="list-style-type: none"> <li>Need to promote existing Foreign Trade Zone (FTZ) for Zone A, B. FTZ site activation is now available beyond OVIP and BNA.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 11       |
| Land Use LU 1 & 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |          |
| <ul style="list-style-type: none"> <li>There is no mention in the plan regarding the current or future status of the Bremerton Motorsports Park (BMP), a designated 4(f) activity. This activity has been a permitted use on the airport for over 50 years and provides recreational and economic impacts to the local community. The Port is working to remove the 147 acre activity from its current location (Zone A) and has signed a lease with BMP to use 247 acres of OVIP industrial land (Zone B) for racing activities. This activity needs to be addressed as it impacts not only the goals and strategies for SKIA but will also impact available land use within the MIC.</li> </ul> | 12       |
| <ul style="list-style-type: none"> <li>The Port is interested in pursuing Boeing as a potential tenant for the 737 replacement project. This is envisioned as a large industrial complex similar to what Boeing has built on Paine Field and recently in South Carolina. Will this pursuit require a designation of “Heavy Industrial” verses “Industrial” within SKIA?</li> </ul>                                                                                                                                                                                                                                                                                                                | 13       |
| Transportation Goal T 1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |          |
| <ul style="list-style-type: none"> <li>Rail access to Zone B is very limited and requires USN cooperation.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 14       |
| <ul style="list-style-type: none"> <li>Gorst bottleneck needs to be addressed (BEDS Study) since there is a perception that SKIA is too far from PSNS and Gorst is a choke point. Is US Navy’s position that Gorst restricts SKIA access based on fact or perception?</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                  | 15       |
| Greenhouse Gases – Goal GG                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |          |
| <ul style="list-style-type: none"> <li>The Port understands the origin of the grant to complete this subarea plan with one of the major objectives to reduce GHG by 30% compared to traditional industrial developments. Care should be taken in setting goals and desired outcomes that will not discourage developers from locating within SKIA. Placing onerous requirements without significant incentives (financial or other) will kill any hope of development.</li> </ul>                                                                                                                                                                                                                 | 16       |
| <ul style="list-style-type: none"> <li>CG 3.8 should read goals not foals</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 17       |
| Utilities Goal U                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |          |
| <ul style="list-style-type: none"> <li>U1.2 Use “encourage” rather than “require” dual plumbing of buildings. This would be a huge economic impact to the developer. Facilities using this technology will need storage to hold reclaimed water. Some of these holding ponds could be significant if reclaimed water used to augment fire flow requirements for the development. Open water storage areas should be discouraged in and around the airport. What impact do water reclaim facilities have on salmon bearing streams which are fed from SKIA properties?</li> </ul>                                                                                                                  | 18       |
| Regulatory Framework                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |          |

|                                                                                                                                                                                                                                                                                 |    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| • SKIA site drawing (pg 46) appears to be in error. The 15 acres (Dean property) shown in a small block in the NW corner across from the RR tracks may not be in SKIA (to the best of our knowledge), it certainly is not Port property as shown in the color of Port property. | 19 |
| • Zoning Framework – Zone B may need to be altered due to location of Bremerton Motorsports Park.                                                                                                                                                                               | 20 |
| • Permitted Uses – Clarification needed on use of Bremerton Motorsports Park within Zone B.                                                                                                                                                                                     | 21 |
| • Development Standards, Part C Clearing Standards. Zone A, C require clearing of trees which impact all Part 77 airspace to include approach paths/approach surfaces as depicted on approved Airport Layout Plans.                                                             | 22 |

## **SKIA Planned Action Environmental Impact Statement**

### Alternatives Overview (Page 1-2)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| • There is no mention in the plan regarding the current or future status of the Bremerton Motorsports Park (BMP), a designated 4(f) activity. This activity has been a permitted use on the airport for over 50 years and provides recreational and economic impacts to the local community. The Port is working to remove the 147 acre activity from its current location (Zone A) and has signed a lease with BMP to use 247 acres of OVIP industrial land (Zone B) for racing activities. This activity needs to be addressed as it impacts Alternative 2 by decreasing available acreage for industrial development. | 23 |
| • Placement of box retail facilities within mixed use development in Area C may require coordination with FAA/Airport as Area C lies under the approach and departure paths for Bremerton National Airport.                                                                                                                                                                                                                                                                                                                                                                                                              | 24 |
| • Development within Area E may require coordination/approval with FAA/Airport as Area E lies under the approach and departure paths for Bremerton National Airport.                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 25 |
| • Greenhouse Gas Emission – Proposed Plan Feature – adoption of these strategies in current format will almost guarantee limited development within SKIA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 26 |
| • Encourage, not require all buildings meet LEED Silver or better. Public buildings should meet the Silver requirement; others should be encouraged but not required.                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 27 |
| • Implies LID is required instead of encouraged within SKIA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 28 |
| • Unless mandated by law, participation of the purchase of renewable energy credits should be voluntary and not mandated within SKIA. Placement of windmills within SKIA will need to be approved by the FAA prior to construction to ensure Part 77 airspace separation.                                                                                                                                                                                                                                                                                                                                                | 29 |
| • How can we mandate a commute trip reduction program when there is no public transportation available within SKIA or roadways (SR3) which are not designed with bike paths.                                                                                                                                                                                                                                                                                                                                                                                                                                             | 30 |
| • Land Use Plan & Policies – Will BMP require a “conditional use permit” and what additional development and performance standards would be required to ensure compatibility with industrial uses?                                                                                                                                                                                                                                                                                                                                                                                                                       | 31 |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| • Transportation – the Gorst traffic congestion needs to be addressed. Is US Navy’s position that Gorst restricts SKIA access based on fact or perception?                                                                                                                                                                                                                                                                                                                                                                                                                | 32 |
| • Alternative 2 – the widening of SR3 in the vicinity of the airport must be made on the west side from Imperial Way to north of the Cross SKIA Connector. Further widening on the east (airport) side, between these points, has the potential of encroaching on the runway safety area (between the runway and SR3) which may require displacement of the threshold and reducing the overall length of the runway. This would have an immediate negative impact on airport operations for jet aircraft into the region.                                                 | 33 |
| • Water & Wastewater – Alternative 1 – What does “expand locally” mean? Would not the Port be better served if the Port connected to a wastewater facility under Alternate 2 & 3, instead of incrementally investing and improving the site in Alternative 2?                                                                                                                                                                                                                                                                                                             | 34 |
| • Alternative 3 indicates the Port’s wastewater treatment facility would connect to the City of Bremerton’s system. The Port is currently under agreement with the City of Port Orchard to provide wastewater treatment support for SKIA. Please clarify how the City’s position and how it will force the Port to vacate its agreement with Port Orchard?                                                                                                                                                                                                                | 35 |
| • Environmental Review (Page 2.8) Other Environmental Review – Should the Bremerton Motorsports Park be listed under this paragraph as it will undergo its own environmental review with the City?                                                                                                                                                                                                                                                                                                                                                                        | 36 |
| • Section 2.7 Major Issues to Resolve (Page 2-20) Bremerton Motorsports Park should be added to this paragraph as a major item that needs City resolution.                                                                                                                                                                                                                                                                                                                                                                                                                | 37 |
| • Greenhouse Gas – Summary of Significant Impacts (Page 3.2-13) Are the GHG emission impacts and required mitigation measures for Alternatives 2 & 3 so significant that the potential downside is that no one will develop in SKIA because it is too regulated and therefore too costly to do business in SKIA? Is this the right direction for SKIA, or does it place us at an economic disadvantage when compared with other MIC’s in the Puget Sound area?                                                                                                            | 38 |
| • SKIA Land Use Classification Graph (Page 3.3-3) Need to add Bremerton Motorsports Park (247 acres)                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 39 |
| • Figure 3.3-3 (page 3.3-5) SKIA site drawing is in error. The 15 acres (Dean property) shown in a small block in the NW corner across from the RR tracks is not in SKIA.                                                                                                                                                                                                                                                                                                                                                                                                 | 40 |
| • Land Use Compatibility – Airport (page 3.3-7) third bullet stream should read <i>steam</i> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 41 |
| • Plans and Policies – City of Port Orchard Comprehensive Plan (page 3.3-11) “Following the 2009 annexation, the City of Bremerton has assumed responsibility for sanitary sewer service to the SKIA study area.” This statement is in conflict with an existing interlocal agreement between the Port of Bremerton and City of Port Orchard dated 29 December 2003 in which the City of Port Orchard assumed wastewater service for the service area Zone A & B. Please clarify the City of Bremerton’s assumption of responsibility over an existing binding agreement? | 42 |
| • Land Use Compatibility – (page 3.3-21) Need to clarify industrial zoned land and its compatibility with Bremerton Motorsports Park.                                                                                                                                                                                                                                                                                                                                                                                                                                     | 43 |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |    |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| <ul style="list-style-type: none"> <li>Population and Employment (page 3.3-30) Any development within SKIA, under Alternatives 2 &amp; 3, “Clean Tech” clusters should not be at the exclusion of other industrial opportunities. Recent history (SEED) and current trends confirm that development in the clean tech sector is lagging in this area. If this industry becomes SKIA’s sole focus, then potential other markets may be missed.</li> </ul>                                                                                                  | 44 |
| <ul style="list-style-type: none"> <li>Previous Archaeology (page 3.4-3,4) The Port does not agree that archaeology sites are “common” within the study area. Table 3.4-1 show sites “off” the study area. There have been studies performed within the SKIA study area, why are they not shown? Sub-terrain testing before development should only be required upon direction of the State DAHP.</li> </ul>                                                                                                                                              | 45 |
| <ul style="list-style-type: none"> <li>Mitigation Measures (Page 3.4-7) In light of several past projects where DAHP have been involved, and have found no findings (Cross SKIA Connector Phase 1 &amp; 2, Runway Rehabilitation Phase 1 &amp; 2, Norseland Remediation), these mitigation factors appear onerous and unnecessary.</li> </ul>                                                                                                                                                                                                             | 46 |
| <ul style="list-style-type: none"> <li>Utilities (page 3.8-1) Wastewater - In 2010, the Port’s treatment facility treated an average of 24,000 gallons per day or 33% of its rated capacity.</li> </ul>                                                                                                                                                                                                                                                                                                                                                   | 47 |
| <ul style="list-style-type: none"> <li>Mitigation Measures – Water &amp; Wastewater (page 3.8-12) mitigation measures assume City of Bremerton is lead agency for waste water. These assumptions are in conflict with an existing interlocal agreement between the Port of Bremerton and City of Port Orchard dated 29 December 2003 in which the City of Port Orchard assumed wastewater service for the service area Zone A &amp; B. Please clarify the City of Bremerton’s assumption of responsibility over an existing binding agreement?</li> </ul> | 48 |

## Response to DEIS Letter 1: Port of Bremerton

1. **FAA Requirements.** The Subarea Plan comment is noted. Protection, restoration and enhancement of open bodies of water in a manner that is consistent with FAA requirements is supported by the City. As noted in policy U 2.1, the Subarea Plan supports use of LID stormwater treatment, except where soils are not conducive to infiltration.
2. **Balanced Economic Strategy.** The Subarea Plan comment is noted.
3. **Bremerton National Airport.** The Subarea Plan comment is noted. A new strategy (ED 2.10) recognizing the importance of the Bremerton National Airport and supporting continued partnerships in future economic development outreach has been added to the Draft Subarea Plan.
4. **Partnership with PSNS.** The Subarea Plan comment is noted. Implementation of Strategy ED 2.5 would promote partnering with the US Navy to attract and retain subcontractors that support military needs.
5. **Sustainability.** The Subarea Plan comment is noted. Long-term sustainability of the SKIA Subarea is a primary objective of the City in undertaking this project. As described in the EIS, key objectives of this project include the following:
  - Enhance sustainability and reduce greenhouse gas emissions
  - Incorporate low impact development standards
  - Provide environmental stewardship
  - Incorporate green and sustainable infrastructure
  - Provide regional leadership in sustainable economic development

In addition, the Climate Showcase Communities grant from the US Environmental Protection Agency that was awarded for this project was specifically intended to develop policies and programs to support sustainability and reduce greenhouse gas emissions; integrate green/low impact development techniques; and support green economic development.

6. **Sustainability.** The Subarea Plan comment is noted. Please see response to Comment 5 in this letter.

7. **Funding for Economic Development.** The Subarea Plan comments are noted and it is agreed that future economic development activities will require an allocation of resources. Funding for infrastructure is described in the capital facilities plan, including in the Subarea Plan. Identification and allocation of resources for future economic development is a key implementation step that will be considered by the City of Bremerton, in partnership with other stakeholders.
8. **Sustainability and Financial Feasibility.** The Subarea Plan comment is noted. Please see the response to Comment 4 in this letter. To the extent possible, sustainability measures proposed in the Draft Subarea Plan have focused on measures that are generally known to be cost effective in the short or long-term.
9. **Environmental Performance.** The Subarea Plan comment is noted. The strategies identified Goal ED 3 are intended to provide information about successful businesses in SKIA.
10. **Sustainability and Financial Feasibility.** The Subarea Plan comment is noted. Please see the response to Comment 4 in this letter.
11. **Foreign Trade Zone.** The Subarea Plan comment is noted. A strategy supporting the use the Free Trade Zone has been included in the Draft Subarea Plan as Strategy ED 2.11.
12. **Bremerton Motorsports Park.** It is noted that the Bremerton Motorsports Park is a potential tenant in this area. The goals and strategies would not preclude this development.
13. **Use Designations.** A large industrial aviation complex would be permitted in either the industrial or heavy industrial designation. Please see the revised draft regulations, which have simplified the use regulations.
14. **Rail Access.** The Subarea Plan comment is noted.
15. **Gorst Traffic Congestion.** Potential future impacts to the intersection of SR 3 / SR 16 / Sam Christopherson Avenue in Gorst were analyzed under all development scenarios. The position or perception of the US Navy is not a component of the environmental impact assessment.

16. **Greenhouse Gas Reduction.** The Subarea Plan comment is noted. To the extent possible, greenhouse gas reduction measures proposed in the Draft Subarea Plan have focused on measures that are cost effective in the short or long-term.
17. **Typographical Error.** The typographical error in Strategy GG 3.6 of the Subarea Plan has been corrected to read "goals" not "foals".
18. **Dual Plumbing.** The draft regulations anticipate creating an incentive for the installation of dual plumbing where the site may be served by a reclaimed water system. Please see Section D, Chapter 5.080, in the Draft Subarea Plan.
19. **SKIA Boundary.** The referenced property is correctly shown as part of SKIA. The shading shown in Figure 6 was intended to indicate that the property is within a Port Industrial zone, but not that the property is owned by the Port of Bremerton.
20. **Bremerton Motorsports Park.** The Subarea Plan comment is noted. Development of the Bremerton Motorsports Park in Area B is not precluded.
21. **Bremerton Motorsports Park.** The draft regulations are not expected to preclude the Bremerton Motorsports Park.
22. **FAA Part 77 and Clearing Standards.** The Subarea Plan comment is noted. Please see the updated Draft Regulations in the Draft Subarea Plan. Clearing standards are consistent with the requirements of FAA Part 77, which supersedes local land use regulation.
23. **Bremerton Motorsports Park.** The comment is noted. The alternatives described would not preclude the Bremerton Motorsports Park.
24. **Airport Compatibility in Area C.** The draft regulations would require compliance with FAA regulations and consultation with the Port of Bremerton for any development within Airport Compatibility Zones 1-6 as defined by the Washington State Department of Transportation's Airports and Compatible Land Use Guidebook.
25. **Airport Compatibility in Area E.** Please see the response to Comment 24, this letter.
26. **Greenhouse Gas Reduction Strategies.** The comment is noted. To the extent possible, greenhouse gas reduction measures proposed

in the Draft Subarea Plan have focused on measures that are generally known to be cost effective in the short or long-term.

27. **LEED Standard.** The comment is noted.
28. **LID Standards.** The Draft Subarea Plan proposed that Low Impact Development standards be encouraged (see Draft strategies GG 4.1 and U 2.1). This strategy has been carried forward into the draft development regulations, please see Section C, Chapter 4.090, in the Draft Subarea Plan.
29. **Renewable Energy Development.** The comment is noted.
30. **Commute Trip Reduction.** WSDOT's commute trip reduction program contains several elements available to SKIA currently, including carpool and vanpool. Additionally while no public transportation routes currently operate within the SKIA site, it is reasonable to assume that such service would commence following further site development.
31. **Bremerton Motorsports Park.** Please see Section C in the Draft Subarea Plan for development regulations in the Port Industrial Mix zone.
32. **Gorst Traffic Congestion.** Potential future impacts to the intersection of SR 3 / SR 16 / Sam Christopherson Avenue were analyzed. The position or perception of the US Navy is not a component of the environmental impact assessment.
33. **Roadway Improvements and Airport Compatibility.** Comment has been noted. Note that the design of any roadway improvements will be part of a separate process and potential impacts to the airport and other users will be considered at that time.
34. **Water and Wastewater.** Alternative 1 assumed a low level of growth that would eventually lead to expansion of the collection system within the port property and improvements to the lagoon system. But it did not appear that that lower level of growth would support an investment in a larger regional system. In the development of Alternative 2 as the preferred alternative the approach is that the port properties would be connected to a regional system.
35. **Urban Services.** Alternative 3 followed the approach shown in the City's SKIA sewer study. The City of Bremerton has the

responsibility/obligation under the Growth Management Act to provide all public services and utilities to within the City. The MOU was developed prior to annexation to the City of Bremerton and upon annexation; the Growth Management Act establishes that the City is responsible for all urban services, as defined in WAC 365-196-320. Consistent with GMA requirements, the City must include in their capital facilities element a plan to provide adequate public facilities to all urban areas.

36. **Bremerton Motorsports Park.** The reference to other environmental review was primarily to note that preparation of a separate EIS was ongoing concurrent with preparation of the SKIA planned Action EIS. Future environmental review of the Bremerton Motorsports Park will occur in accordance with City of Bremerton requirements.
37. **Bremerton Motorsports Park.** The major issues to be resolved topic is intended to identify issues to be addressed in making decisions about the Subarea Plan and implementing measures. Because the Bremerton Motorsports Park is not precluded by the Plan or the proposed regulations, it is not a major issue to be resolved.
38. **Greenhouse Gas Reduction and Financial Feasibility.** This section lists potential mitigation measures that help achieve the goal of a 30% reduction from baseline in GHG emissions. Specific mitigation methods may subsequently be refined by the City of Bremerton. While certain mitigation measures may make development more costly, other measures (such as LID, compact development, and energy efficiencies) will likely not result in significant additional costs, especially over the long term. Additionally, such standards may make the development more attractive to certain industry segments.
39. **Bremerton Motorsports Park.** Table 3.3-1 lists land use categories based on specific data provided by the Kitsap County Assessor. Bremerton Motorsports Park (BMP) is currently located in Area A (Bremerton National Airport, owned by the Port of Bremerton) and information available on the BMP website indicates that they currently lease 125 acres from the Port of Bremerton. The Assessor did not break out BMP as a separate land use category from the airport. A note has been added to the bottom of Table 3.3-1 that:

The Kitsap County Assessor's land use category *Aircraft Transport* includes 125 acres leased to Bremerton Motorsports Park for racing and driving events.

The following sentence has also been added to paragraph 1 on page 3.3-3:

Bremerton Motorsports Park (BMP) currently leases 125 acres in the eastern portion of the Bremerton National Airport property, and currently uses an inactive airport runway for its operations. BMP has no permanent facilities, but hosts drag races, road races and other driving events on ¼ mile drag strip and a temporary, 1.1 mile-long road course.

40. **SKIA Boundary.** We have reviewed Figure 3.3-3 and other figures showing the boundary of the South Kitsap Industrial Area. We received this map boundary data from the City of Bremerton and they have confirmed that while the property in question is not on Port property, it is located within the boundaries of SKIA.
41. **Typographical Error.** We have corrected the typographical error on page 3.3-7. The sentence now reads:
  - Power plants and other facilities that generate ~~stream~~ steam or thermal plumes
42. **Urban Services.** The City of Bremerton has annexed this area and has assumed responsibility for all urban services, including wastewater service, to this area. Please see the response to Comment 35 in this letter, above.
43. **Bremerton Motorsports Park.** The proposed Bremerton Motorsports Park (BMP) could pose potential concerns with regards to the compatibility of a large commercial recreation and entertainment use with existing and potential future industrial development, depending on the design, location and operation of the BMP facility. The development of the proposed BMP facility is not specifically analyzed in the EIS and will not be covered under the Planned Action. The following edits have been made to text on page 3.3-21:

In addition to allowing light industrial, heavy industrial, recycling, outdoor storage, warehousing and transportation facilities, a variety of other uses are allowed in SKIA. These include: *automobile service and repair, car wash, drive-through facility, gas station, general office*

*and business services over five thousand gross square feet, kennel, nursery and greenhouse, public administration, outdoor athletic fields, stadiums and sports complexes, veterinary clinics and wireless communication facilities. At least three of these pose potential incompatibilities or conflicts with industrial uses anticipated for SKIA. General office, public administration and stadiums and sports complexes raise potential compatibility concerns when located near industrial uses. "Un-related office uses" are specifically identified in the current PSRC MIC Designation Criteria as a concern. Notably, the Industrial zone in Bremerton does not allow general retail or residential as permitted uses, consistent with PSRC policies. Group Residential Facilities are allowed with a Conditional Use Permit "only if the facility will not create an operational conflict with the efficiency of large-scale industrial uses".*

*(paragraph break inserted)*

Although not called out by the PSRC in their policy or administrative documents, recreation uses, such as sports stadiums or motorsports facilities could pose potential compatibility issues with industrial uses if located in close proximity. Impacts could include traffic associated with sporting events disrupting the movement of goods, customers and employees. Recreation uses that include significant outdoor lighting, tall structures and/or large numbers of spectators could also pose potential concerns with regards to airport operations. Industrial uses in close proximity to spectators could also raise concerns about noise and emissions.

The current Bremerton Motorsports Park (BMP) is located along the eastern boundary of the Bremerton National Airport property (Area A) and utilizes an inactive runway for its operations. Site access is provided via SW Old Clifton Road. The current location is not located near any active industrial or commercial use, and no existing land use compatibility impacts have been noted at this site.

The current BMP facility will be displaced by the construction of future phases of the SKIA Connector Road. BMP and the Port of Bremerton are currently in negotiations regarding a new facility that may be constructed on approximately 250 acres of Port property in Area B. Preliminary plans indicate the potential for a 1/4 mile drag strip, paved oval track, paved space for autocross events, area for motocross events, 1.5 - 2.5 mile road racing course, an RV Park and parking for approximately 5,000 vehicles. BMP also hopes to include additional development, such as offices, garage space, meeting rooms, covered grandstands, areas for related commercial activity

and additional fan amenities, according to information provided on the BMP website. BMP has indicated in a letter that most events would be on weekends and evenings during times when most businesses in SKIA are closed or less active.

While the proposed BMP facility would be expected to act as a draw for certain businesses, the proposed BMP facility has the potential to result in compatibility impacts with adjacent and future industrial development, depending on the final location and design of the facility. Specific mitigation, including (but not limited to) transportation improvements, access restrictions and other measures to ensure freight mobility and address traffic congestion could address potential impacts. In addition, location and design of the BMP should consider limitations on operating hours, setbacks and landscape buffers, and the need for future industrial access to the rail line. Impacts and mitigation associated with the BMP would need to be addressed through a separate SEPA analysis. (paragraph break added)

~~Notably, the Industrial zone in Bremerton does not allow general retail or residential as permitted uses, consistent with PSRC policies. Group Residential Facilities are allowed with a Conditional Use Permit "only if the facility will not create an operational conflict with the efficiency of large-scale industrial uses".~~

44. **Balanced Economic Development.** As the comment notes, sustainable industrial development is a primary goal of this project. Please see the response to Comment 5 of this letter, above. However, the SKIA Subarea Plan does not contemplate that the focus of economic development in SKIA would be limited exclusively to the clean tech section. In particular, please see Goal ED 2, which states as a goal "Recruit, grow and retain a wide spectrum of industrial employment opportunities in SKIA." Supporting strategies speak to providing a focused balance on traditional industrial activities and the emerging clean tech sector, supporting small businesses and other strategies that would be appropriate for a wide range of industrial employment.
45. **Cultural Resources.** As described on Draft EIS page 3.4-3, about 150 acres in the SKIA subarea have been surveyed and there are no identified archaeological sites in the study area. Therefore, Table 3.4-1 shows only sites outside of the study area.

The Draft EIS does not say that archaeological sites are common in the study area, but only that the types of landforms that typically

contain archaeological sites (ie shorelines, terraces and adjacent to existing or extinct aquatic features) are common in the study area and surrounding vicinity.

46. **Cultural Resources Mitigation.** The comment is noted.
47. **Wastewater.** Comment noted. The following sentence has been added to the last paragraph on page 3.8-1: The Port of Bremerton reported that in 2010, the Port's treatment facility treated an average of 24,000 gallons per day or 33% of its rated capacity.
48. **Urban Services.** City of Bremerton has the responsibility/obligation under the Growth Management Act to provide all public services and utilities to within the City. The MOU was developed prior to annexation to the City of Bremerton and upon annexation; the Growth Management Act establishes that the City is responsible for all urban services, as defined in WAC 365-196-320. Consistent with GMA requirements, the City must include in their capital facilities element a plan to provide adequate public facilities to all urban areas.



# KITSAP COUNTY BOARD OF COMMISSIONERS

*Efficient, accessible and effective county services*

July 19, 2011

Robert Gelder  
DISTRICT 1

Charlotte Garrido  
DISTRICT 2

Josh Brown  
DISTRICT 3

Mayor Patty Lent  
City of Bremerton  
345 6th Street, Suite 600  
Bremerton, WA 98337

Dear Mayor Lent:

Thank you for the opportunity to comment on the Draft South Kitsap Industrial Area (SKIA) Sub-Area Plan being prepared by the City of Bremerton. This Plan will help guide the SKIA into the future as it grows into a key employment center for Kitsap County providing opportunities for high-tech jobs and family wages.

Kitsap County supports Alternative 3 as detailed in the Draft Environmental Impact Statement (DEIS). This alternative provides the multiple benefits to Kitsap County:

1

- Includes an aggressive jobs target consistent with SKIA's designation as a Regional Growth Center by the Puget Sound Regional Council.
- Maintains the area's focus as a high-tech employment center. Its zoning, while flexible, will limit any other types of uses that may conflict with this focus.
- The Plan is largely consistent with the goals and targets of the 2003 SKIA Plan that established the SKIA UGA.
- Ensures adequate infrastructure to serve SKIA when it reaches full build-out at the intensity appropriate for its size (over 3,500 acres).

The Plan also includes innovative development standards providing for low-impact site development, water reuse and green building techniques. These elements can benefit both future development and the County's environment. However, while such techniques will make the area attractive and will provide a draw for clean-tech companies, they must be carefully balanced with their potential development costs when assessing the marketability of the SKIA area that faces other real and perceived obstacles to development.

Also, attached is a comment letter provided by the Department of Public Works regarding specific elements of the DEIS. These issues are generally related to transportation methodology and consistency between jurisdictions.

Again, thank you for the opportunity to comment. This Plan will be an important blueprint for SKIA's future and we look forward to additional collaboration as the plan moves towards adoption.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charlotte Garrido", with a long horizontal flourish extending to the right.

Charlotte Garrido, Chair

cc: Department of Community Development  
Public Works  
Special Projects

## Response to DEIS Letter 2: Kitsap County Board of County Commissioners

---

1. **Support Alternative 3.** The comment is noted.

**SKIA comments – Transportation Chapter (3.6)**

June 28, 2011

(Submitted by Greg Cioc, Kitsap County Dept. of Public Works, Transportation Planning Division)

**General Comments**

- |                                                                                                                                                                                                                                                                                                                                                                      |   |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|
| 1. If Alt 1 is selected, check with PSRC to determine that 1,400 employees is sufficient ratio to keep the Regional Manufacturing/Industrial Center status. This could be a critical issue.                                                                                                                                                                          | 1 |
| 2. Analysis of the intersection LOS: Neither Kitsap County, City of Port Orchard or the City of Bremerton has adopted a Level of Service Standards for Intersections. While the analysis strongly focuses on intersection LOS, these jurisdictions may have difficulty enforcing mitigation if the intersection LOS is not an adopted standard in each jurisdiction. | 2 |
| 3. All figures were very difficult to read ie. too small.                                                                                                                                                                                                                                                                                                            | 3 |
| 4. There are many references made to the BEDS study; some say Draft BEDS and others leave out the Draft. As of this date, the BEDS study has not been released. Contact Richard Warren at <a href="mailto:warren@wsdot.wa.gov">warren@wsdot.wa.gov</a> for exact wording.                                                                                            | 4 |
| 5. Check the spelling of Sedgwick Road throughout the document; often misspelled 'Sedgewick'.                                                                                                                                                                                                                                                                        | 5 |

**Specific Comments:**

| Page   | Paragraph | Comment                                                                                                                                                                                            |    |
|--------|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| 1-30   | P1        | There are <u>not</u> significant <u>unavoidable</u> ... (double negative). Clarify this sentence. Eg. There are no significant unavoidable ... or<br>Transportation and utilities are the only ... | 6  |
| 3.6-2  | last P    | typo – Cross SKIA connector is a new two lane road <u>that is</u> that extends ...<br>Three-foot wide shoulders that can accommodate bicycle travel. 3' is less than standard; check this width.   | 7  |
| 3.6-5  | P2        | As stated above, Kitsap County, City of Bremerton and City of Port Orchard have not adopted an intersection LOS.                                                                                   | 8  |
| 3.6-7  | P1        | What actual time was used for the PM peak hour traffic counts ie. 3-4p, 4-5p, 5-6p?                                                                                                                | 9  |
| 3.6-11 | figure    | Emphasize the runway and airport property in the photo. Very difficult to see where the runway ends and where there is developable property in the photo.                                          | 10 |
| 3.6-14 | P4        | Alternatives 2 and 3: I would be concerned that the FAA will allow development off the end of the runway, but it depends how far away and it is up to the FAA to comment.                          | 11 |
| 3.6-23 | Table     | I would bold the LOS (F) in the 2 columns.                                                                                                                                                         | 12 |
|        | Last P    | 'While not required for this EIS, recommendations to improve ... Why is it not required in this EIS? Would this mitigation be handled as development occurs?                                       | 13 |

|        |         |                                                                                                                                                                                                                                                                                                                                                                                                           |    |
|--------|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| 3.6-25 | P2      | Bike discussion: The County understands the Complete Streets concept, but complete streets and extensive bike facilities in this area are suspect. For one, how are employees going to bike to the SKIA complex if SR3 is as congested as it appears it will be? Perhaps selective biking facilities or even an emphasis on a recreational biking facility such as a velodrome might be more appropriate. | 14 |
| 3.6-26 | P2      | As stated above, Kitsap County, City of Bremerton and City of Port Orchard have not adopted an intersection LOS.                                                                                                                                                                                                                                                                                          | 15 |
| 3.6-31 | sidebar | Does the analysis of “capacity to absorb” take into consideration ambient growth at the shipyard or other off-site growth?                                                                                                                                                                                                                                                                                | 16 |
| 3.6-32 | P1 1.   | SR3/Old Clifton Road: Technically, SR3 and Old Clifton Road do not intersect. The road sign past the roundabout states that the main road is called “Airport Way” and a side road is called “Bree Drive”.                                                                                                                                                                                                 | 17 |
| 3.6-37 | P3      | SKIA Site Access Evaluation: some discussion should occur regarding the state’s access rights. Will the state DOT allow 5 new accesses into the SKIA site?                                                                                                                                                                                                                                                | 18 |
| 3.6-41 | P2      | This paragraph ends the chapter abruptly. Is there a conclusion to be drawn that Alternatives 2 and 3 are infeasible? Is the reader to conclude that ONLY Alternative 1 is realistic.                                                                                                                                                                                                                     | 19 |

## Response to DEIS Letter 3: Kitsap County Department of Public Works, Transportation Planning Division

1. **Alternative 1.** The comment is noted. Please note that Alternative 1 has not been selected as the Preferred Alternative.
2. **Level of Service Standard.** Intersection LOS analysis was used as a conservative measure of delay as this method is generally most sensitive to impacts resulting from increases in vehicle trips. In general, the segment LOS methods cited in the comment are simplified approaches that seek to measure the same type of traffic congestion that is measured by intersection LOS, and therefore the two methodologies (intersection and segment) are measuring the same thing. The intersection LOS method of analysis does not require any change to current city or county mitigation and monitoring practices and these agencies can continue to use their standard approach to monitoring traffic congestion.
3. **EIS Figures.** The comment is noted. All figures in the Final EIS have been expanded for visibility.
4. **Draft BEDS.** At time of writing, BEDS study was in draft format. Report should indicate that references made are to Draft BEDS report.
5. **Typographical Error.** On page 1-7, the section references 'Sedgewick Road.' This was a typo and the report should reflect 'Sedgwick Road.'
6. **Typographical Error.** The referenced sentence is corrected to read as follows: "There are no significant unavoidable adverse impacts identified in any of the elements of the environment except transportation and utilities."
7. **Roadway Shoulder Width.** The width reference addresses the currently constructed portion of the Cross SKIA Connector. Five feet is generally the minimum size for a bicycle lane (and officially for the City of Bremerton, per Standard Drawing 3001). However the existing three foot shoulder does provide a basic level of accommodation for cyclists.
8. **Level of Service Standard.** Intersection LOS analysis was used as a conservative measure of delay as this method is generally most sensitive to impacts resulting from increases in vehicle trips. In general, the segment LOS methods cited in the comment are simplified approaches that seek to measure the same type of traffic

congestion that is measured by intersection LOS, and therefore the two methodologies (intersection and segment) are measuring the same thing. The intersection LOS method of analysis does not require any change to current city or county mitigation and monitoring practices and these agencies can continue to use their standard approach to monitoring traffic congestion.

9. **Traffic Counts.** Counts were recorded from 4:00 PM – 6:00 PM as this time slot generally captures the PM peak hour of traffic volume. Counts were recorded in 15 minute increments and the peak hour at each intersection was used for analysis. This peak hour was generally 4:15 PM – 5:15 PM.
10. **Runway Location.** The figure uses a color index to indicate areas most suitable for building. The darker red areas include both the airport runway and approaches. Additional detail will be provided at the time a building permit is pursued to interested parties located near the runway.
11. **Development and Airport Compatibility.** All final site development plans will be subject to approval by the City of Bremerton and, where appropriate the FAA.
12. **Table Format.** Those intersections found to be operating with unsatisfactory levels of delay in 2030 No Action conditions are provided in a bulleted list immediately below the table. The bold text in subsequent tables identifies impacts as a result of the development scenario.
13. **Intersection Mitigation.** This particular section references intersections that are projected to operate with unsatisfactory levels of delay in the 2030 No Action conditions. This scenario assumes that the existing trend of development under existing land use and general plan designations in SKIA continues. Mitigation is discussed for Alternatives 2 and 3 where there is a proposal to allow further industrial and commercial development beyond that which is currently planned.
14. **Bicycle Facilities.** The bicycle facilities are a recommendation, and are consistent with the existing facilities constructed with the Cross SKIA Connector. The facilities recommended could potentially serve as a catalyst for future regional trail development and provide a means for non-automotive internal circulation between SKIA sites.

15. **Level of Service Standard.** Intersection LOS analysis was used as a conservative measure of delay as this method is generally most sensitive to impacts resulting from increases in vehicle trips. In general, the segment LOS methods cited in the comment are simplified approaches that seek to measure the same type of traffic congestion that is measured by intersection LOS, and therefore the two methodologies (intersection and segment) are measuring the same thing. The intersection LOS method of analysis does not require any change to current city or county mitigation and monitoring practices and these agencies can continue to use their standard approach to monitoring traffic congestion.
16. **Background Growth.** The 2030 No Action conditions include reasonably foreseeable growth in the immediate area included in the 2030 Puget Sound Regional Council Travel Demand Model.
17. **SR 3/Old Clifton Road.** This section is discussing the intersection of NE Old Clifton Road and SR 3 in Belfair, WA.
18. **Access and SR 3.** Any access roads on SR 3 will be subject to WSDOT approval in accordance with their Access Management Policies. Assumed roadway access alignments emphasize use of existing access points and add additional points in accordance with WSDOT standards.
19. **Feasibility of Alternatives.** While the report does identify significant and unavoidable impacts, specific development and potential mitigation strategies will need to be developed by the City of Bremerton working in coordination with WSDOT. Alternatives may include additional mitigation measures or revision of LOS standards.



PO Box 5046, Bremerton, WA 98312  
www.bremertonmotorsportspark.com

RECEIVED  
City of Bremerton

Letter 4

JUL 21 2011

Department of  
Community Development

July 21, 2011

Ms. Andrea Spencer, Director  
City of Bremerton SEPA Responsible Official  
Community Development Department  
345 6<sup>th</sup> Street, Suite 600  
Bremerton, WA 98337

Re: SKIA Draft EIS & Subarea Plan  
Public Comment

Dear Ms., Spencer:

Thank you for including our comments below into the record regarding the SKIA Draft EIS and Subarea Plan. As you know, the Bremerton Motorsports Park (BMP) has been in on-going negotiations with the Port of Bremerton and designing plans to locate an approximately 232 acre motorsports park on Port property south of Imperial Way and west of State Route 3 (Area "B" identified in the DEIS). We have reviewed the documents, and would like to offer the following comments:

DEIS: Streams/Figure 3-1.6

While performing site reconnaissance last winter, the BMP engaged the services of Wayne Daley (Daley Design), a reputable fisheries biologist, to assess the topographic depression which the DEIS appears to refer to as the "North East Fork Union River" on Page 3.1-2.1. Mr. Daley concluded that there is no evidence of a stream channel across the BMP proposed lease area. Daley's findings are enclosed for your review and hopeful end to any reference that this part of the property is a fish bearing stream, or even a stream.

DEIS: Existing Land Use (Page 3.3-1)

The Bremerton Motorsports Park has been a permitted use for over 50 years at its current location at the airport, providing recreational and economic opportunities for the community. Yet the BMP's existing facilities are not even acknowledged anywhere in the DEIS.

DEIS: Land Use Patterns (Page 3.3-19)

The Land Use Analysis should be revised to include and acknowledge the 232 Acre Bremerton Motorsports Park in Area B throughout the DEIS.

1

2

3

Ms. Andrea Spencer, Director  
City of Bremerton SEPA Responsible Official  
Community Development Department  
July 21, 2011  
Page Two

DEIS: Land Use Compatibility (Page 3.3- 20&21)

The DEIS states, in part, that "...outdoor athletic fields, stadiums, and sports complexes raise potential incompatibilities or conflicts with industrial uses anticipated for SKIA", and "Impacts could include traffic associated with sporting events disrupting the movement of goods". We would like to mention that the majority of events at the BMP take place on the weekend and after work-day hours.

4

DEIS: Employment and Population (Page 3.3-24)

The employment figures for Area B need to be revised to reflect the 232 acre park and it is anticipated that the project will employ up to 85 full and part-time personnel.

5

DEIS: Transportation (Chapter 3.6)

The BMP will be providing a Traffic Impact Analysis in the near future at the time of formal submittal of our project to the City. The DEIS authors may wish to account for the inclusion of the park in their Area B Trip Generation Analysis.

6

SUBAREA PLAN: Land Use

We would prefer that the current 50-year history of the Motorsports Park be reflected and its relocation to Area B be acknowledged by the Subarea plan. This 232 acre project needs to be addressed as it impacts the goals and strategies of SKIA as well as the availability of land.

7

SUBAREA PLAN: Waterways

Based on the Daley findings attached, the definition of the "Northeast Fork Union River" needs to be revised to "stream segments with gradient and culverts are identified downstream of SKIA".

8

SUBAREA PLAN: Greenhouse Gases

We would like to comment on what may appear to be a conflict between our project and the greenhouse gas reduction goal of the Subarea plan. One of the many benefits of providing a facility such as the Bremerton Motorsports Park is that the facility provides a venue for automobile and automobile part manufacturer's research and development of new clean technologies. We expect that the Park will encourage industrial tenants to locate within SKIA for the opportunities to test new clean technologies.

9

SUBAREA PLAN: Capital Facilities

Our project intends to be a model of incorporating Low Impact Development stormwater strategy integration in a motorsports-park setting.

10

Ms. Andrea Spencer, Director  
City of Bremerton SEPA Responsible Official  
Community Development Department  
July 21, 2011  
Page Three

SUBAREA PLAN: Regulatory Framework

We would like clarification in the Subarea plan that the Bremerton Motorsports Park would be a permitted use within Zone B. | 11

I would also like to suggest that a sunset clause (5 years?) be incorporated into the future enabling ordinance of the SKIA Planned Action EIS and Subarea Plan in the event that the inevitable development and building cost increases associated with this sustainable and "green" approach and their associated development regulations render the SKIA unbuildable. | 12

Enclosed please find two letters endorsing our project, and thank you again for accepting our comments.

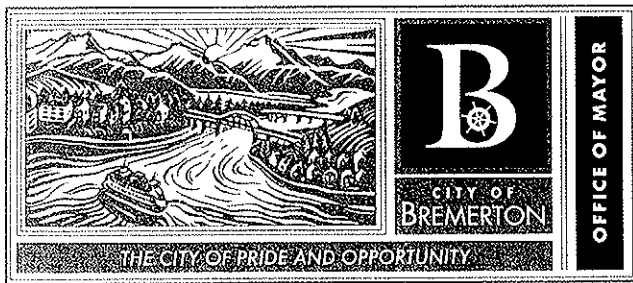
Sincerely,



Mike Burdick  
BMP Director

Enclosure(s): Daley Designs Fisheries Assessment  
Two Support Letters

MB:pf:lrs  
6440.01



Mayor Patty Lent



February 14, 2011

Aaron Capps, President  
Bremerton MotorSport Park  
5101 Autocenter Blvd.  
Bremerton WA 98312

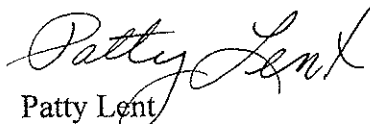
Dear Aaron:

Thank you for meeting with me to discuss Bremerton MotorSports Park's (BMP) plans to relocate its current raceway on the unused landing strip at the Bremerton National Airport to a location within the Port of Bremerton's Olympic View Industrial Park west of SR3. I thank you for sharing with me your proposal that estimates that a track expansion could create a base of 100,000 visitors annually with expectations that you could triple that number.

I am supportive of activities that encourage tourism, economic development and the creation of living-wage jobs within Kitsap County. I believe that our community's economic health is strongly tied to both ensuring the success of our existing businesses and the encouragement for the creation of new business activities.

The City is currently preparing a "sub-area plan" for the South Kitsap Industrial Area (SKIA), and during this process we are developing a new land-use code and environmental impact statement that analyzes how we can achieve job growth and realize the goal of making SKIA a manufacturing / industrial center for Kitsap County. The BMP is an activity that has been going on for more than 50-years in SKIA and I believe that your input in this planning process is vital, so I encourage you to contact my staff planner Lindsey Sehmel at 360.473.5845 or [lindsey.sehmel@ci.bremerton.wa.us](mailto:lindsey.sehmel@ci.bremerton.wa.us) to receive meeting notifications.

Sincerely,

  
Patty Lent  
Mayor



**PORT COMMISSIONERS**

Bill Mahan  
Larry Stokes  
Roger Zabinski

July 28, 2010

**CHIEF EXECUTIVE OFFICER**

Cary Bozeman

**GENERAL OFFICES**

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**BREMERTON**

**NATIONAL AIRPORT**

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**OLYMPIC VIEW BUSINESS  
AND INDUSTRIAL PARK**

(360) 674-2381

**PORT ORCHARD MARINA**

(360) 876-5535

**BREMERTON MARINA**

(360) 373-1035

Mr. Aaron Capps  
Advantage Nissan  
5101 Auto Center Blvd  
Bremerton, WA 98312

Dear Aaron,

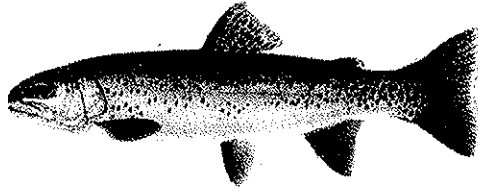
Thank you so much for the wonderful presentation your team made on your vision for the future Bremerton MotorSports Park. It is very exciting and I am sure the Port Commission and staff are looking forward to working with you and your Board to determine how we might bring this vision to reality. It will not be easy and some very tough decisions will have to be made but I am confident that by working together we can make this happen.

In the next number of weeks our staff will present to the Commissioners some ideas on how we might be able to work with the City of Bremerton, the FAA, and the adjoining communities to see how we might move forward. This will not be easy but I know the Port of Bremerton will do everything we can to support the Bremerton MotorSports Park.

Sincerely,

Cary Bozeman  
Chief Executive Officer

cc: Commissioners  
Port Attorney



*Daley Design*

1646 Jeannette Place  
Bainbridge Island, Washington 98110  
206 / 842-8195

December 21, 2010

Mr. Mike Burdick  
P.O. Box 946  
Silverdale, WA 98383

Subject: Fisheries Assessment at the Bremerton Airport

Dear Mr. Burdick:

I have completed my site evaluation and technical document assessment of the site at the Bremerton International Airport reviewing the Kitsap County environmental map designation for a fish bearing stream. Attachment A is the copy of the area in question that was forwarded to me by Pat Fuhrer, Principle at Map LTD, in Silverdale. This is an enlarged portion of the Kitsap County Critical areas and the stream and area in question have been flagged by Mr. Fuhrer. Attachment B is a topo site plan of the area in question. The flagged location shown in attachment A is south of Imperial Way and east of Constance Drive. While on site I walked south from Imperial way at a point approximately 300 yards east of Constance Drive using an old logging road. It is the open area shown between the two segments of dense trees. I walked into this wooded area a distance of approximately 500 yards. This would have taken me well beyond the location of the stream shown on the county map. There was no stream channel in this area and looking south, along the logging road I was walking on, there did not appear to be any indication of an area that would indicate the presence of a stream crossing of the road (photos attached). At a point approximately 100 yards south of Imperial Way I brush whacked approximately 50 yards to the west toward Constance Drive. Again I found no indication of a stream channel in this area. I drove south of the intersection of Imperial Way and Constance to a point just beyond the road that crosses the railroad tracks. There is a large treeless open area on the west side of Constance Drive and to the north of a propane gas storage area.

At this location I found a culvert crossing under Constance Drive with water flowing out of the forested area that is immediately to the east of Constance Drive and south of Imperial Way (photo attached). I walked into the forested area east of the culvert and I was unable to find a defined steam channel. My site visit was less than a week

following the extremely heavy rainfall in the area that was causing flooding in many of the streams and rivers in the region. The water flowed out of the culvert to the open area to the west of the road and then into a swale that led to a culvert under the railroad tracks (photo). The culvert under the railroad tracks would be classified as a total blockage for fish migration.

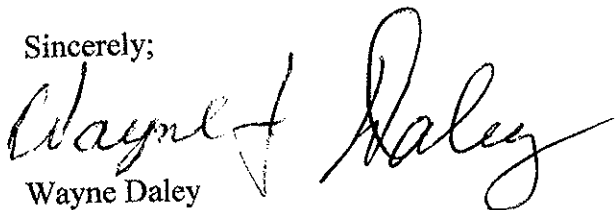
The water that was coming out of the area that the county has identified as a fish bearing stream appears to be seasonal ground water that flows out across a broad area of the forest habitat and not along a well defined streambed. Attachment C is a LiDAR topo map of the same area shown on attachment B. On both of these contour maps there is no defined topography that would indicate a stream channel in the area at the SE corner of the intersection of Imperial Way and Constance Drive.

In the area south of SW Barney White Road and east of Imperial Way (west intersection) there is, as shown in the topo maps, a ravine area that begins at the east intersection of Barney White Road and Imperial Way. There was standing water in this ravine at the east intersection. This water appears to become ground water that spreads over the area to the west as it flows out of the ravine area and to the area at the intersection of Imperial Way and Constance Drive. It is my professional opinion that none of this area is fish bearing habitat.

To confirm my findings I accessed the Washington Department of Fisheries WRIA 15 computer files (SalmonScape web site) to review the identified fish bearing streams in the area of the airport. The entire area on the north side of SR 3 and west of Imperial Way is within the Union River drainage (Attachment D). As shown on the satellite image the only fish bearing stream is located to the west of the area planned for development. The red X markings are barriers to fish migration at the railroad tracks. Attachments E and F are also printed site maps of the area as found on the WDFW web site. These figures are the streams that support coho salmon and chum salmon.

Based on the site visit and the website investigation it is my professional opinion that the County map is incorrect and there is not a fish barring stream in the area shown on the Critical Areas Map.

Sincerely;

A handwritten signature in black ink, appearing to read "Wayne Daley". The signature is fluid and cursive, with a large, stylized "W" and "D".

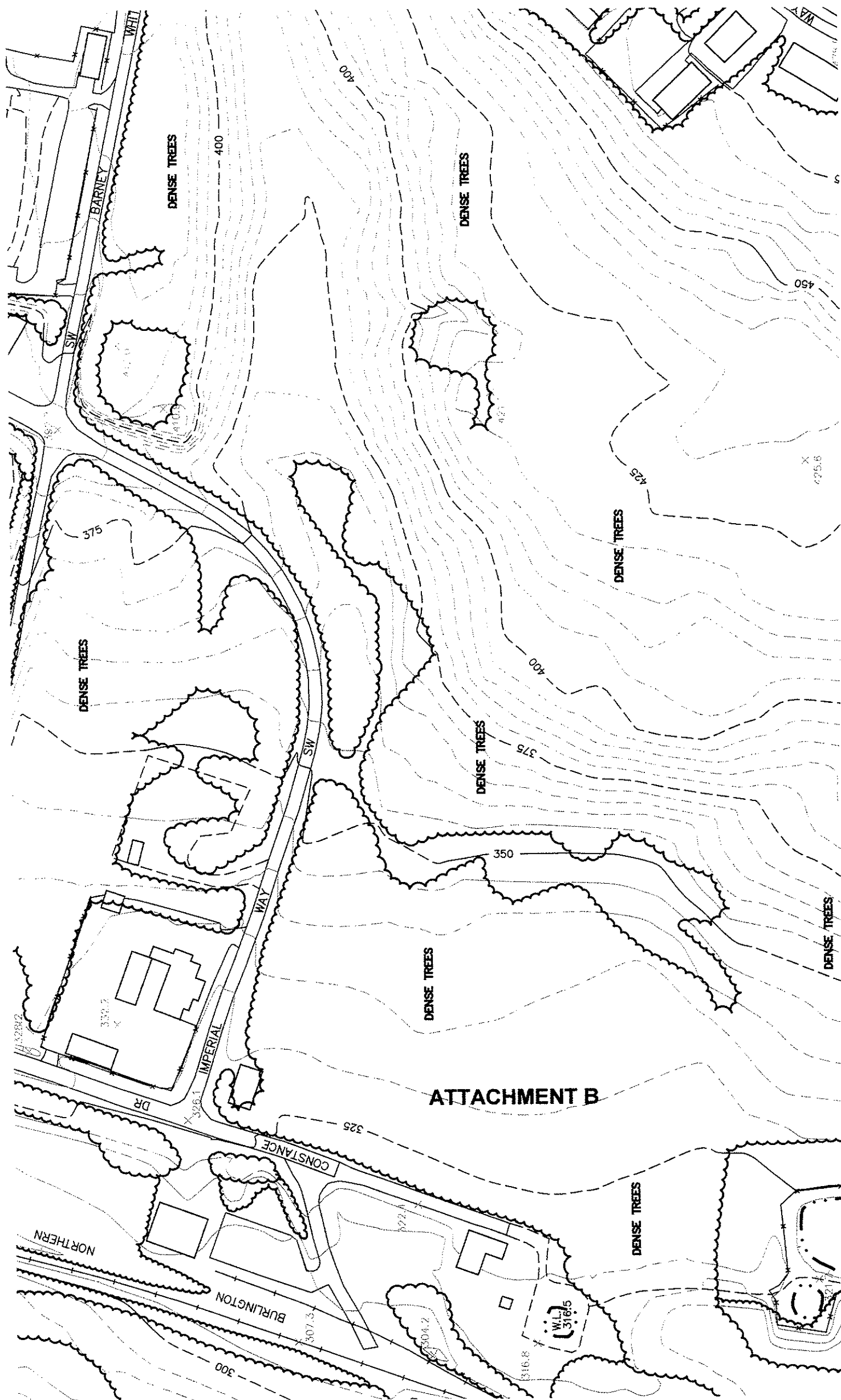
Wayne Daley  
Sr. Fisheries Biologist

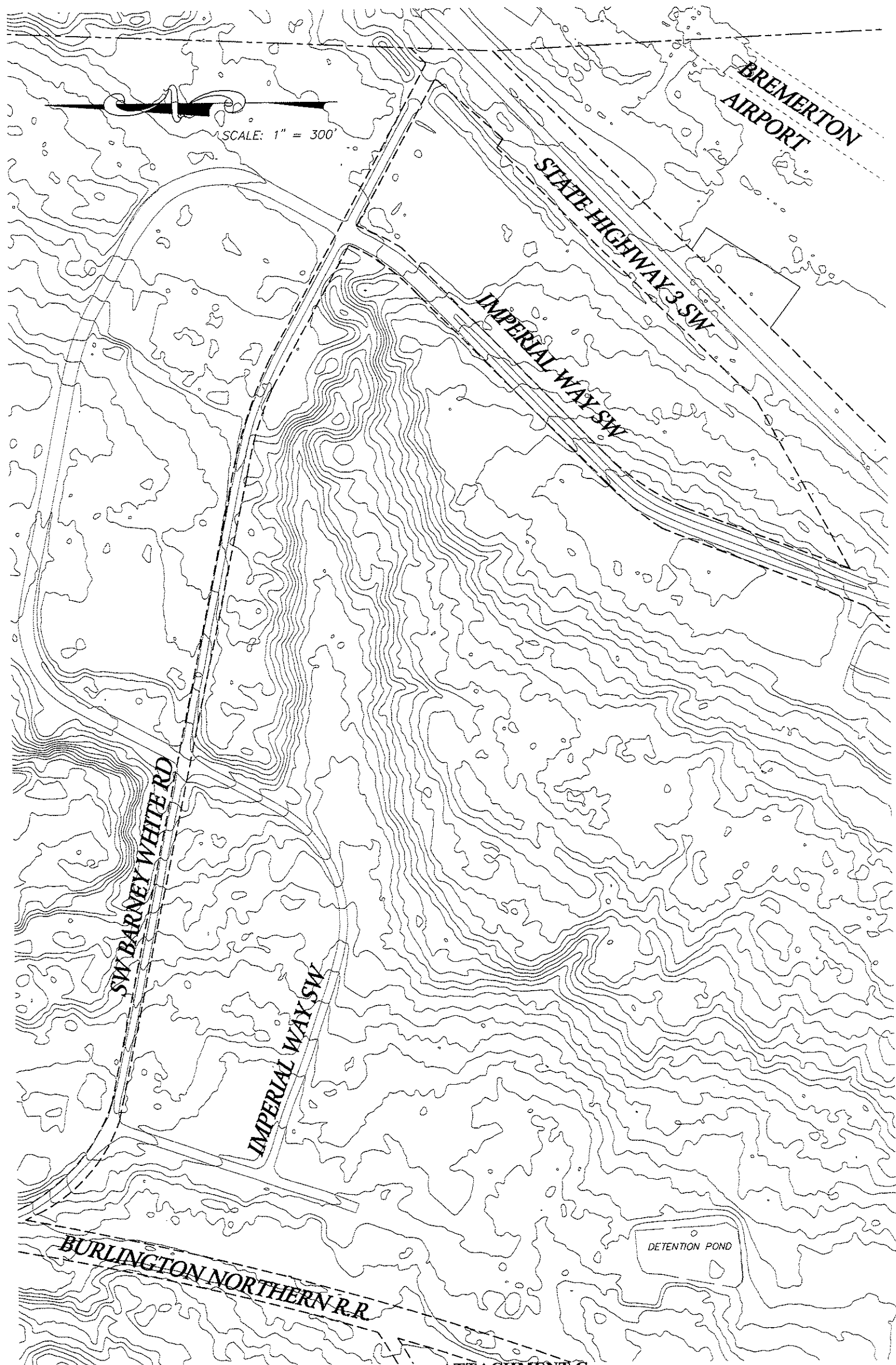


ATTACHMENT A



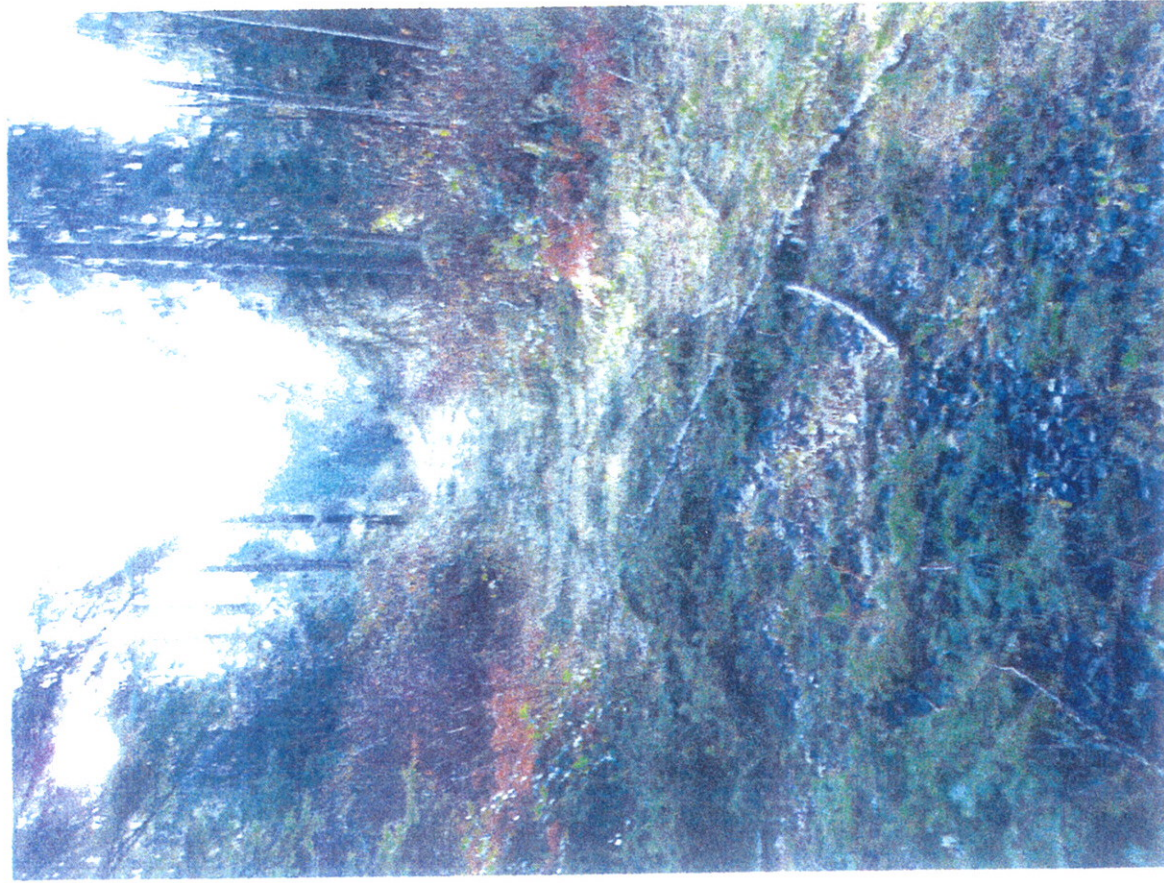
NO SCALE







LOGGING ROAD LOOKING NORTH



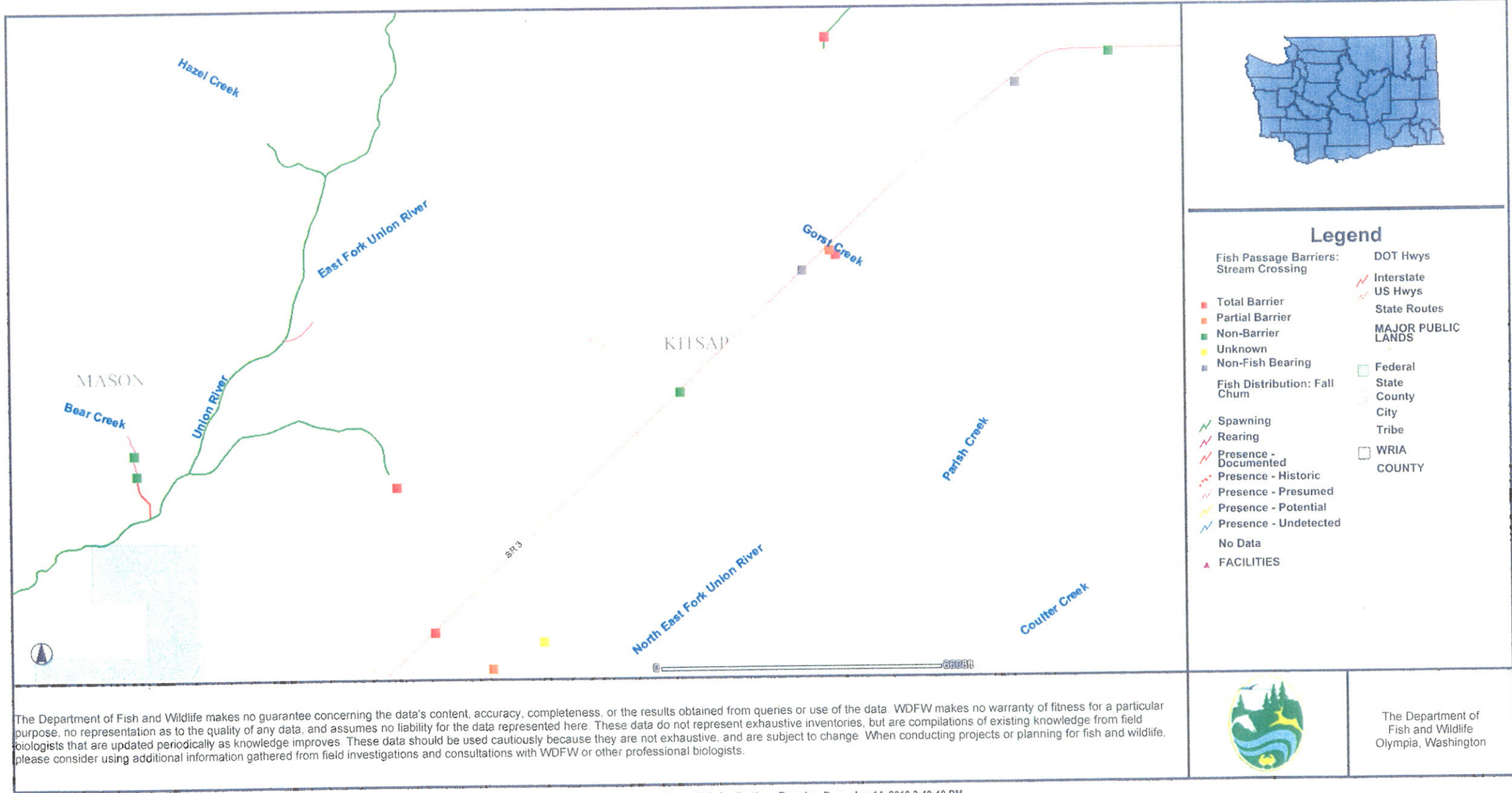
LOGGING ROAD LOOKING SOUTH



**CONSTANCE DR. CULVERT CROSSING**



**AREA WEST OF CONSTANCE DRIVE**



ATTACHMENT E

## Response to DEIS Letter 4: Bremerton Motorsports Park

1. **North East Fork Union River.** Comment acknowledged. The mapped stream investigated by Mr. Daley is LLID 1227839474982 as shown in Area B on Figure 3-1.6 of the DEIS. The extent of streams presented in the EIS are based on data developed by the County, which, in part are based on Washington Department of Natural Resources (DNR) Forest Practices modeled and field verified stream type data. The stream in question is identified on current DNR Forest Practices stream mapping. The EIS does not establish a regulatory requirement for the stream in question.
2. **Existing Bremerton Motorsports Park Facilities.** Please see Response to Letter 1, Comment 39.
3. **Existing Bremerton Motorsports Park Facilities.** Please see Response to Letter 1, Comment 39 and Comment 43. In addition paragraph 3 on page 3.3-19 will be revised to read:

~~The majority of new Industrial~~ development within the Olympic View Industrial Park (Area B) is expected to continue in a similar pattern as the current park, with primarily one story buildings, landscaping, surface parking and other features common in a business park setting. In addition, Bremerton Motorsports Park is currently in negotiations with the Port of Bremerton regarding a new multi-purpose motorsports facility that may be constructed on approximately 250 acres of Port property in Area B as further discussed on page 3.3-21. This facility would potentially include significant surface parking, outdoor racing facilities, spectator grandstands and amenities, landscaping and other components. The proposed BMP would establish a different land use pattern in this portion of the project area than currently exists. *(paragraph break inserted)*

The pattern of future development in Area A is less certain, but could be expected to include one or two story aircraft related businesses, transportation, shipping and other airport compatible development. Development would likely take a business park form south of the airport and perhaps aircraft related hangers and buildings east of the airport.

4. **Bremerton Motorsports Park Compatibility.** Please see response to Letter 1, Comment 43.

5. **Employment.** The referenced table provided employment estimates based on standard multipliers, rather than business-specific uses.
6. **Bremerton Motorsports Traffic Analysis.** The comment is noted.
7. **Existing Bremerton Motorsports Facilities.** The Subarea Plan comment is noted. The Subarea Plan is focused primarily on goals and strategies for the future and does not include a history of land uses in the area. The goals and strategies in the Draft Subarea Plan would not preclude the Bremerton Motorsports Park.
8. **Waterway.** Comment acknowledged. The mapped stream investigated by Mr. Daley is LLID 1227839474982 as shown in Area B on Figure 3-1.6 of the DEIS. The fish passage barriers referenced are located in Area A, and not located along the stream in question. WDFW SalmonScape does not identify any fish passage barriers along LLID 1227839474982.
9. **Greenhouse Gases.** The Subarea Plan comment is noted.
10. **LID Stormwater.** The Subarea Plan comment is noted.
11. **Use Designation.** The Subarea Plan comment is noted. The draft regulations do not preclude the Bremerton Motorsports Park. Please Appendix A in the Draft Subarea Plan.
12. **Sunset Clause.** The Subarea Plan comment is noted. The Subarea Plan is a long-range plan with a twenty-year time horizon. The City will monitor and review the Subarea Plan at regular intervals, as established by the Growth Management Act.

# McCULLOUGH HILL LEARY, PS

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July 21, 2011

City of Bremerton  
Community Development Department  
Attn: Andrea Spencer, Director  
345 6<sup>th</sup> Street, Suite 600  
Bremerton, WA 98337

RE: Comments on South Kitsap Industrial Area Draft Planned Action Environmental Impact Statement

Dear Ms. Spencer:

We represent Overton & Associates (“Overton”). As you know, Overton owns considerable acreage inside the South Kitsap Industrial Area (“SKIA”) and has been an active participant in the SKIA Technical Working Group. Overton’s primary goal is to ensure that the SKIA Subarea Plan and Planned Action Draft Environmental Impact Statement (“DEIS”) create an incentive for economic and infrastructure development in the SKIA area, the largest contiguous block of undeveloped industrial property in Kitsap County.

The DEIS discussed three alternatives: Alternative 1 (No Action), Alternative 2, which would provide for increased industrial development within the Manufacturing Industrial Center (“MIC”) and a change to the southern MIC boundary to allow for a mixed-use destination center; and Alternative 3, which assumes the highest level of industrial development and employment in the MIC, with no change to the boundary. Overton supports a “modified Alternative 2,” as described in more detail below.

Overton believes adoption of a subarea plan and implementing regulations, including a Planned Action EIS, is of great benefit. A Planned Action EIS allows for streamlined review of projects, which should create an incentive for new development to locate in the SKIA area. For that reason, Overton does not support Alternative 1.

However, the subarea plan and Planned Action EIS should reflect a realistic view of growth opportunities in the area and recognize the historic growth pattern in the SKIA area and the current economy. Based on those considerations, Alternative 3, the “Intensive MIC” option, is unrealistic. It anticipates 5,600,000 sq. ft. of new development and 10,000 jobs in the planning horizon. At this point, it makes no sense to create capital facilities plans for infrastructure required to support development of that magnitude. More realistic development projections represented under Alternative 2 would provide a sufficient basis for the City to accommodate development over the next 20 years, and in the unlikely event the demand exceeds the projections, the City could update its subarea plan and Planned Action with more accurate information about the type of uses and development that the SKIA area is attracting. Alternative 2 also projects more development than can be expected over the planning period. Overton believes that SKIA could realistically attract

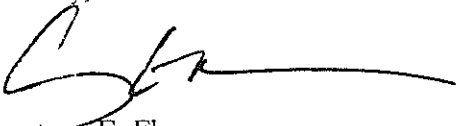
2,000 new jobs over the planning period, and it supports a modified Alternative 2 that is consistent with that number.

In addition, the MIC boundary should be revised to exclude the approximately 270 to 280 acres in the southwest portion of the study area, south of Lake Flora Road. It is appropriate for this area to be developed with office and retail uses, as envisioned in the DEIS. Overton also requests that residential uses be permitted in this area. This would be consistent with the GHG reduction strategy of providing housing options near SKIA that do not conflict with airport operations and encouraging the development of support retail and service uses within SKIA.

Finally, the DEIS discusses several greenhouse gas ("GHG") reduction strategies, among them: adopting green building standards for all new development; adopting low impact development ("LID") standards for stormwater treatment, requiring that a portion of the electricity demand be met through construction of renewable power generation or purchase of renewable energy, and adopting mandatory commute trip reduction programs. These mechanisms are all laudable, but if they are all mandatory, they could render development in the SKIA area so expensive that they could thwart the goal of stimulating the local and regional economy. The implementing regulations need to strike a balance between meaningful GHG reduction strategies and feasible options. One method is to create incentives for this LID standards (*i.e.*, a reduction in traffic impact fees in exchange for an ongoing commute trip reduction program), so that the same GHG reduction goals can be achieved, but individual developers and property owners have a choice about which strategies to implement for a particular project.

Thank you for your consideration of these comments. We appreciate your efforts on this, and we look forward to continuing to work with you on the SKIA planning process.

Sincerely,



Courtney E. Flora

cc: Melinda Posner, MPC  
Deborah Munkberg, EA/Blumen

### Response to DEIS Letter 5: McCollough Hill Leary, PS

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1. **Support Modified Alternative 2.** The comment is noted.
2. **Does not Support Alternative 1.** The comment is noted.
3. **Alternative 3 not Realistic.** The comment is noted. Please see the description of the Preferred Alternative in the Final EIS, which is the same as Draft EIS Alternative 2, except that the geographic area of the MIC has been reduced.
4. **Mixed Use Area South of Lake Flora Road.** The comment is noted. Please see the description of the Preferred Alternative in the Final EIS, which excludes the area south of Lake Flora Road from the MIC and designates it for mixed use office/retail development.
5. **Residential Uses.** The comment is noted. Residential uses are not included in the designated mixed use area. Because of the proximity to the airport and the future industrial area, the City does not consider this location to be appropriate for residential development.
6. **Greenhouse Gas Reduction Strategies.** The comment is noted. To the extent possible, greenhouse gas reduction measures proposed in the Draft Subarea Plan have focused on measures that are generally known to be cost effective in the short or long-term. The use of incentives has also been considered and incorporated as appropriate.

**Andrea Spencer**

**From:** Bolotin, Leah [BolotiL@wsdot.wa.gov]  
**Sent:** Thursday, July 21, 2011 11:31 PM  
**To:** Andrea Spencer; Chris Breiland  
**Cc:** Kovich, George; Klockenteger, Katherine; COM GMU Review Team; rpiro@psrc.org; Jeff Storrar  
**Subject:** WSDOT Comments on Planned Action DEIS for the South Kitsap Industrial Area

Dear Andrea,

Thank you for the opportunity to review and discuss the South Kitsap Industrial Area (SKIA) Planned Action Draft Environmental Impact Statement (DEIS). I appreciate the time you spent on the phone and the assistance of your sub-consultant in unraveling some of the technical and policy issues. We will be submitting comments on the SKIA Sub-Area Plan in a separate letter.

The Washington State Department of Transportation (WSDOT) found the DEIS to be well written, extensive in its analysis, and forward-thinking in its approach to a green and pedestrian-oriented industrial development. As discussed, there are a few points which could be delineated in more detail, require further clarification, or represent policy issues that warrant future discussion between the city of Bremerton and WSDOT.

Major concerns are discussed below and fall into the following categories:

- SEPA process
- Alignment of mitigation measures with other plans
- Level of service thresholds
- Some of the operational analyses
- Restrictions on SKIA development related to its co-location with the Bremerton National Airport.

Minor comments are compiled by EIS section and presented in the attached table.

### **SEPA Process**

The main concern of WSDOT regarding the SKIA development is that regional traffic flow be maintained on all state facilities, particularly SR 3. Besides providing primary transportation access to the SKIA area, SR 3 is also a regional corridor which supports the entire Kitsap and Mason County regions. Reliance on a planned action EIS process may not be enough to address and mitigate traffic impacts as development occurs. WSDOT can only pursue "reasonable and proportionate" mitigation through SEPA for new traffic added by each individual development. WSDOT preference would be a phased SEPA review in order to avoid a situation where the first developments go in with no improvements, and subsequent developments then become responsible for significant traffic improvement mitigation. A phased SEPA review could allow Bremerton to develop various funding mechanisms for intersection mitigation such as transportation benefit districts, improvement districts, impact fees, or other mechanisms as Bremerton sees fit.

My understanding after our discussions is that a capital facilities plan will be developed after a preferred alternative is selected, and that this CFP will spread costs and mitigation over phases. The CFP will be submitted to Commerce for a standard 60-day review. If this will enable Bremerton to fund the intersection improvements that will be necessary to mitigate traffic impacts from this development, then that will help to allay WSDOT concern with the planned action EIS approach.

### **Mitigation Measures and Alignment with Other Plans**

The summary in Chapter 1 states that WSDOT mitigation recommendations presented in the draft *Bremerton Economic Development Study* (BEDS) for Alternatives 2 and 3 were not sufficient to reduce impacts to a "less-than-significant level." Different mitigation measures are therefore presented in the

DEIS. The summary then states that “since WSDOT has not considered or planned for these alternative improvements, they are considered infeasible.” As discussed, the City and WSDOT will need to partner in the future to develop a comprehensive agreed-upon corridor plan for SR 3 which resolves discrepancies between the finalized SKIA EIS and BEDS recommendations.

Traffic operations mitigation measures discussed in Chapter 3.6 go into more detail outlining possible projects and actions to address some of the expected transportation impacts. Per [WAC 365-196-735](#), a jurisdiction's plans and planning policies are required to be consistent with both regional and state plans. WSDOT understands that it takes time to bring all levels of planning into alignment. To assist Bremerton in this effort I am attaching a table of projects in the Bremerton area which have been identified in regional and state plans. The goal would be for mitigation measures proposed for the SKIA preferred alternative, regional and state programmed improvements, and BEDS recommendations to eventually align. This helps to secure funding and ensure that a coordinated regional approach to transportation planning unfolds.

### Level of Service Thresholds

Chapter 3.6 also states “the City of Bremerton’s Comprehensive Plan defines the City’s level of service standards as D for all locations in the study area.” WSDOT is required per [RCW 47.06.140](#) to set level of service (LOS) for highways of state significance (HSS). The entire route of SR 3 has been designated an HSS. The state [2007 – 2026 Highway System Plan](#) (HSP) identifies LOS standards for HSS facilities in Appendix G. For HSS facilities, including ramp intersections, the LOS is D for urban areas and C for rural.

SR 3 is classified as a rural roadway from the vicinity of Sunnyslope Road south to the county line. It is a logical conclusion to assume that a state route classification would change from rural to urban after annexation. Based on [Federal Urban Area Boundaries](#), however, this segment is currently classified as rural. The federal classification may be modified based on the 2010 census at some point in the near future. Until that point, WSDOT will use the rural threshold of LOS C for this portion of SR 3 to assess traffic impacts, even if that traffic is located within Bremerton’s annexed area. WSDOT therefore requests that supplemental analysis be performed to identify any additional impacts or mitigation triggered by the higher LOS.

Appendix G of the HSP is attached for your reference.

### Operational Analysis

The Transportation Impact Analysis Results in Chapter 3.6 state that Alternatives 2 and 3 would trigger a deficiency threshold prior to 2030 for mainline SR 3. WSDOT expects that a similar finding would be made for Alternative 1 (No Action) if a roadway segment or arterial analysis, rather than just intersection analyses, were performed on SR 3 between Belfair and Bremerton. Preferred methodology for operational analysis of different types of state highway facilities is available in the WSDOT [Design Manual](#).

### Co-Location with the BNA

The SKIA consists of approximately 3,400 gross acres around Bremerton National Airport, and it comprises the largest undeveloped industrial property in Kitsap County. Bremerton National Airport is a public use airport with over 200 based aircraft and over 50,000 operations a year. [RCW 36.70.547](#) of Washington’s Growth Management Act requires towns, cities, and counties to discourage development of incompatible land uses adjacent to public use airports through adoption of comprehensive plan policies and development regulations.

WSDOT Aviation supports land uses and strategies within SKIA which have the potential for siting complementary and compatible uses adjacent to the Bremerton International Airport. Those land uses and strategies are:

- Prioritizing the development of underutilized portions of the Bremerton National Airport.
- The use of transfer of development rights to promote economic opportunities and compatible land uses.
- Industrial and commercial development compatible with aviation facilities.
- Construction of stormwater facilities within the airport influence using best management practices found in the WSDOT [Airport Stormwater Guidance Manual](#).

WSDOT does not support the following possible actions and uses within SKIA:

- Wetland enhancements. Wetlands adjacent to the airport have the potential for attracting wildlife hazards. Wildlife conflicts near airports should be reduced to increase safety for people in the air and on the ground.

- Child care facilities within the airport influence area.
- Residential uses and schools. These types of development are considered to be incompatible with airports due to the impacts of noise, light, vibration, fumes, and low flying aircraft.
- Large scale retail in areas with high accident potential.

For your information, WSDOT Aviation and the Federal Aviation Administration are currently conducting an economic impact study of Washington airports. The study will measure economic impacts of each public-use airport in Washington and the economic value it creates for the community and the state economy. The study will also be looking at how to successfully market land and attract complementary businesses around airports. Keep your eye on the [Aviation Economic Impact Study website](#) where findings will be posted.

WSDOT Aviation Division extends its continued support to the City of Bremerton for adopting comprehensive plan policies and development regulations that discourage the encroachment of incompatible land uses adjacent to public use aviation facilities. Please contact Carter Timmerman at 360-651-6312 or [carter.timmerman@wsdot.wa.gov](mailto:carter.timmerman@wsdot.wa.gov) with any aviation-specific questions or concerns.

Lastly, as work begins to progress on some of these development plans, please coordinate planning of roundabouts, signalization, and other improvements to state facilities with the WSDOT Olympic Region Development Services office. The contact is Dale Severson who may be reached at 360-357-2736 or [dale.severson@wsdot.wa.gov](mailto:dale.severson@wsdot.wa.gov).

Again, thank you for the opportunity to submit comments and please feel free to contact me with any further questions.

Sincerely,

**Leah Bolotin, AICP**

*Senior Planner*

*Urban Planning Office*

*Washington State Department of Transportation*

*401 - 2nd Avenue S., #300*

*Seattle, WA 98104-3850*

*p. 206-464-1264*

*f. 206-464-1286*

[leah.bolotin@wsdot.wa.gov](mailto:leah.bolotin@wsdot.wa.gov)

Attachments: (to be sent in follow-up email)

- Table of Comments on SKIA Planned Action DEIS
- Appendix G, State Highway System Plan, 2007 – 2026
- Second IMO GHG Study, 2009
- Seattle Community Greenhouse Gas Inventory, 2008 (author is [City of Seattle](#))
- NCFRP Report #4, Representing Freight in Air Quality and Greenhouse Gas Models, 2010
- WSDOT Design Manual, Chapter 540: Managed Access Control

## WSDOT Comments Table

### 2011 Planned Action DEIS for SKIA in Bremerton

#### Chapter 1, Summary

##### 1.3 Summary of Potential Impacts

Pages 1-5 thru 1-9, Summary of Impacts Table 1-2: WSDOT wishes to acknowledge that Bremerton received a Climate Showcase Communities Grant from the EPA to do both the DEIS and Sub-Area Plan for SKIA. Noting that there are no specific requirements under SEPA, and that this DEIS and the SKIA planning process include a strong emphasis on climate change, the analysis is nevertheless lacking a climate change vulnerability risk assessment on facilities in general, and particularly on transportation infrastructure. Potential impacts from sea-level rise on transportation infrastructure in the Bremerton, Tacoma, and Seattle areas could affect roads, ferry terminals, ports, and aviation.

To help address this item, please reference the discussion of vulnerability risk assessment available in the regional transportation plan, [Transportation 2040](#).

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##### 1.4 Mitigation Measures

Page 1-22, Alternative 3: This section states that operations at Imperial Way and Sunnyslope Road could be improved to an acceptable level by additional widening or grade separation. Please include the analysis done for this intersection in the Technical Appendices.

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Page 1-23, Traffic Safety Mitigation Measures: "As described in the previous section, the development of Alternatives 2 and 3 lead to additional traffic passing through the Collision Analysis Location (CAL) identified by WSDOT at SR 3 near Lake Flora Road." Please add the following information to the FEIS: WSDOT has programmed a safety improvement project on SR 3/Lake Flora Road to address an identified CAL. The project will construct a northbound right turn lane to Lake Flora Road, lengthen the center refuge lane into a center acceleration lane, and widen SR 3 in the vicinity of the intersection to provide a wider receiving lane for the acceleration lane. The project will also install centerline rumble strips. The design is still under development and may eventually include shoulder rumble strips as well. Construction is expected in the 2013/2014 timeframe.

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#### Chapter 3.2, Climate Change and Greenhouse Gas Emissions

##### 3.2.1 Affected Environment

Pages 3.2-2 thru 3.2-8. Methodologies: WSDOT commends the City for the detailed emissions analysis of building materials and processes, post-development and building lifespan energy usage, aircraft, and commute to work on-road vehicle emissions. However, the DEIS does not analyze marine transportation emissions. The *South Kitsap Industrial Area Market Feasibility Analysis* referenced in the DEIS identifies the Ports of Bremerton and Tacoma, Puget Sound Naval Shipyard, and Washington State Ferries as all

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providing regional access and a competitive economic advantage. These facilities merit consideration of marine transportation emissions analysis. The same argument may also be made for emissions analysis of the Puget Sound-Pacific Railroad.

As discussed, methodology for these types of analyses are still under development. I am attaching some documents outlining preliminary guidance and approach considerations for marine and rail greenhouse gas analysis, along with a [TRB publication](#) link for *Marine Transportation and Port Operations, 2010*. These documents are for your information; WSDOT is not requesting that additional analyses be performed at this time.

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cont.

## Chapter 3.6, Transportation

### 3.6.1 Affected Environment

Page 3.6-4, Policy Context: "Within the study area, SR 3 is defined as a limited access highway, except for the portion south of Lake Flora Road, which is defined as a managed access highway. Therefore, future driveway connections with SR 3 within the SKIA site will be limited to right-in/right-out movements, subject to approval by WSDOT. However future roadway connections with full access intersections, like the Cross SKIA Connector road, which is currently under construction, may be allowed by WSDOT." Please note that SR 3 is classified as a Partially Limited Access Highway from Lake Flora Road to Riverside Road (milepost 28.98-34.09). Per [WAC 468-58-010](#), commercial development would not be allowed to have direct access to or from SR 3. Commercial access would instead need to be via frontage or other public roads. Please include a summary of the access control issues in the regulatory section of the FEIS. I am attaching a chapter of the WSDOT [Design Manual](#) which discusses access control classification if you wish to include it in the Technical Appendices instead of providing a summary. More information is available on the WSDOT [access management webpage](#).

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### 3.6.2 Future Conditions Land Use and Transportation Scenarios

Page 3.6-11, Planned Roadway Transportation Improvements: "In August 2010, WSDOT released the Bremerton Economic Development Study (BEDS) which recommends numerous improvements to the road network along SR 3 and 16 in the SKIA area." Please change the title of the study to Draft Bremerton Economic Development Study; the study is still being reviewed by WSDOT.

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Page 3.6-12, Planned Roadway Transportation Improvements: "Given the uncertainties related to future transportation finance, none of the BEDS projects were assumed to be in place under 2030 condition." Typo: Condition should be changed to conditions.

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### 3.6.8 Transportation Impact Analysis Results

Page 3.6-31, Traffic Safety: "Development under Alternatives 2 and 3 will lead to additional traffic traveling through the Collision Analysis Location (CAL) defined by WSDOT at SR 3 near the Lake Flora Road intersection. While WSDOT has plans to reconfigure this intersection as part of the Belfair Bypass, this roadway project is not funded and is not assumed to be in place under 2030 conditions. Therefore

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the additional traffic added to this CAL under Alternatives 2 and 3 is considered a significant impact to traffic safety.” Please see related comments for Chapter 1, page 1-23.

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cont.

### 3.6.9 Mitigation Measures

Page 3.6-31, Proposed Plan Features: “Mitigation measures to address significant traffic operations impacts of Alternatives 2 and 3 are generally based on the recommended improvements described in the WSDOT BEDS report. In some cases the WSDOT improvement recommendations were not sufficient to reduce the impact to a less-than-significant level. In these cases, an alternative improvement is recommended; however, since WSDOT has not considered or planned for these alternative improvements, they are considered infeasible.” Please see related comments for Chapter 1, page 1-20.

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#### Page 3.6-32, Alternative 2, #1: SR 3 / Old Clifton Road:

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“The poor operations at this intersection are caused by the high traffic volumes on northbound and southbound SR 3.” Please change the text to note that turning volumes at the intersection and nearby business traffic also contribute directly to the level of operation at this intersection.

“The Belfair Bypass is identified in the BEDS report as one of the highest priority projects in the SR 3 corridor.” Please add underlined corrections.

“This bypass would reduce the amount of through traffic on ‘old SR 3’ through the Belfair community, but would not reduce local trips or trips to/from the North Shore area on SR 300.” Please add that the Bypass is also not expected to reduce trips through Belfair which are traveling to/from SR 106.

“Based on an origin destination analysis described in the Belfair Bypass Proviso Report (WSDOT 2010) the bypass will likely not lead to a sufficient amount of diversion to result in LOS D or better operations at this intersection, although the congestion levels will improve when compared to the option without the bypass.” Please add that a Newkirk Road connection on the west side of SR 3, north of Clifton, has the potential to reduce traffic volumes at the intersection of SR 3 and Old Clifton Road.

“However additional lanes are inconsistent with the current Belfair Area Widening and Safety Improvements project (currently funded for construction in 2012) to add a two-way left turn lane on SR 3 south of this intersection, and may be infeasible due to right-of-way impacts and the configuration of the railroad undercrossing located north of Belfair.” For your information, Phase 1 of this project includes widening for a two-way left turn lane and sidewalks from Sweetwater Creek to north of Romance Hill Road (milepost 25.36-26.13), and then sidewalks up to Ultimate (mp 26.13-27.08). From milepost 26.34-27.08, the existing SR 3 right of way is 100 feet wide. This width might be adequate for a second through-lane in each direction in the area of the intersection with Old Clifton Road. The existing railroad crossing on the north side of Belfair is not wide enough for four lanes on SR 3 however. Additional through lanes may or may not be included in Phase 2. Please note that Phase 2 (from SR 106 to Sweetwater Creek, milepost 24.91-25.36) remains unfunded and the design year is still unknown.

**3.6.9 Mitigation Measures (cont.)**

Page 3.6-34, Alternative 3, #1: SR 3 / Old Clifton Road: Please see comments directly above.

Pages 3.6-31 thru 3-6.37, Traffic Operations Mitigation Measures: This section outlines possible projects and actions which could help to mitigate expected transportation impacts from SKIA development. Per [WAC 365-196-735](#), a jurisdiction's plans and planning policies are required to be consistent with both regional and state plans. To assist Bremerton in this effort, a list of projects is being provided. These are projects in the Bremerton area which are identified in current regional and state transportation plans: the state [Highway System Plan](#) (HSP) and the Regional Transportation Plan (RTP), [Transportation 2040](#).

**The HSP** lists mobility recommendations that are categorized into three tiers, as follows:

- Tier I: System Operation. These projects consist of lower cost projects, shorter delivery schedules, and system-wide implementation applications. Examples include intelligent transportation systems (ITS), access management projects, ramp modifications, turn lanes and intersection improvements.
- Tier II: System Efficiency. These projects build upon Tier I improvements and promote optimization of traffic operation systems. They include operational improvements such as ramp metering, turn lanes, adjusting the timing of signals, adding auxiliary lanes, improving a parallel corridor, or ITS.
- Tier III: System Expansion. These projects build upon the previous two tiers and tend to be higher cost projects with corridor-wide benefits. They may include adding general purpose or high occupancy vehicle or toll (HOV or HOT) lanes, passenger rail, transit, multi-modal facilities, or major interchange improvements.

Tier I projects are typically smaller and involve limited construction activities. The quick implementation and lower cost increase their likelihood of being funded. Tier III projects are categorized as such primarily due to their anticipated higher cost, degree of construction difficulty, and time required to design and build. These projects require state or federal highway funding because their expense is above what local jurisdictions and agencies can afford. The legislature is the funding authority for all Tier III projects. The HSP was last updated in 2007 and is currently being revised.

**RTP projects** are categorized as either constrained or unconstrained. Constrained projects are part of planned transportation improvements and were coordinated with a specific anticipated funding level. They therefore have a higher potential to be funded by the legislature than unconstrained projects, which do not have a specific funding strategy.

The following excerpt of projects is provided for your convenience; please consult the source documents for complete accuracy and more detail. Dates, when given, are the estimated year of completion.

**SR 3**

- Widening to four lanes from Lake Flora Road to Imperial Way (2040, unconstrained Tier III)
- Widening to four lanes from Imperial Way to Sunnyslope Road (2040, constrained Tier III)
- Widening to four lanes from Sunnyslope Road to SR 16 eastbound (2040, constrained Tier III)

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21  
cont.

- Widening to four lanes plus two HOV lanes, SR 16 to SR 304 (2040, constrained Tier III)
- Widening to four lanes plus two HOV lanes, SR 304 to Loxie Eagans Blvd (2040, constrained Tiers II & III)
- Install ITS along segment from SR 16 spur to SR 104 (Tier I)
- SR 16 interchange improvements (2020-2040, constrained Tier III)
- SR 304 interchange improvements (2020-2040, constrained Tiers II & III)
- Intersection improvements at Imperial Way (Tier II)
- Intersection improvements at Sunnyslope Road (Tier II)
- Intersection improvements at Sam Christopherson Ave W (2020, constrained Tier II)

**SR 16**

- Widen to add HOV lanes from SR 160 to SR 166/Gorst (2040, unconstrained Tier III)
- Convert two general purpose lanes to HOV from SR 166 to SR 3 (2040, unconstrained Tier I)
- SR 160 Interchange improvements (Tier III)
- Tremont Street interchange improvements (Tier III)
- Gorst area improvements (Tier III): Widen to add HOV lanes, grade separate Sam Christopherson Road/SR 3 intersection, and widen SR 3 and SR 16 ramps to accommodate future traffic flows

**SR 303**

- Widen to add business access and transit (BAT) lanes, 11<sup>th</sup> St to Fairgrounds Road (2040, constrained Tier III)
- Install ITS and improve intersections along segment from SR 304 to Brownsville Highway/Clear Creek Road (Tier I)
- Access management and intersection improvements at Riddle Road (Tier II)

In addition to the above projects listed in the HSP and RTP, the following projects are funded, and several are currently under construction:

- SR 3: Lake Flora Road to south of Imperial Way - Safety Improvements. Install right turn lane, lengthen center lane, and widen intersection. The project will install a northbound "off-set" right turn lane (separated from the through-lane by more than just a stripe) to Lake Flora Road, construct a center acceleration lane, widen SR 3 in the vicinity of the intersection, and install centerline rumble strips. The design is still under development and may possibly include rumble strips on the shoulders as well. Anticipated construction complete: 2014.
- SR 3: Belfair Bypass - New Alignment. Construct new alignment around the town of Belfair, connecting to Lake Flora Road on the north end. Existing funding will complete the environmental process, identify all right of way required, and complete design including contract plans; it does not include construction. Anticipated environmental analysis complete: 2025.
- SR 3: Belfair Area - Widening and Safety Improvements. Phase 1 of this project includes widening for a two-way left turn lane and sidewalks from Sweetwater Creek to north of Romance Hill Road

(milepost 25.36-26.13), and then sidewalks only up to Ultimate (mp 26.13-27.08). Other improvements may include pedestrian and bicycle facilities, storm sewer improvements, and other mitigation requirements. Based on current cost estimates and available funding, this project will be staged. Stage 1 is fully funded; Stage 2, from SR 106 to Sweetwater Creek (milepost 24.91-25.36) is not funded. Anticipated construction complete for Stage 1: 2014.

- SR 3: Sam Christopherson Ave W to SR 304 - Paving. Anticipated construction complete: 2012.
- SR 303: Manette Bridge Bremerton Vicinity - Replace bridge with new structure. Anticipated construction complete: 2012.
- SR 303: Port Washington Narrows Bridge - Upgrade Bridge Rail. Anticipated construction complete: 2011.
- SR 304: Various ferry terminal improvements, including wingwall replacement, seismic retrofits, and security infrastructure. Ongoing through 2017.

21  
cont.

# *Appendix G: Development Impacts Assessment*

The State Environmental Policy Act (SEPA) requires local jurisdictions to assess and mitigate, when reasonable and proportionate, the impacts of new development projects, including impacts to traffic. Together, local jurisdictions and WSDOT agree on an acceptable level of service (LOS). A particular development could cause traffic impacts to a highway segment or an intersection to fall below the LOS<sup>1</sup> thresholds. The LOS thresholds are defined as:

For Highways of Statewide Significance (HSS) including the ramp intersections, the LOS is set by WSDOT (RCW 47.06.140)<sup>2</sup>:

- Urban Areas: LOS “D”
- Rural Areas: LOS “C”

For Regionally Significant State Highways (non-HSS):

- The LOS thresholds adopted by the local MPO/RTPO shall apply. In the absence of an adopted LOS threshold, the LOS for HSS shall apply. Where there is a specific inter-local agreement with WSDOT, the applicable LOS threshold levels are established by the agreement.

When a development affects a segment or intersection where the LOS is already below the applicable threshold, the pre-development LOS will be used instead of the otherwise applicable deficiency level.

When a development would degrade the facility’s LOS below the applicable threshold, the facility would be considered deficient to support the development, and WSDOT and its partners would seek reasonable and proportionate mitigation of traffic impacts.

Mitigation can take the form of development constraints (for example, the appropriate placement of highway access points or phasing the development), development constructed transportation improvements, financial contribution or right of way dedication. Details on these and other mitigation strategies are contained in the WSDOT *Development Services Manual* and the *Design Manual*.

---

<sup>1</sup> For specific information about LOS, see Appendix A: Glossary

<sup>2</sup> For counties consisting of islands whose only connection to the mainland are state highways or ferry routes (Island County), the level of service standards for state highways and ferry route capacity must be a factor in meeting the concurrency requirements. In Island County, the LOS has been set at Urban Areas: LOS “E” and Rural Areas: LOS “D”. This is a GMA based requirement not a SEPA requirement per RCW 36.70A.070(6)(a)(iii)(C).

## Second IMO GHG Study, 2009

(Link to external document – International Maritime Organization)

<http://www.imo.org/ourwork/environment/pollutionprevention/airpollution/documents/ghgstudyfinal.pdf>

## City of Seattle Community Greenhouse Gas Inventory, 2008

(Link to external document – City of Seattle)

<http://www.seattle.gov/environment/documents/2008-community-inventory-fullreport.pdf>

## NCFRP Report #4, Representing Freight in Air Quality and Greenhouse Gas Models, 2010

(Link to external document – Transportation Research Board)

[http://www.trb.org/Publications/Blurbs/Representing\\_Freight\\_in\\_Air\\_Quality\\_and\\_Greenhouse\\_163965.aspx](http://www.trb.org/Publications/Blurbs/Representing_Freight_in_Air_Quality_and_Greenhouse_163965.aspx)

## WSDOT Design Manual, Chapter 540: Managed Access Control

(Link to external document – Washington State Dept. of Transportation)

<http://www.wsdot.wa.gov/publications/manuals/fulltext/M22-01/540.pdf>

## Response to DEIS Letter 6: Washington State Department of Transportation

1. **Phased SEPA Review.** The comment is noted. Although phased review is not proposed, the planned action ordinance may include checkpoints or thresholds based on dates, trips or other appropriate measures. When a threshold is met, the City will review circulation and transportation impacts to ensure that appropriate mitigation is being provided and levels of service are as projected. If needed, the planned action ordinance could be amended at that time to reflect changed conditions. As part of this threshold review, the City would consult with WSDOT. The City is committed to working in collaboration with WSDOT to ensure that mobility on state facilities is maintained.

In addition, although adoption of the planned action ordinance would remove the opportunity to comment on project-specific proposals through SEPA, opportunity for comment is still provided on all project-specific applications. BMC 20.02 describes the City's project permit process, including provisions for public notice of application (BMC 20.02.100). BMC 20.02.100 requires notification to state, federal and local agencies with jurisdiction and establishes that comment periods will not be less than 14 days or greater than 30 days.

2. **Capital Facilities Plan.** The comment is noted. Please see the draft capital facilities plan in the Draft Subarea Plan.
3. **WSDOT Collaboration.** Comment has been noted, it is understood that the City of Bremerton will consult with WSDOT once the SKIA plan is formalized to review mitigation strategies.

The project list table attached to the comment (included in Appendix 2) was helpful in identifying a timeline for mitigation strategies.

- The northbound right turn lane from SR 3 to Lake Flora Road, scheduled for completion in 2014, was identified as a mitigation, along with an additional through lane on SR 3, for Alternative 3
- The Belfair Bypass, scheduled for design and analysis completion in 2025, was identified as mitigation for Alternative 3 and will reduce the impact at SR 3 / Old Clifton Road under Alternative 2. However, as noted, there are currently no funds allocated to construction.

4. **Level of Service Standard.** The comment clarifying LOS standards for SR 3 within the study area was noted. The result of this change is that Intersection 1, SR 3 / Old Clifton Road; Intersection 2, SR 3 / Lake Flora Road; and Intersection 3, SR 3 / Imperial Way will all be assessed using LOS C standards.

The following table, which is based on the traffic data provided in the report, provides the delay and LOS at these intersections under existing and future scenarios.

| DELAY AND LEVEL OF SERVICE, INTERSECTIONS 1-3, BY SCENARIO |              |                       |                              |                              |
|------------------------------------------------------------|--------------|-----------------------|------------------------------|------------------------------|
| Intersection                                               | Existing LOS | 2030 No Action<br>LOS | 2030<br>Alternative 2<br>LOS | 2030<br>Alternative 3<br>LOS |
| 1. SR 3 / Old Clifton Road                                 | 23 / C       | 37 / D                | 111 / F                      | 122 / F                      |
| 2. SR 3 / Lake Flora Road                                  | 21 / C       | 60 / F                | >150 / F                     | >150 / F                     |
| 3. SR 3 / Imperial Way                                     | 11 / B       | 49 / D                | >150 / F                     | >150 / F                     |

**Source: Fehr & Peers, 2011**

Under 2030 No Action conditions, all three intersections are expected to operate at levels exceeding the LOS C standard. The two "Action" alternatives would exacerbate this condition. The following table provides information by future scenario on mitigation options that will allow each intersection location to function at LOS C. As noted by the WSDOT comment, it is likely that the federal classification for these locations may be modified based on the 2010 Census. Such revision would reduce the mitigation necessary to return these facilities to acceptable (LOS D instead of LOS C) operating conditions.

| INTERSECTION MITIGATION TO REACH LOS C |                                  |                                                                                                                    |                                                                                                                                                                                                                                                                                                        |
|----------------------------------------|----------------------------------|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Intersection                           | 2030 No Action                   | 2030 Alternative 2                                                                                                 | 2030 Alternative 3                                                                                                                                                                                                                                                                                     |
| 1. SR 3 / Old Clifton Road             | Belfair Bypass Construction      | Belfair Bypass and addition of northbound and southbound through lanes on SR 3                                     | Belfair Bypass and addition of northbound and southbound through lanes on SR 3                                                                                                                                                                                                                         |
| 2. SR 3 / Lake Flora Road              | Signalization                    | Signalization, additional northbound and southbound through lanes on SR 3, new northbound right turn lane on SR 3. | Signalization, additional northbound and southbound through lanes on SR 3, new northbound right turning lane on SR 3, revise approach on Lake Flora Road to include a dedicated left turn lane, dedicated right turn lane, and shared left/right turning lane (one additional lane on Lake Flora Road) |
| 3. SR 3 / Imperial Way                 | Widen SR 3 to four through lanes | Widen SR 3 to four through lanes                                                                                   | Widen SR 3 to six lanes or grade separated interchange                                                                                                                                                                                                                                                 |

**Source: Fehr & Peers, 2011**

5. **Segment Analysis.** As shown in the response to Item 4, study intersections 1-3 on SR 3 are expected to operate at unacceptable conditions under the 2030 Alternative 1 / No Action scenario, as they are above the LOS C threshold. A segment analysis conducted for Alternative 1 / No Action volumes indicates that the roadway will be below the deficiency threshold south of Sunnyslope Road. Therefore, the findings based on the intersection and segment LOS techniques are the same.
6. **Bremerton National Airport.** In order to discourage development of incompatible land uses adjacent to Bremerton National Airport,

the SKIA Subarea Plan puts forth several goals and strategies (see Goal LU 2, and Strategy LU 2.3 within the SKIA Subarea Plan).

The development standards for SKIA would include SKIA specific zones. The City's official Zoning Map would reference the Subarea Plan. The Aviation Business zone would promote aviation related business and manufacturing. As described in Section C of the revised draft Subarea Plan, permitted uses within these SKIA-specific zones account for land use compatibility with the airport.

7. **Uses not Supported.** Wetland enhancements would be regulated by the Bremerton Critical Areas Ordinance. The City would coordinate with the Port on potential impacts to nearby wetlands and appropriate mitigation measures that would reduce the potential for attracting wildlife hazards.

Please see in Section C, Chapter 3, of the SKIA Subarea Plan regarding specific uses.

See the response to Comment 24 of Letter 1 regarding large scale retail uses in areas with high accident potential.

8. **Aviation Economic Impact Study.** The comment is noted. The Aviation Economic Impact Study was not published prior to the publication of this FEIS.
9. **Airport Compatibility.** The comment is noted. The City of Bremerton will continue to collaborate with the WSDOT Aviation Division on changes to policy or development regulations that could impact the Bremerton National Airport.
10. **Climate Change Vulnerability.** WSDOT correctly points out that there are potential threats to the state highway system related to climate change, particularly in the Gorst area. The risk assessment in the Puget Sound Regional Council's Transportation 2040 regional transportation plan identifies these risks, which should be considered as part of the SKIA environmental review process.
11. **Intersection Analysis.** The results of this intersection analysis are contained as Appendix D of the DEIS and repeated in Appendix 2 of this FEIS.
12. **Traffic Safety.** Per WSDOT request, the following information should be reflected related to the discussion of the Collision Analysis Location (CAL) on page 1-23:

"WSDOT has programmed a safety improvement project on SR 3/Lake Flora Road to address an identified CAL. The project will construct a northbound right turn lane to Lake Flora Road, lengthen the center refuge lane into a center acceleration lane, and widen SR 3 in the vicinity of the intersection to provide a wider receiving lane for the acceleration lane. The project will also install centerline rumble strips. The design is still under development and may eventually include shoulder rumble strips as well.

Construction is expected in the 2013/2014 timeframe."

13. **Marine Transportation Emissions.** The comment regarding the potential emissions related to SKIA from marine or rail transportation has been noted. As WSDOT notes, methodology for these types of analyses are still under development. Additionally FHWA, in reporting recent GHG emissions from domestic freight transportation notes that data fluctuations in marine transport reflect data collection problems in monitoring this sector.  
  
Furthermore, actual emissions from these sectors will reflect the mix of businesses that occupy SKIA after development.
14. **SR 3 Access Control.** The analysis assumed all access to SR 3 from SKIA developments would be made via public roads, both existing and new. This is consistent with WSDOT guidelines. The WSDOT chapter of the Design Manual addressing access control on state facilities is included as Appendix 2 of this FEIS.
15. **Draft BEDS.** It is noted that all references to the Bremerton Economic Development Study (BEDS) should be a reference to the Draft Bremerton Economic Development Study (BEDS).
16. **Typographical Error.** The typo has been noted. The text on page 3.6-12 should read "Given the uncertainties related to future transportation finance, none of the BEDS projects were assumed to be in place under 2030 conditions."
17. **Traffic Safety.** Per WSDOT request, the following information should be reflected related to the discussion of the Collision Analysis Location (CAL) on page 3.6-31:

"WSDOT has programmed a safety improvement project on SR 3/Lake Flora Road to address an identified CAL. The project will construct a northbound right turn lane to Lake Flora Road, lengthen the center refuge lane into a center acceleration lane, and widen SR

3 in the vicinity of the intersection to provide a wider receiving lane for the acceleration lane. The project will also install centerline rumble strips. The design is still under development and may eventually include shoulder rumble strips as well.

Construction is expected in the 2013/2014 timeframe."

18. **WSDOT Collaboration.** A response to this comment was included as a response to comment 3 of this letter regarding mitigation strategies.

19. **SR 3/Old Clifton Road.** The following text on page 3.6-32:

"1. SR 3 / Old Clifton Road – The poor operations at this intersection are caused by the high traffic volumes on northbound and southbound SR 3. The Belfair Bypass is identified in the BEDS report as the highest priority project in the SR 3 corridor. This bypass would reduce the amount of through traffic on "old SR 3" through the Belfair community, but would not reduce local trips or trips to/from the North Shore area on SR 300. Based on an origin destination analysis described in the Belfair Bypass Proviso Report (WSDOT 2010) the bypass will likely not lead to a sufficient amount of diversion to result in LOS D or better operations at this intersection, although the congestion levels will improve when compared to the option without the bypass. Outside of the diverted trips, the only intersection configuration that improves this intersection to LOS D or better is the addition of northbound and southbound through lanes on "Old SR 3."

However additional lanes are inconsistent with the current Belfair Area Widening and Safety Improvements project (currently funded for construction in 2012) to add a two-way left turn lane on SR 3 south of this intersection, and may be infeasible due to right-of-way impacts and the configuration of the railroad undercrossing located north of Belfair. This impact is considered significant and unavoidable."

is revised to state:

"1. SR 3 / Old Clifton Road – The poor operations at this intersection are due to the volume of traffic on SR 3, SR 300, and local business traffic. The Belfair Bypass is identified in the BEDS report as one of the highest priority projects in the SR 3 corridor. This bypass would reduce the amount of through traffic on "old SR 3" through the Belfair community, but would not reduce local trips or trips to/from

the North Shore area on SR 300 or trips through Belfair which are traveling to/from SR 106. Based on an origin destination analysis described in the Belfair Bypass Proviso Report (WSDOT 2010) the bypass will likely not lead to a sufficient amount of diversion to result in LOS D or better operations at this intersection, although the congestion levels will improve when compared to the option without the bypass. Outside of the diverted trips, the only intersection configuration that improves this intersection to LOS D or better is the addition of northbound and southbound through lanes on "Old SR 3."

However additional lanes are potentially inconsistent with the current Belfair Area Widening and Safety Improvements project (currently funded for construction in 2012) to add a two-way left turn lane on SR 3 south of this intersection, and is likely infeasible due to right-of-way impacts and the configuration of the railroad undercrossing located north of Belfair. This impact is considered significant and unavoidable."

20. **SR 3/Old Clifton Road.** Please see response to Comment 19 of this letter.
21. **Mitigation Projects.** The mitigation strategies in the existing report focused around options from the Draft BEDS report. The supplemental list of improvements provided by WSDOT, included as Appendix 2 of this FEIS, can provide further information on mitigation strategies that the City of Bremerton and WSDOT can collaboratively develop.



Environmental Program  
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360/394-8450  
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**THE SUQUAMISH TRIBE**  
P.O. Box 498 Suquamish, Washington 98392

Andrea Spencer  
City of Bremerton, Planning Department  
345 6<sup>th</sup> Street, Ste. 600  
Bremerton, WA 98337

Re: South Kitsap Industrial Area Draft Planned Action Environmental Impact Statement and  
Appendices  
Draft South Kitsap Industrial Area Sub-Area Plan

Dear Ms. Spencer,

The Suquamish Tribe appreciates the opportunity to provide comments on the South Kitsap Industrial Area Draft Planned Action EIS and Draft Sub-Area Plan. The proposed project is within the usual and accustomed fishing areas of the Suquamish Tribe. The Tribe seeks protection of all treaty-reserved natural resources and cultural resources. The Tribes primary concerns regarding the proposed sub-area plan are treaty resources, critical areas, habitat, and water quality and quantity.

Typically, decisions affecting critical areas are made on a project-by-project, permit-by-permit basis. This often precludes the effective consideration of the cumulative effects of critical area loss and degradation. It also hampers the ability of State, Tribal, regional, and local governments to integrate critical area conservation objectives into the planning, management, and regulatory tools they use to make decisions regarding development and other natural resource issues. This often results in inconsistent and inefficient efforts among agencies at all levels of government. The Tribe appreciates the City of Bremerton's ("City") efforts to address impacts at a watershed level and involve affected Tribes in the dialogue.

**The Draft Documents Do Not Support Exempting Further Environmental Review of "Planned Actions"**

The Tribe understands that the City has elected to follow an integrated SEPA/GMA process for the SKIA Draft Planned Action EIS and the SKIA Subarea Plan. Although the Tribe has attended nearly all meetings associated with this EIS, the review of these documents is the first time the the Tribe has become aware of the City's approach to using a planned action ordinance to streamline environmental review of planned projects within the SKIA subarea plan.

This integrated planning process under GMA/SEPA forgoes further environmental review of proposals constituting "planned actions" so long as certain requirements are met. RCW 43.21C.031 (2); WAC 197-11-164. A planned action means one or more types of project action that are designated by ordinance and have has the significant impacts adequately addressed in an EIS prepared in conjunction with a subarea plan. According to pg 2-6 of the Draft EIS, "Planned projects should only be designated when a city can reasonably analyze the area-specific impacts

that would occur as a result of the types of projects designated.” As explained below, there is insufficient information to analyze the environmental impacts associated with area-specific impacts of the planned actions. In addition, a generalized analysis of cumulative environmental impacts will not provide enough information to address a project’s impacts when it is time for the jurisdiction to issue permits for specific projects proposed as planned action projects. It is not clearly identified which areas have been identified as “planned actions:”

1 cont.

The SEPA Handbook provides additional guidance related to planned actions:

The designation of planned action projects will only be appropriate in limited situations. The designation of planned action projects is probably most appropriate for:

- Smaller geographic areas;
- Relatively homogenous geographic areas where future development types, site-specific conditions, and impacts can be more easily forecast;
- Development sites with significant overlapping regulatory requirements; or
- Routine types of development with few impacts.

Relating to the criteria listed above the Tribe does not believe that 3,590 acres is considered a smaller geographic area nor is that land relatively homogenous in nature. There are areas within the identified geographic area that are prone to flooding and many areas that are wrought with wetlands and streams. Important headwater wetlands should not be placed under a streamlined or programmatic permitting process. These impacts cannot be easily identified from the information provided and these areas have the potential to incur significant impacts from development.

Ongoing and pending development in the watershed, particularly in the headwaters, poses significant risk to the ability to maintain the natural hydrographic regime in the watershed. Numerous studies have demonstrated that development within a watershed is related to degradation of aquatic habitat and impacts salmonid populations. Studies have shown that salmon and trout habitat is significantly degraded once basin-wide impervious surfaces reach a level of about 10%. These disturbances result in changes in the biological, chemical and physical properties of wetlands and streams. Aquatic resources may then be exposed to higher levels of noise, light, temperature, pollutant loading, stormwater runoff, invasive species establishment and human activity.

Advance planning involves the preliminary identification, mapping, and assessment of critical areas within the planning area. Advance planning may also identify critical areas that merit a higher level of protection and guide conservation into land use planning at the local level. Advance planning provides greater predictability and certainty to property owners, developers, project planners, and local governments/agencies/Tribes.

However, planning on a watershed level does not exempt the City from conducting a thorough project specific review as “the devil is in the details.” The City has a certain degree of responsibility to the Tribe as well as the public to ensure that there is an opportunity to weigh in on potential impacts to natural resources. The EIS is addressing impacts that are speculative and SEPA addresses those that are more specific. At this time the ultimate use of the property and associated impacts are unknown. It is also not the purpose of the EIS to satisfy the various

Federal and State environmental requirements that would have to be complied with by developers or purchasers of the properties prior to their being able to implement their proposals.

1 cont.

The mitigation measures identified in the Draft EIS are inadequate to mitigate for the environmental impacts arising from the planned actions because they are very general. Title 20 of the Bremerton code is based on detailed site specific evaluations to achieve no net loss of wetland functions and values. The EIS does not provide enough detail to ensure that the goal of no net loss of wetland functions and values is actually met. With the lack of detailed site specific information it is impossible to make a determination as to whether an impact and the associated mitigation is scientifically sound and supported. The general mitigation measures that have been outlined but the City cannot ensure that impacts will be reduced to a “non-significant” level. The code discussing wetland mitigation is very subjective and does not lay out mitigation replacement ratios so in remaining flexible for the developer they have removed certainty for the regulatory agencies and affected Tribes. In addition, there is a lack of discussion regarding measureable mitigation performance standards, monitoring, maintenance and contingency actions.

The public SEPA process is then the only opportunities for the agencies and Tribes to provide input and ensure that regulations are met and resource protection provided. Further, mitigation for potential impacts should involve cooperative discussion between the lead SEPA agency, the Tribes, WDFW, USACOE and the DOE.

The Draft EIS states on pg. 2-7, “Following the completion of the EIS process, the City will designate the Planned Action by ordinance (see Appendix A for the draft Planned Action Ordinance). The ordinance will identify mitigation, as described in this EIS, which could include requirements that would apply to all development in the study area as well as measures that may apply on a case-by-case basis.”

The requirements for the planned action ordinance under WAC 197-11-168 require, in part, a description how the planned action meets the criteria in WAC 197-11-164 (including specific reference to the EIS that addresses any significant environmental impacts of the planned action); a finding that the environmental impacts of the planned action have been identified and adequately addressed in the EIS subject to project review under WAC 197-11-172; and identifying any specific mitigation measures other than applicable development regulations that must be applied to a project for it to qualify as the planned action.

The draft planned action ordinance is still in a rough draft format and does not fully address the regulatory requirements of the ordinance. Although we recognize that the City intends to adopt this ordinance after the EIS process and after engaging in a public process, the evaluation of the draft EIS and the ordinance are inextricably linked. For example, the Planned Action Qualifications contains the following “[Note: this list is a placeholder and will be revised, as appropriate, based on sub-area plan land uses]. Other criteria are “to be determined” or contain other placeholders. There is no Planned Action Area provided in Exhibit A; there is no Planned Action EIS Mitigation Measures provided in Exhibit B. Specific mitigation measures other than applicable development regulations that must be applied to a project for it to qualify as the planned action are not provided. In sum, given the premature nature of the draft planned action ordinance and the lack of specificity, it impossible to evaluate (in addition to the comments provided above) whether the environmental impacts and mitigation measures of the planned actions have been adequately addressed in this draft EIS and that the ordinance will meet the

regulatory requirements, in addition to being consistent with the EIS. Therefore, the Tribe opposes the use of the Planned Action Ordinance. | 1 cont.

### **EIS Specific Comments**

Cultural Resources - The information listed on pages 1-18, 1-19, 3.4-7 and in Appendix G of the EIS are general statements and do not represent adequate mitigation measures that would result in no significant unavoidable impacts to cultural resources in the proposed development area. The general background research and regional summaries of archaeology and ethnography conducted for cultural resources sections in the EIS are not adequate to delineate probabilities for various types of cultural resources that may occur within the SKIA Area of Potential Effects (APE). This is especially problematic when considering the City's proposed approach to designate developments within the subarea as "planned actions" which foregoes future environmental review that includes notice to the Tribe. The Suquamish Tribe is the primary Tribe with an interest in the project area, which is within the Tribe's Ancestral Territory. The City of Bremerton should conduct Government-to-Government consultation with the Suquamish Tribe regarding cultural resources. The Suquamish Tribe Archaeology and Historic Preservation Program staff should review all site specific proposed development details within the APE to determine the likelihood for affecting significant Tribal cultural resources. | 2

3.1-23 – Please note that even if wetland delineations have been completed if they are more than a few years old they need to be redone to be accurate. | 3

3.3-18 – Please explain: "allocation of growth to specific subareas of SKIA". Does this mean employment growth? | 4

Appendix A - Table A.2-1 and A.2-2 (listed streams and wetlands). Please make a notation on these tables that these are not a complete field verified list of streams and wetlands that are present. Wild Fish Conservancy is doing stream inventories in North Kitsap and finding 50-60% error in the DNR mapped information. In addition, the National Wetland Inventory maps are also just a starting point. These wetlands are mapped using aerial photo interpretation and are not accurate in areas with heavy vegetative cover. All streams and wetlands need to be identified/verified with WDFW and Tribal concurrence. | 5

### **Sub-Area Plan General Comments**

1. Areas adjacent to the Union River, Coulter Creek, Gorst Creek, and in the vicinity of headwater wetlands should be specifically zoned to provide protection. | 6

2. Monitoring hydrology to analyze potential impacts of development on aquifer recharge areas and any subsequent impacts to streamflow in adjacent streams needs to be included. | 7

3. Water quality monitoring plans or other actions specifically implemented to specifically address the Sinclair Inlet TMDL Plan to provide elimination/limitation of potential impacts to waters already on the Ecology 303 (d) list need to be included. Areas where point and non-point pollution sources are currently causing water quality/beneficial use impairment need to be identified. The position of most local jurisdictions seems to be that as long as new development follows the latest stormwater treatment guidance and complies with the minimum requirements of | 8

NPDES Phase I and II, that water quality is protected. Unfortunately stormwater treatment technologies and BMPs are not designed for and are seldom effective at treating FC bacteria pollution. Source control remains the most effective way to control FC pollution.

**Sub-Area Plan Specific Comments**

1. Revise NE 1.7 and NE 1.8 to include inventory of wetlands and streams. | 9
2. Revise Goal LU-1 to include complete mitigation sequencing: avoid, minimize and then mitigate if impacts are unavoidable. | 10

In summary, the draft EIS does not clearly identify the planned action areas nor does it fully address environmental and cultural resource impacts and provide adequate mitigation measures for the planned actions. The current documents fail to address the protection of Tribal Treaty resources. The Suquamish Tribe welcomes the opportunity to work with the City of Bremerton to develop a plan that satisfies your goals as well as protects Tribal resources. Thank you for the opportunity to review and comment on this proposal. If you have questions regarding these comments please feel free to contact me at 360-394-8447.

Sincerely,



Alison O'Sullivan  
Biologist, Environmental Program

Cc: Gina Piazza, Department of Fish and Wildlife  
Randy Lumper, Skokomish Indian Tribe  
Patrick McGrainer, Washington Department of Ecology

## Response to DEIS Letter 7: Suquamish Tribe

1. **Planned Actions.** The concerns regarding the planned action process and analysis are noted. The comment addresses several concerns, which are addressed below.

**Awareness of planned action approach.** Information about the planned action approach was included as part of the Determination of Significance, at the public scoping meeting, at the Draft EIS public meeting and has been posted to the City's website for this project. For more information, please see [www.sustainableskia.com](http://www.sustainableskia.com).

**Planned action analysis.** The analysis in the Draft EIS is consistent with the scope of review established for this project and appropriate for a Subarea Plan. The state SEPA rules specifically identify subarea plans as appropriate for planned actions (WAC 197-11-164(b)(1)). It is acknowledged that the analysis provides an area-wide review of the elements of the environment. This level of analysis is appropriate for review of a subarea plan. No specific projects are proposed at this time, and site-specific analysis is neither possible nor required.

**Mitigation.** The analysis in the Draft EIS considers a range of potential industrial uses that could occur over a 20-year time horizon. Because the specific nature and timing of development at any particular site is not known, site specific mitigation requirements would be speculative and inappropriate in a subarea-wide analysis. Instead, the mitigation measures establish the applicable regulations and requirements, proposed plan features and other measures needed to ensure that impacts are adequately mitigated. Such measures would become conditions of approval of any subsequent projects.

As noted in the comment, SEPA review for the Subarea Plan does not and is not intended to satisfy local, state and federal regulatory requirements for specific projects. For each element of the environment, the mitigating measures discussion includes a description of applicable regulations and requirements that will help mitigate impacts for individual projects. For example, the City of Bremerton critical areas ordinance will continue to apply to all sites with critical areas. As noted in the comment, City of the Bremerton critical areas ordinance establishes a goal of no net loss for wetlands (BMC 20.14.310).

**Size of planned action area.** As described in Draft EIS Section 2.1, the proposal is to designate the South Kitsap Industrial Area, as

shown in Figure 2-1, as a planned action. Except to establish that the planned action area shall be less than the jurisdictional boundaries, SEPA does not limit the size of a planned action area (WAC 197-11-164). In general, some of the larger planned action areas designated in Washington have tended to be for industrial development because such uses typically require aggregation of large areas for development. For example, one of the earliest planned actions adopted in the state is the Southwest Everett planned action, which consists of approximately 4,000 acres of industrial area in the City of Everett. The City of Tukwila has also designated a planned action for an industrial area larger than 1,000 acres in area.

**Opportunity for Comment.** The planned action would not eliminate anyone's ability to comment on individual projects. As noted in the comment, adoption of the planned action ordinance would only limit the opportunity to comment on project-specific proposals through the SEPA process. However, notice and an opportunity for public comment is still provided on all project-specific applications. BMC 20.02 describes the City's project permit process, including provisions for public notice of application (BMC 20.02.100). BMC 20.02.100 requires notification to state, federal and local agencies with jurisdiction and establishes that comment periods will not be less than 14 days or greater than 30 days. Through this process, interested stakeholders continue to have the opportunity to provide input on project proposals.

**Planned Action Ordinance.** The draft ordinance that was included as an appendix to the Draft EIS was intended to provide early information on the overall structure of the planned action process. Because the specific requirements of the planned action ordinance are defined through the EIS process, it is not possible to include a finalized ordinance in the Draft EIS and is not required through SEPA. As noted above, the planned action area is described in Draft EIS Section 2.1. Mitigating measures for each element of the environment are described in Draft EIS Chapter 3 and summarized in Chapter 1. As the comment notes, there will be additional opportunity for comment on the planned action ordinance prior to any City action. It should be noted that the planned action ordinance is primarily procedural, and mitigation measures will come from the Final EIS and adopted federal, state and local regulations.

2. **Mitigation Measures.** Please see the response to Comment 1, above, specifically related to mitigation and opportunity for

comment. Land use actions in areas that have not have not had an archaeological investigation including field testing that could have an effect on cultural resources should be reviewed by DAHP and the affected Tribes. Suquamish is one of those Tribes.

3. **Wetlands.** The first paragraph under "Wetlands" on page 3.1-23 is revised to include the following as the second to last statement of the paragraph:

"US Army Corps of Engineers jurisdictional determination (JD) of wetland boundaries is typically valid for five years; reassessment of delineated boundaries is required for delineations older than five years."

4. **Employment Growth.** Yes, the referenced sentence refers to employment growth. The relevant paragraph on Page 3.3-18 has been revised to read:

#### **Employment and Population**

Under all alternatives, employment would increase and residential development would not be permitted in SKIA. Population increase in SKIA would therefore be negligible under all alternatives. The alternatives differ in the amount of employment expected, percentage of increase in SKIA compared to overall employment growth in Bremerton, allocation of employment growth to specific subareas of SKIA and in the mix of employment uses.

5. **Stream and Wetland Inventory.** Notation on Table A.2-1 has been revised to include notation (5) Waterways are subject to field verification; and additional undocumented waterways may be onsite or adjacent to the project area, subject to field verification. Notation on Table A.2-2 has been revised to include notation (4) Wetlands are subject to field verification; and additional undocumented wetlands may be onsite or adjacent to the project area, subject to field verification.
6. **Critical Areas Protection.** Comment acknowledged. Existing critical areas buffers apply to the waterways and headwater wetlands referenced in the comment, which are applicable to SKIA.
7. **Hydrology.** There are no currently accepted standards for monitoring groundwater recharge, and baseline conditions have not been determined. Many years of data would be required to establish baseline conditions for comparison with developed conditions, and those baseline conditions fluctuate based on

regional weather patterns and cycles. The City's Critical Areas Ordinance (CAO) incorporates Best Management Practices specifically designed to protect and maintain recharge cycles while effectively managing stormwater runoff. In addition, the most stringent development restrictions will apply to analysis areas that contain Category I critical aquifer recharge areas (CARAs) as included in the existing CAO. In these areas, most allowed uses (except those specifically allowed or prohibited by the CAO) will require a hydrogeologic assessment to verify that groundwater will be protected. Development restrictions for operational areas with Category II CARAs are specified in the CAO, and depending on the extent of the Category II area and nature of the proposed development these areas may also warrant a detailed hydrogeologic evaluation to verify that groundwater resources will be protected.

Strategy NE2.1 has been revised to state:

Incorporate Low Impact Development (LID) stormwater features as a means to manage stormwater and optimize the local hydrologic cycle. Examples of LID stormwater measures include underground injection control, bioretention cells, bioswales, porous pavement, green roofs, rainwater harvesting, stormwater dispersion, sustainable site planning and layout, and phytoremediation.

8. **Water Quality.** Comment acknowledged. We concur that source control BMPs are the effective means to control Fecal Coliform (FC) pollution in stormwater, and two development-related permits and a TMDL plan applicable to SKIA will promote this concept. For future industrial development within SKIA, the current NPDES Industrial Stormwater General Permit requires industrial facilities covered under the Permit to implement source control BMPs and potentially stormwater treatment BMPs in accordance with a site-specific Stormwater Pollution Prevention Plan (SWPPP) to control pollutant levels in facility runoff. The Permit also requires quarterly monitoring of stormwater runoff from these facilities. The second applicable permit is the City's Western Washington Phase II Municipal Stormwater Permit which, along with the Sinclair and Dyes Inlets TMDL, promotes the use of source control BMPs and other measures (e.g., Low Impact Development (LID)), some of which are being incorporated into the SKIA regulations, to protect the common waters.

There are no known sources within SKIA that are currently causing water quality/beneficial use impairment.

9. **Wetlands and Streams.** Strategy NE 1.7 and 1.8 have been deleted in the revised Draft Subarea Plan in recognition of limited funding; however, any future development would be required to conduct an analysis of impacted wetlands and streams at the time of development.
10. **Mitigation Sequencing.** The City's current Critical Areas Ordinance requires mitigation sequencing, which is consistent with Goal LU 1.

**From:** [Melinda Posner](#)  
**To:** [Deborah Munkberg](#)  
**Cc:** ["Andrea Spencer"](#); ["Alyce Fierro"](#); ["Tony Raeker"](#); [SKIA@ci.bremerton.wa.us](mailto:SKIA@ci.bremerton.wa.us)  
**Subject:** FW: SKIA Plan comments  
**Date:** Tuesday, July 12, 2011 10:09:21 AM

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**From:** Doug Skrobut [mailto:doug@mccormickwoods.com]  
**Sent:** Wednesday, June 15, 2011 10:19 AM  
**To:** melinda@mposnerconsulting.com  
**Subject:** SKIA Plan comments

Melinda;

Thanks for your time on Monday.

I have gone through my sticky notes and here is a summary of those notes:

- |                                                                                                                                                                                                                                                                                                                                       |    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| The plan could use a better overall site location graphic. I believe a graphic on the scale of the graphic used for the transportation map that includes the Belfair UGA and the City of Port Orchard boundaries and the County's UGA boundary and the Coulter Creek Heritage Park would give a sense of perspective of the location. | 1  |
| Page #5 – last paragraph: “new model” - this is too lofty of a vision for SKIA – we need to be doing what we know is accepted by the market and what will attract jobs.                                                                                                                                                               | 2  |
| Page #8 – 1 <sup>st</sup> bullet point: “minimize native plan impacts” – how is minimize defined?                                                                                                                                                                                                                                     | 3  |
| Page #9 – Land Use 2 <sup>nd</sup> bullet point : why discourage speculative land clearing? Who gets to decide what is speculative?                                                                                                                                                                                                   | 4  |
| Page #12 – Utilities – 2 <sup>nd</sup> bullet point. The goal of water reuse is an important one. In this situation, the focus should be on getting reclaimed water to the golf courses for irrigation, not installing expensive pipes to buildings where very little water is used.                                                  | 5  |
| Page # 12 – require LID for all new development – this is unworkable and not practical. In situations where LID can be used and is economical, the private sector will be motivated to use it – but can be required to use it.                                                                                                        | 6  |
| Page #12 – limit type of industrial activities on LID areas – since we are required to use LID (see above) this precludes certain activities, which could be a limiting factor.                                                                                                                                                       | 7  |
| Page # 13 – why are we not using the city's existing CAO??                                                                                                                                                                                                                                                                            | 8  |
| Page #20 – ED 3.2 – why are we telling business owners how to run their business???                                                                                                                                                                                                                                                   | 9  |
| Page #21 – language about minimizing impacts, restricting clearing, limiting impervious surfaces, preserving native landscaping are not consistent with industrial development                                                                                                                                                        | 10 |
| Page #22 – language such as “promote”, “discourage”, “encourage” etc. is threatening.                                                                                                                                                                                                                                                 | 11 |

|                                                                                                                                                                                                                                                                   |    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| Page #23 – the plan seems to anticipate land use restrictions above and beyond FAA 77 – why??<br>The plan should refer to FAA 77 and leave it at that.                                                                                                            | 12 |
| Page #24 – LU 2.7 – as currently zoned can't establish transition zones, because all the land in the county is zoned rural, and all the land in the City is zoned industrial. If portions of SKIA are rezoned, there would be an ability to establish transition. | 13 |
| Page #28 – T2.2 – what is the definition of “underutilized parking lots”? Due to their nature, Industrial areas have large parking areas \ laydown yards                                                                                                          | 14 |
| Page #48 – limits on clearing, surface coverage ratios, etc. are not consistent with urban industrial standards                                                                                                                                                   | 15 |
| Page #6 of Market Study – scenario #2 – forecasts SKIA to capture 17% of all jobs, not just industrial jobs – similar capture of non-industrial jobs on page 40 and page 44 of market study.                                                                      | 16 |

## Response to DEIS Letter 8: Doug Skrobut

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1. **Location Graphic.** The vicinity map in the Subarea Plan and the Transportation Section of the DEIS are identical, and includes the SKIA boundary, the City of Bremerton city limits, and the City of Port Orchard city limits.
2. **Vision Statement.** The Subarea Plan comment is noted. The vision statement is intended to set a reasonably ambitious long-term goal for SKIA. It is acknowledged that implementation will occur in incremental steps that will be focused on market feasibility.
3. **Native Plant Impacts.** Please see Subarea Plan Section C, Chapter 4.020 regarding site clearing, and Chapter 4.050, regarding vegetation preservation.
4. **Speculative Clearing.** Speculative land clearing means clearing and grading activities that are not associated with development activity. Such activity is typically discouraged because it can result in erosion, downstream sedimentation and an unsightly appearance.
5. **Water Reuse.** Where a public reclaimed water system is available, the draft regulations anticipate creating an incentive for the installation of dual plumbing. Please see Section D, Chapter 5.080, in the Draft Subarea Plan.
6. **LID Standards.** As currently drafted, the draft regulations encourage low impact development stormwater measures wherever feasible. Please see Section C, Chapter 4.090, in the Draft Subarea Plan.
7. **LID Standards.** Low Impact Development (LID) Best Management Practices (BMPs) provide stormwater treatment and flow control. At industrial facilities where it is possible that a spill could occur, a stormwater source control BMP may be required, as described in Volume IV of the Stormwater Management Manual for Western Washington. Additionally, certain LID practices (i.e. pervious pavement) may have limited application where spills or other contamination (i.e. dirt) could occur. However, many LID BMPs (i.e., amended soils, bioretention, etc.) do not have these limitations.
8. **Critical Areas Ordinance.** The goals and strategies are consistent with the City's Critical Areas Ordinance, which will continue to regulate critical areas in the study area.

9. **Economic Development Strategy.** This strategy is not intended to tell business owners how to run their business, only to suggest possible strategies to promote workforce training.
10. **Industrial Development Standards.** The Subarea Plan comments are noted. The landscaping standards are intended to support environmental stewardship, not to preclude industrial development.
11. **Policy Tone.** The Subarea Plan comment is noted. The language noted is intended to convey policy intent, not be threatening. Please see the draft regulations which implement the goals and strategies and provide more specific language.
12. **Airport Compatibility.** The Subarea Plan does not intend to restrict land uses beyond those required by FAA Part 77. Language has been clarified to reflect this intent.
13. **Transition Zones.** The referenced strategy is intended to address long-range coordination of land use patterns around the SKIA MIC. For example, note that the Preferred Alternative described in the Final EIS would designate the area south of Lake Flora Road as mixed use commercial. It is acknowledged that only a limited area adjacent to SKIA boundaries is currently urban.
14. **Parking.** The strategy is intended to encourage efficient use of parking areas. It is acknowledged that industrial uses sometimes require large areas for truck movement and materials. The strategy is not intended to preclude parking areas that would serve these needs.
15. **Urban Industrial Standards.** The Subarea Plan comment is noted. Proposed development standards are intended to allow urban industrial development and support goals of environmental stewardship. Please see Appendix A of the Subarea Plan for the specific requirements proposed in the draft regulations.
16. **Market Study.** The market study attached to the Draft Subarea Plan identifies three different scenarios for how SKIA might capture new industrial jobs. Each scenario makes different assumptions about how many new industrial other jobs would be captured in SKIA. The comment refers to different assumptions incorporated into the different scenarios. It is acknowledged that the assumptions differ between scenarios.

## SKIA Draft Plan & EIS Public Comments

Written comments on postcards collected at Public Meeting on June 16, 2011

|                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                            |
|-------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| <b>Letter 9</b>                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                            |
| Adam A. Victor<br>1107 Pacific Ave., Bremerton,<br>98337<br>adamavictor@yahoo.com                                             | I would be interested in furthering the ideas of green rooftops, especially if we could grow food. Imagine SKIA restaurants buying SKIA produce. Thanks, AAV                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 1                          |
| <b>Letter 10</b>                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                            |
| Roger Zabinski                                                                                                                | Marketing – simple overview of SKIA, with goals, etc. and stakeholder – Port, City, private property owners, KEDA, PSE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 1                          |
| Roger Zabinski                                                                                                                | Need to identify Park & Ride Lot and Transit Pickup area;<br><br>Need industrial park amenities – soccer field, trails, restaurants, public meeting areas                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 2<br>3                     |
| <b>Letter 11</b>                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                            |
| Tim Thomson<br>8850 SW SR 3, Bremerton, WA<br>98312<br><a href="mailto:Timt@PortofBremerton.org">Timt@PortofBremerton.org</a> | <ol style="list-style-type: none"> <li>1. Site map I believe is in error. The notch (Northwest) west of RR line is not in SKIA. It certainly is not Port property.</li> <li>2. I don't think the significance of the airport is apparent in the plan. Could be stronger and emphasized more. It is their jewel in the rough.</li> <li>3. Rail access land is quite limited and rail use requires USN cooperation.</li> <li>4. Port has signed a lease allowing a motorsports park on 247 acres at Port property inside Oly View Industrial Park. This needs to be addressed in the plan somehow.</li> <li>5. Traffic congestion is not addressed (EIS?). That's the reason the Navy has the wrong perception that SKIA is hard to get to.</li> <li>6. Sustainability – Green is good but I'm concerned about onerous land development and building construction requirements.</li> </ol> | 1<br>2<br>3<br>4<br>5<br>6 |
| <b>Letter 12</b>                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                            |
| No author noted                                                                                                               | Looks okay. Build Rt. 3 to 4 lanes; go for maximum growth                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 1                          |

## Response to DEIS Letter 9: Adam Victor

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1. **Green Rooftops.** The Subarea Plan comment is noted. Although green rooftops are not specifically identified as a sustainability measure, they are not precluded in the draft regulations. Restaurants are also permitted in SKIA.

### Response to DEIS Letter 10: Roger Zabinski

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1. **Economic Development.** The Subarea Plan comments are noted.
2. **HOV Facilities.** Given the general nature of the SKIA Subarea Plan, it is premature to identify specific details such as park and ride lot locations. As the project develops, park and ride lot locations may be identified at a later date depending on the mitigation options being implemented and the type of transit service being offered in the area. It is anticipated that the specific location for a park and ride will be identified in the future in collaboration with Kitsap Transit.
3. **Public Amenities.** The Subarea Plan comment is noted. The draft development regulations would promote open space and walking/bicycle paths, but do not currently anticipate active recreational uses. Restaurant uses are permitted.

## Response to DEIS Letter 11: Tim Thomson

1. **SKIA Boundary.** The referenced property is correctly shown as part of SKIA. The shading shown in Figure 6 was intended to indicate that the property is within a Port Industrial zone, but not that the property is owned by the Port of Bremerton.
2. **Bremerton National Airport.** The Subarea Plan comment is noted. Strategy ED 2.10 recognizing the importance of the Bremerton National Airport and supporting continued partnerships in future economic development outreach has been added to the Draft Subarea Plan.
3. **Railroad.** The comment is noted. The conditions mentioned by the commenter do not preclude the use of the railroad as a transportation option for the SKIA site.
4. **Bremerton Motorsports Park.** It is noted that the Bremerton Motorsports Park is a potential tenant in the area. The draft Subarea Plan goals and strategies would not preclude this development.
5. **Traffic Congestion.** Traffic congestion is addressed in the Draft EIS through intersection level of service analysis. Please see EIS Section 3.6 for a discussion of transportation impacts and mitigation associated with the proposal.

Potential future impacts to the intersection of SR 3 / SR 16 / Sam Christopherson Avenue in Gorst were analyzed under all development scenarios. The position or perception of the US Navy is not a component of the environmental impact assessment.

6. **Sustainability.** The Subarea Plan comment is noted. Long-term sustainability of the SKIA Subarea is a primary objective of the City in undertaking this project. As described in the EIS, key objectives of this project include the following:
  - Enhance sustainability and reduce greenhouse gas emissions
  - Incorporate low impact development standards
  - Provide environmental stewardship
  - Incorporate green and sustainable infrastructure
  - Provide regional leadership in sustainable economic development

In addition, the Climate Showcase Communities grant from the US Environmental Protection Agency that was awarded for this project

was specifically intended to develop policies and programs to support sustainability and reduce greenhouse gas emissions; integrate green/low impact development techniques; and support green economic development.

## Response to DEIS Letter 12: Anonymous

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1. **Maximum Growth.** Comment has been noted, the ultimate configuration of SR 3 will be determined through a subsequent planning and engineering effort to be led by WSDOT with participation from the City of Bremerton.

## Section 3 - Revisions to the Draft EIS

## 3. REVISIONS TO THE DRAFT EIS

This chapter of the Final EIS (FEIS) identifies revisions to the June 2011 Draft EIS (DEIS), including text changes and clarifications, based on comments received and other updated information. These changes are also reflected in the appropriate responses to comments in Chapter 2.

### 1.0 Summary

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#### Typographical Errors

On page 1-7, the spreadsheet references 'Sedgewick Road' under Alternative 3, Transportation. This reference hereby reads 'Sedgwick Road.'

On page 1-30 in the first paragraph, the first sentence is corrected to read as follows:

"There are no ~~not~~ significant unavoidable adverse impacts identified in any of the elements of the environment except transportation and utilities."

#### New Text

On page 1-23, the following information is hereby added related to the discussion of the Collision Analysis Location (CAL):

"WSDOT has programmed a safety improvement project on SR 3/Lake Flora Road to address an identified CAL. The project will construct a northbound right turn lane to Lake Flora Road, lengthen the center refuge lane into a center acceleration lane, and widen SR 3 in the vicinity of the intersection to provide a wider receiving lane for the acceleration lane. The project will also install centerline rumble strips. The design is still under development and may eventually include shoulder rumble strips as well."

Construction is expected in the 2013/2014 timeframe."

### 3.1 Earth

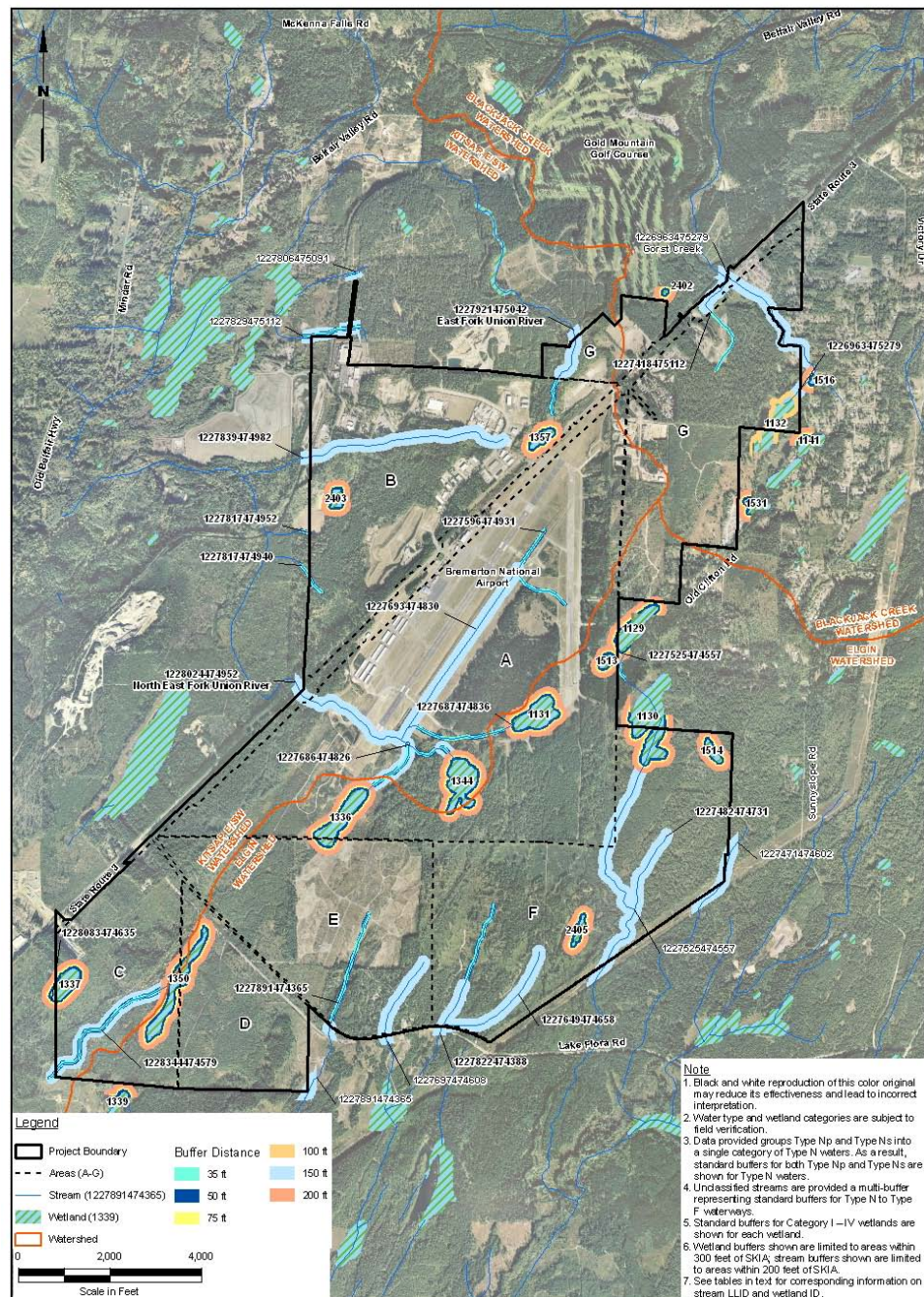
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#### New Information

Based on the DNR Water Type Modification Form (Reference No. SP15110212), Table A.2-1 of Appendix D hereby identifies LLID 1227418475112, Unnamed Tributary to Gorst Creek as Water Type F, Ns; with standard buffer of 150 feet, 35 feet. Figure 3.1-6 hereby identifies

LLID 1227418475112 with a 35 foot buffer from a point located adjacent to the north side of US 3 and extending south to the approximate property boundary between Alpine Evergreen Co. Inc. and McCormick Land Company, which is in the vicinity of the line between Sections 1 and 12 of Township 23N, Range 01E.

Figure 3.1-6: Wetland, Waterways, and Standard Buffers Map



Source: Landau Associates, 2011

### New Text

On page 3.1-23, the first paragraph under "Wetlands" is hereby revised to include the following sentence as the second to last statement of the paragraph:

"US Army Corps of Engineers jurisdictional determination (JD) of wetland boundaries is typically valid for five years; reassessment of delineated boundaries is required for delineations older than five years."

### New Table Notations

Notation on Table A.2-1 is hereby revised to include:

Notation (5) Waterways are subject to field verification; and additional undocumented waterways may be onsite or adjacent to the project area, subject to field verification.

Notation on Table A.2-2 is hereby revised to include:

Notation (4) Wetlands are subject to field verification; and additional undocumented wetlands may be onsite or adjacent to the project area, subject to field verification.

## 3.2 Climate Change and Greenhouse Gas Emissions

### New Text

The following footnote to Table 3.2-13 is hereby added:

Table 3.2-13: GHG Emissions Reductions\*

| GHG Reduction Strategy                                | Alternative 2 Reductions (MTCO <sub>2</sub> e) | Alternative 3 Reductions (MTCO <sub>2</sub> e) |
|-------------------------------------------------------|------------------------------------------------|------------------------------------------------|
| Green Building Standards                              | 912,695                                        | 1,597,986                                      |
| Renewable Electricity                                 | 305,570                                        | 535,006                                        |
| Energy Efficient Outdoor Lighting Standards           | 73,016                                         | 127,839                                        |
| Compact Development Standards (with forest retention) | 1,887,000                                      | 1,887,000                                      |

| GHG Reduction Strategy                       | Alternative 2 Reductions<br>(MTCO <sub>2</sub> e) | Alternative 3 Reductions<br>(MTCO <sub>2</sub> e) |
|----------------------------------------------|---------------------------------------------------|---------------------------------------------------|
| Mandatory Commute<br>Trip Reduction Program  | 78,078                                            | 168,355                                           |
| Expanded<br>Vanpool/Transit                  | 60,060                                            | 129,504                                           |
| Additional Housing<br>Near SKIA              | 249,849                                           | 299,297                                           |
| Support Retail and<br>Services               | 39,039                                            | 46,765                                            |
| Efficient Transportation<br>Design Standards | 3,000                                             | 3,000                                             |
| Encourage Locally<br>Serving Industries      | 19,519                                            | 23,383                                            |
| <b>Total (% reduction)</b>                   | <b>3,624,826<br/>(35%)</b>                        | <b>4,815,133<br/>(34%)</b>                        |

**Source: Fehr & Peers, 2011.**

\*The results in this table show the cumulative GHG emissions reduction benefit from enacting each strategy. If several strategies are implemented as part of a package, the resulting GHG emissions could be less than the sum of each individual GHG emissions reduction strategy. For example, the adoption of green building standards could include components that overlap with energy efficient outdoor lighting or on-site renewable electricity generation. As the SKIA site develops, efforts will be made to monitor and track actual GHG emissions to ensure they are consistent with the intent of the subarea plan.

### **New Text**

The following footnote is hereby added to the following sentence on page 3.2-5 of the DEIS:

*To develop "lifetime" GHG emissions estimates that are similar to those produced by the King County GHG spreadsheet tool, the average building lifespan defined in the King County tool was used to factor up the annual GHG emissions estimates described above. [following footnote added here]*

The GHG emissions estimate presented in this section are for the lifetime of the buildings that are expected to be constructed if this land use plan is implemented. This building lifespan GHG emissions estimate is consistent with the methodology used in King County's GHG analysis spreadsheet. Building lifespans are assumed to be 62.5 years.

### New Calculations

The greenhouse gas emission calculation worksheets were inadvertently left out of Appendix E of the DEIS. These worksheets are hereby added to Appendix E of the DEIS and are located in Appendix 3 of this FEIS.

### 3.3 Land Use

#### New Text

Table 3.3-1 lists land use categories based on specific data provided by the Kitsap County Assessor. A note has been added to the bottom of Table 3.3-1 that:

The Kitsap County Assessor's land use category *Aircraft Transport* includes 125 acres leased to Bremerton Motorsports Park for racing and driving events.

On page 3.3-3, the following sentence is hereby added to the first paragraph:

Bremerton Motorsports Park (BMP) currently leases 125 acres in the eastern portion of the Bremerton National Airport property, and currently uses an inactive airport runway for its operations. BMP has no permanent facilities, but hosts drag races, road races and other driving events on ¼ mile drag strip and a temporary, 1.1 mile-long road course.

#### Typographical Error

On page 3.3-7, the sentence in the third bullet hereby reads:

- Power plants and other facilities that generate ~~stream~~ steam or thermal plumes

#### Text Clarification

On page 3.3-18, the paragraph under Employment and Population is hereby revised to read:

"Under all alternatives, employment would increase and residential development would not be permitted in SKIA. Population increase in SKIA would therefore be negligible under all alternatives. The alternatives differ in the amount of employment expected, percentage of increase in SKIA compared to overall employment growth in Bremerton, allocation of employment growth to specific subareas of SKIA and in the mix of employment uses."

**New Text**

Paragraph 3 on page 3.3-19 is hereby revised to read:

~~The majority of new Industrial~~ development within the Olympic View Industrial Park (Area B) is expected to continue in a similar pattern as the current park, with primarily one story buildings, landscaping, surface parking and other features common in a business park setting. In addition, Bremerton Motorsports Park is currently in negotiations with the Port of Bremerton regarding a new multi-purpose motorsports facility that may be constructed on approximately 250 acres of Port property in Area B as further discussed on page 3.3-21. This facility would potentially include significant surface parking, outdoor racing facilities, spectator grandstands and amenities, landscaping and other components. The proposed BMP would establish a different land use pattern in this portion of the project area than currently exists. *(paragraph break inserted)*

The pattern of future development in Area A is less certain, but could be expected to include one or two story aircraft related businesses, transportation, shipping and other airport compatible development. Development would likely take a business park form south of the airport and perhaps aircraft related hangers and buildings east of the airport.

**New Text**

On page 3.3-21 the following edits are hereby made to the text:

In addition to allowing light industrial, heavy industrial, recycling, outdoor storage, warehousing and transportation facilities, a variety of other uses are allowed in SKIA. These include: *automobile service and repair, car wash, drive-through facility, gas station, general office and business services over five thousand gross square feet, kennel, nursery and greenhouse, public administration, outdoor athletic fields, stadiums and sports complexes, veterinary clinics and wireless communication facilities.* At least three of these pose potential incompatibilities or conflicts with industrial uses anticipated for SKIA. *General office, public administration and stadiums and sports complexes* raise potential compatibility concerns when located near industrial uses. "Un-related office uses" are specifically identified in the current PSRC MIC *Designation Criteria* as a concern. Notably, the Industrial zone in Bremerton does not allow general retail or residential as permitted uses, consistent with PSRC policies. Group Residential Facilities are

allowed with a Conditional Use Permit “only if the facility will not create an operational conflict with the efficiency of large-scale industrial uses”. (paragraph break inserted)

Although not called out by the PSRC in their policy or administrative documents, recreation uses, such as sports stadiums or motorsports facilities could pose potential compatibility issues with industrial uses if located in close proximity. Impacts could include traffic associated with sporting events disrupting the movement of goods, customers and employees. Recreation uses that include significant outdoor lighting, tall structures and/or large numbers of spectators could also pose potential concerns with regards to airport operations. Industrial uses in close proximity to spectators could also raise concerns about noise and emissions.

The current Bremerton Motorsports Park (BMP) is located along the eastern boundary of the Bremerton National Airport property (Area A) and utilizes an inactive runway for its operations. Site access is provided via SW Old Clifton Road. The current location is not located near any active industrial or commercial use, and no existing land use compatibility impacts have been noted at this site.

The current BMP facility will be displaced by the construction of future phases of the SKIA Connector Road. BMP and the Port of Bremerton are currently in negotiations regarding a new facility that may be constructed on approximately 250 acres of Port property in Area B. Preliminary plans indicate the potential for a 1/4 mile drag strip, paved oval track, paved space for autocross events, area for motocross events, 1.5 - 2.5 mile road racing course, an RV Park and parking for approximately 5,000 vehicles. BMP also hopes to include additional development, such as offices, garage space, meeting rooms, covered grandstands, areas for related commercial activity and additional fan amenities, according to information provided on the BMP website. BMP has indicated in a letter that most events would be on weekends and evenings during times when most businesses in SKIA are closed or less active.

While the proposed BMP facility would be expected to act as a draw for certain businesses, the proposed BMP facility has the potential to result in compatibility impacts with adjacent and future industrial development, depending on the final location and

design of the facility. Specific mitigation, including (but not limited to) transportation improvements, access restrictions and other measures to ensure freight mobility and address traffic congestion could address potential impacts. In addition, location and design of the BMP should consider limitations on operating hours, setbacks and landscape buffers, and the need for future industrial access to the rail line. Impacts and mitigation associated with the BMP would need to be addressed through a separate SEPA analysis. *(paragraph break added)*

~~Notably, the Industrial zone in Bremerton does not allow general retail or residential as permitted uses, consistent with PSRC policies. Group Residential Facilities are allowed with a Conditional Use Permit "only if the facility will not create an operational conflict with the efficiency of large-scale industrial uses".~~

### 3.6 Transportation

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#### Typographical Error

The text on page 3.6-12 hereby reads:

"Given the uncertainties related to future transportation finance, none of the BEDS projects were assumed to be in place under 2030 conditions."

#### New Text and Tables

The Washington State Department of Transportation (WSDOT) clarified that the agency would use the LOS standard of C for SR 3 from Sunnyslope Road to the county line, consistent with the current rural classification for this portion of roadway. The result of this change is that Intersection 1, SR 3 / Old Clifton Road; Intersection 2, SR 3 / Lake Flora Road; and Intersection 3, SR 3 / Imperial Way have been assessed using LOS C standards.

The following table, which is based on the traffic data provided in Appendix H of the DEIS, provides the delay and LOS at these intersections under existing and future scenarios.

| DELAY AND LEVEL OF SERVICE, INTERSECTIONS 1-3, BY SCENARIO |              |                       |                              |                              |
|------------------------------------------------------------|--------------|-----------------------|------------------------------|------------------------------|
| Intersection                                               | Existing LOS | 2030 No Action<br>LOS | 2030<br>Alternative 2<br>LOS | 2030<br>Alternative 3<br>LOS |
| 1. SR 3 / Old Clifton Road                                 | 23 / C       | 37 / D                | 111 / F                      | 122 / F                      |
| 2. SR 3 / Lake Flora Road                                  | 21 / C       | 60 / F                | >150 / F                     | >150 / F                     |
| 3. SR 3 / Imperial Way                                     | 11 / B       | 49 / D                | >150 / F                     | >150 / F                     |

**Source: Fehr & Peers, 2011**

Under 2030 No Action conditions, all three intersections are expected to operate at levels exceeding the LOS C standard. The two "Action" alternatives would exacerbate this condition. The following table provides information by future scenario on mitigation options that will allow each intersection location to function at LOS C. It is likely that the federal classification for these locations may be modified based on the 2010 Census. Such revision would reduce the mitigation necessary to return these facilities to acceptable (LOS D instead of LOS C) operating conditions.

| INTERSECTION MITIGATION TO REACH LOS C |                                  |                                                                                                                    |                                                                                                                                                                                                                                                                                                        |
|----------------------------------------|----------------------------------|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Intersection                           | 2030 No Action                   | 2030 Alternative 2                                                                                                 | 2030 Alternative 3                                                                                                                                                                                                                                                                                     |
| 1. SR 3 / Old Clifton Road             | Belfair Bypass Construction      | Belfair Bypass and addition of northbound and southbound through lanes on SR 3                                     | Belfair Bypass and addition of northbound and southbound through lanes on SR 3                                                                                                                                                                                                                         |
| 2. SR 3 / Lake Flora Road              | Signalization                    | Signalization, additional northbound and southbound through lanes on SR 3, new northbound right turn lane on SR 3. | Signalization, additional northbound and southbound through lanes on SR 3, new northbound right turning lane on SR 3, revise approach on Lake Flora Road to include a dedicated left turn lane, dedicated right turn lane, and shared left/right turning lane (one additional lane on Lake Flora Road) |
| 3. SR 3 / Imperial Way                 | Widen SR 3 to four through lanes | Widen SR 3 to four through lanes                                                                                   | Widen SR 3 to six lanes or grade separated interchange                                                                                                                                                                                                                                                 |

**Source: Fehr & Peers, 2011**

### New Text

On page 3.6-31, the following information is hereby added related to the discussion of the Collision Analysis Location (CAL):

"WSDOT has programmed a safety improvement project on SR 3/Lake Flora Road to address an identified CAL. The project will construct a northbound right turn lane to Lake Flora Road, lengthen the center refuge lane into a center acceleration lane, and widen SR 3 in the vicinity of the intersection to provide a wider receiving lane for the acceleration lane. The project will also

install centerline rumble strips. The design is still under development and may eventually include shoulder rumble strips as well.

Construction is expected in the 2013/2014 timeframe."

### Revised Text

1. *SR 3 / Old Clifton Road* – The poor operations at this intersection ~~are caused by the high traffic volumes on northbound and southbound SR 3~~ are due to the volume of traffic on SR 3, SR 300, and local business traffic. The Belfair Bypass is identified in the BEDS report as one of the highest priority project in the SR 3 corridor. This bypass would reduce the amount of through traffic on "old SR 3" through the Belfair community, but would not reduce local trips or trips to/from the North Shore area on SR 300 or trips through Belfair which are traveling to/from SR 106. Based on an origin destination analysis described in the *Belfair Bypass Proviso Report* (WSDOT 2010) the bypass will likely not lead to a sufficient amount of diversion to result in LOS D or better operations at this intersection, although the congestion levels will improve when compared to the option without the bypass. Outside of the diverted trips, the only intersection configuration that improves this intersection to LOS D or better is the addition of northbound and southbound through lanes on "Old SR 3."

However additional lanes are potentially inconsistent with the current Belfair Area Widening and Safety Improvements project (currently funded for construction in 2012) to add a two-way left turn lane on SR 3 south of this intersection, and ~~may be~~ is likely infeasible due to right-of-way impacts and the configuration of the railroad undercrossing located north of Belfair. This impact is considered significant and unavoidable.

## 3.8 Utilities

### New Text

The following sentence has been added to the last paragraph on page 3.8-1:

The Port of Bremerton reported that in 2010, the Port's treatment facility treated an average of 24,000 gallons per day or 33% of its rated capacity.

## Section 4 - Distribution List

## 4. DISTRIBUTION LIST

The following parties have been provided a notice of availability of the Final EIS. Those marked with an asterisk (\*) were provided an electronic copy of the Final EIS. Paper copies are available upon request by calling 360.473.5845.

### State and Federal Agencies

US Environmental Protection Agency\*  
 Federal Aviation Administration\*  
 Naval Base Kitsap\*  
 WA Department of Archaeology and Historic Preservation  
 WA Department of Commerce, Growth Management Services\*  
 WA Department of Corrections, Capital Program  
 WA Department of Ecology\* (2 copies)  
 WA Department of Fish and Wildlife\*  
 WA Department of Natural Resources\*  
 WA Department of Transportation\*  
 WA Department of Transportation, Aviation Division\*

### Tribes

Suquamish Tribe\*  
 Port Gamble/S'Klallam Tribe\*  
 Skokomish Tribe  
 Squaxin Island Tribe

### Regional and Local Governments

Kitsap Regional Coordinating Council\*  
 Puget Sound Clean Air Agency  
 Puget Sound Regional Council\*  
 Kitsap County\*  
 City of Port Orchard\*  
 Mason County\*

### Special Purpose Service Providers

Kitsap Regional Library, Downtown Bremerton Branch\*  
 Olympic College  
 Port of Bremerton\*  
 Puget Sound & Pacific Railroad  
 Sunnyslope Water District No. 15\*

### Community Organizations

Bremerton Chamber of Commerce

Hood Canal Coordinating Council  
Kitsap Economic Development Alliance  
Port Orchard Chamber of Commerce  
Sustainable Bremerton

**Private Firms and Individuals**

Overton Associates  
McCormick Land Company  
Alpine Evergreen  
Alpine Evergreen Inc  
Ataee, Tony  
Bremerton, City Of  
Bremerton Trap & Skeet Club  
Bright Family Llc  
C & I Real Estate Llc  
Coulter Creek Lp  
Cross, Jerrie L  
Dean, Jack E  
Dobson, Laura  
Dobson, Scott D & Kathleen M  
Edquid, Art C  
Esska Llc  
Esslinger, Richard A  
Feddock, Steven P Jr  
Gardner Family Trust, The  
James, Elva R  
Laceda, Edgardo A & Nellie O  
Liberty Business Centers Llc  
Mcdonald, David  
Mungra, Mahesh & Nirmala & Sabhaya, Mansukh & Pragna  
North Bay Properties Lp  
North Mason Lp  
Paije Properties Llc  
Palmer Properties Llc  
Port Of Bremerton  
Potter, Patricia E  
Rodeo Drive In Theatre  
Rogers, Sandra K  
Sande, Earl & Burnett Amy  
Sayer, Betty J  
Schillinger, C R & Patricia M & Johnson, Thomas W & Karen J  
Schmidt, Paul A & Mary E  
Schoening, Clifford & Marion

Southwest Kitsap Lp  
St Trust  
Sylvan Products Inc  
U S A In Trust  
Victory Business Park Llc  
Viking Fence of Poulsbo Llc  
Weegman, Aaron D  
Yelverton, Michael W & Beverly K

**Media**

Kitsap Sun  
Kitsap Business Journal  
Northwest Navigator

**Additional DEIS Commenters not listed above**

Bremerton Motorsports Park  
McCollough Hill Leary, PS  
Doug Skrobut  
Adam Victor  
Roger Zabinski  
Tim Thomson

# Appendix 1

## Appendix 1. Preferred Alternative Utilities Description

Following the identification of the preferred alternative for SKIA, a more specific set of utility flow calculations and improvements for water and sewer were developed.

The anticipated water demand and sewer production estimation was lowered to just under 0.5MGD based on conversations with the City of Bremerton Public Works staff and additional review of the SKIA Sewer Study performed by HDR.

In the Draft EIS, a conservative assumption of 150 gallons per day per employee was used in water and sewer flow estimations. This number was derived by assuming 3,000 gallons per day per developed acre or industrial land and assuming 20 employees per acre. As with Alternative 2, the Preferred Alternative projects 6,500 new jobs in SKIA. This falls between the SKIA sewer study "high growth" scenario of 2,860 jobs and the "full build out scenario" of 9,771 jobs. Analysis of the flows in the SKIA sewer study shows a per job flow number of 35 gpd/employee for the "high growth" scenario and 146 gpd/employee for the "full build out" scenario. Averaging these two scenarios results in a per job flow of 90.7 gpd/employee. To be consistent with the SKIA Sewer Study and be more reflective of the anticipated type of development, a planning number of 90 gpd/industrial employee was used to forecast flow. The flow of 25 gpd/employee for commercial uses did not change from the previous analysis.

The water system improvements shown in the SKIA capital facilities plan is consistent with what was described in general in the required mitigation section for Alternative 2. The approach to provide sewer service differs somewhat from what was described in general in the mitigation section for Alternative 2.

The wastewater improvements shown in the SKIA capital facilities plan consists of two proposed MBR plants, one in Area B serving Areas B & G and another in Area C serving the balance of SKIA. These plants would handle an expected average daily flow of 0.22 MGD and 0.27 MGD respectively. These two plants by their design and location would make reclaimed water available along the length of Highway 3 throughout SKIA. The reclaimed water would be piped to large potential users of the reclaimed water such as the Gold Mountain Golf Course and Fred Hill Materials as described in the City of Bremerton Wastewater Comprehensive Plan. The reclaimed water would then be available for non-potable uses such as toilet flushing and irrigation for others within SKIA. The SKIA capital facilities plan also shows a winter disposal irrigation

area for each MBR plant to recharge groundwater with any effluent not consumed. By having two separate MBR plants, one in the north and one in the south of SKIA, it allows the MBR plants to be built as development occurs, whether in the north or the south first.

## Appendix 2

HCM Signalized Intersection Capacity Analysis  
3: SR 3 & Imperial Way (driveway)

SKIA 2030 Analysis  
3/9/2011

|                                   |  |  |  |  |  |  |  |  |  |  |  |  |
|-----------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| Movement                          | EBL                                                                               | EBT                                                                               | EBR                                                                               | WBL                                                                               | WBT                                                                               | WBR                                                                               | NBL                                                                                 | NBT                                                                                 | NBR                                                                                 | SBL                                                                                 | SBT                                                                                 | SBR                                                                                 |
| Lane Configurations               |  |  |  |  |  |  |                                                                                     |   |                                                                                     |  |  |  |
| Ideal Flow (vphpl)                | 1800                                                                              | 1800                                                                              | 1800                                                                              | 1800                                                                              | 1800                                                                              | 1800                                                                              | 1800                                                                                | 1800                                                                                | 1800                                                                                | 1800                                                                                | 1800                                                                                | 1800                                                                                |
| Total Lost time (s)               | 4.0                                                                               | 4.0                                                                               | 4.0                                                                               | 4.0                                                                               | 4.0                                                                               | 4.0                                                                               |                                                                                     | 4.0                                                                                 |                                                                                     | 4.0                                                                                 | 4.0                                                                                 | 4.0                                                                                 |
| Lane Util. Factor                 | 1.00                                                                              | 0.91                                                                              | 1.00                                                                              | 1.00                                                                              | 0.95                                                                              | 1.00                                                                              |                                                                                     | 1.00                                                                                |                                                                                     | 0.95                                                                                | 0.95                                                                                | 1.00                                                                                |
| Frt                               | 1.00                                                                              | 1.00                                                                              | 0.85                                                                              | 1.00                                                                              | 1.00                                                                              | 0.85                                                                              |                                                                                     | 0.89                                                                                |                                                                                     | 1.00                                                                                | 1.00                                                                                | 0.85                                                                                |
| Flt Protected                     | 0.95                                                                              | 1.00                                                                              | 1.00                                                                              | 0.95                                                                              | 1.00                                                                              | 1.00                                                                              |                                                                                     | 0.99                                                                                |                                                                                     | 0.95                                                                                | 0.95                                                                                | 1.00                                                                                |
| Satd. Flow (prot)                 | 1541                                                                              | 4680                                                                              | 1378                                                                              | 1541                                                                              | 3288                                                                              | 1378                                                                              |                                                                                     | 1440                                                                                |                                                                                     | 1464                                                                                | 1471                                                                                | 1378                                                                                |
| Flt Permitted                     | 0.95                                                                              | 1.00                                                                              | 1.00                                                                              | 0.95                                                                              | 1.00                                                                              | 1.00                                                                              |                                                                                     | 0.94                                                                                |                                                                                     | 0.60                                                                                | 0.58                                                                                | 1.00                                                                                |
| Satd. Flow (perm)                 | 1541                                                                              | 4680                                                                              | 1378                                                                              | 1541                                                                              | 3288                                                                              | 1378                                                                              |                                                                                     | 1362                                                                                |                                                                                     | 925                                                                                 | 894                                                                                 | 1378                                                                                |
| Volume (vph)                      | 90                                                                                | 1610                                                                              | 20                                                                                | 30                                                                                | 1400                                                                              | 20                                                                                | 20                                                                                  | 10                                                                                  | 110                                                                                 | 400                                                                                 | 10                                                                                  | 310                                                                                 |
| Peak-hour factor, PHF             | 0.92                                                                              | 0.92                                                                              | 0.92                                                                              | 0.92                                                                              | 0.92                                                                              | 0.92                                                                              | 0.92                                                                                | 0.92                                                                                | 0.92                                                                                | 0.92                                                                                | 0.92                                                                                | 0.92                                                                                |
| Adj. Flow (vph)                   | 98                                                                                | 1750                                                                              | 22                                                                                | 33                                                                                | 1522                                                                              | 22                                                                                | 22                                                                                  | 11                                                                                  | 120                                                                                 | 435                                                                                 | 11                                                                                  | 337                                                                                 |
| RTOR Reduction (vph)              | 0                                                                                 | 0                                                                                 | 10                                                                                | 0                                                                                 | 0                                                                                 | 10                                                                                | 0                                                                                   | 86                                                                                  | 0                                                                                   | 0                                                                                   | 0                                                                                   | 101                                                                                 |
| Lane Group Flow (vph)             | 98                                                                                | 1750                                                                              | 12                                                                                | 33                                                                                | 1522                                                                              | 12                                                                                | 0                                                                                   | 67                                                                                  | 0                                                                                   | 218                                                                                 | 228                                                                                 | 236                                                                                 |
| Heavy Vehicles (%)                | 11%                                                                               | 5%                                                                                | 11%                                                                               | 11%                                                                               | 4%                                                                                | 11%                                                                               | 11%                                                                                 | 11%                                                                                 | 11%                                                                                 | 11%                                                                                 | 11%                                                                                 | 11%                                                                                 |
| Turn Type                         | Prot                                                                              |                                                                                   | Perm                                                                              | Prot                                                                              |                                                                                   | Perm                                                                              | Perm                                                                                |                                                                                     |                                                                                     | Perm                                                                                |                                                                                     | Perm                                                                                |
| Protected Phases                  | 7                                                                                 | 4                                                                                 |                                                                                   | 3                                                                                 | 8                                                                                 |                                                                                   |                                                                                     | 2                                                                                   |                                                                                     |                                                                                     | 6                                                                                   |                                                                                     |
| Permitted Phases                  |                                                                                   |                                                                                   | 4                                                                                 |                                                                                   |                                                                                   | 8                                                                                 | 2                                                                                   |                                                                                     |                                                                                     | 6                                                                                   |                                                                                     | 6                                                                                   |
| Actuated Green, G (s)             | 6.3                                                                               | 49.9                                                                              | 49.9                                                                              | 3.5                                                                               | 47.1                                                                              | 47.1                                                                              |                                                                                     | 25.4                                                                                |                                                                                     | 25.4                                                                                | 25.4                                                                                | 25.4                                                                                |
| Effective Green, g (s)            | 6.3                                                                               | 49.9                                                                              | 49.9                                                                              | 3.5                                                                               | 47.1                                                                              | 47.1                                                                              |                                                                                     | 25.4                                                                                |                                                                                     | 25.4                                                                                | 25.4                                                                                | 25.4                                                                                |
| Actuated g/C Ratio                | 0.07                                                                              | 0.55                                                                              | 0.55                                                                              | 0.04                                                                              | 0.52                                                                              | 0.52                                                                              |                                                                                     | 0.28                                                                                |                                                                                     | 0.28                                                                                | 0.28                                                                                | 0.28                                                                                |
| Clearance Time (s)                | 4.0                                                                               | 4.0                                                                               | 4.0                                                                               | 4.0                                                                               | 4.0                                                                               | 4.0                                                                               |                                                                                     | 4.0                                                                                 |                                                                                     | 4.0                                                                                 | 4.0                                                                                 | 4.0                                                                                 |
| Vehicle Extension (s)             | 3.0                                                                               | 3.0                                                                               | 3.0                                                                               | 3.0                                                                               | 3.0                                                                               | 3.0                                                                               |                                                                                     | 3.0                                                                                 |                                                                                     | 3.0                                                                                 | 3.0                                                                                 | 3.0                                                                                 |
| Lane Grp Cap (vph)                | 107                                                                               | 2572                                                                              | 757                                                                               | 59                                                                                | 1706                                                                              | 715                                                                               |                                                                                     | 381                                                                                 |                                                                                     | 259                                                                                 | 250                                                                                 | 385                                                                                 |
| v/s Ratio Prot                    | c0.06                                                                             | c0.37                                                                             |                                                                                   | 0.02                                                                              | c0.46                                                                             |                                                                                   |                                                                                     |                                                                                     |                                                                                     |                                                                                     |                                                                                     |                                                                                     |
| v/s Ratio Perm                    |                                                                                   |                                                                                   | 0.01                                                                              |                                                                                   |                                                                                   | 0.01                                                                              |                                                                                     | 0.05                                                                                |                                                                                     | 0.24                                                                                | c0.26                                                                               | 0.17                                                                                |
| v/c Ratio                         | 0.92                                                                              | 0.68                                                                              | 0.02                                                                              | 0.56                                                                              | 0.89                                                                              | 0.02                                                                              |                                                                                     | 0.17                                                                                |                                                                                     | 0.84                                                                                | 0.91                                                                                | 0.61                                                                                |
| Uniform Delay, d1                 | 42.0                                                                              | 14.7                                                                              | 9.3                                                                               | 42.9                                                                              | 19.6                                                                              | 10.6                                                                              |                                                                                     | 24.8                                                                                |                                                                                     | 30.8                                                                                | 31.6                                                                                | 28.4                                                                                |
| Progression Factor                | 1.00                                                                              | 1.00                                                                              | 1.00                                                                              | 1.00                                                                              | 1.00                                                                              | 1.00                                                                              |                                                                                     | 1.00                                                                                |                                                                                     | 1.00                                                                                | 1.00                                                                                | 1.00                                                                                |
| Incremental Delay, d2             | 60.4                                                                              | 0.8                                                                               | 0.0                                                                               | 11.0                                                                              | 6.4                                                                               | 0.0                                                                               |                                                                                     | 0.2                                                                                 |                                                                                     | 21.2                                                                                | 34.3                                                                                | 2.9                                                                                 |
| Delay (s)                         | 102.4                                                                             | 15.5                                                                              | 9.3                                                                               | 53.9                                                                              | 25.9                                                                              | 10.6                                                                              |                                                                                     | 25.0                                                                                |                                                                                     | 52.0                                                                                | 65.9                                                                                | 31.3                                                                                |
| Level of Service                  | F                                                                                 | B                                                                                 | A                                                                                 | D                                                                                 | C                                                                                 | B                                                                                 |                                                                                     | C                                                                                   |                                                                                     | D                                                                                   | E                                                                                   | C                                                                                   |
| Approach Delay (s)                |                                                                                   | 19.9                                                                              |                                                                                   |                                                                                   | 26.3                                                                              |                                                                                   |                                                                                     | 25.0                                                                                |                                                                                     |                                                                                     | 47.1                                                                                |                                                                                     |
| Approach LOS                      |                                                                                   | B                                                                                 |                                                                                   |                                                                                   | C                                                                                 |                                                                                   |                                                                                     | C                                                                                   |                                                                                     |                                                                                     | D                                                                                   |                                                                                     |
| <b>Intersection Summary</b>       |                                                                                   |                                                                                   |                                                                                   |                                                                                   |                                                                                   |                                                                                   |                                                                                     |                                                                                     |                                                                                     |                                                                                     |                                                                                     |                                                                                     |
| HCM Average Control Delay         |                                                                                   |                                                                                   | 27.3                                                                              |                                                                                   |                                                                                   |                                                                                   | HCM Level of Service                                                                |                                                                                     |                                                                                     | C                                                                                   |                                                                                     |                                                                                     |
| HCM Volume to Capacity ratio      |                                                                                   |                                                                                   | 0.94                                                                              |                                                                                   |                                                                                   |                                                                                   |                                                                                     |                                                                                     |                                                                                     |                                                                                     |                                                                                     |                                                                                     |
| Actuated Cycle Length (s)         |                                                                                   |                                                                                   | 90.8                                                                              |                                                                                   |                                                                                   |                                                                                   | Sum of lost time (s)                                                                |                                                                                     |                                                                                     | 16.0                                                                                |                                                                                     |                                                                                     |
| Intersection Capacity Utilization |                                                                                   |                                                                                   | 80.0%                                                                             |                                                                                   |                                                                                   |                                                                                   | ICU Level of Service                                                                |                                                                                     |                                                                                     | D                                                                                   |                                                                                     |                                                                                     |
| Analysis Period (min)             |                                                                                   |                                                                                   | 15                                                                                |                                                                                   |                                                                                   |                                                                                   |                                                                                     |                                                                                     |                                                                                     |                                                                                     |                                                                                     |                                                                                     |
| c Critical Lane Group             |                                                                                   |                                                                                   |                                                                                   |                                                                                   |                                                                                   |                                                                                   |                                                                                     |                                                                                     |                                                                                     |                                                                                     |                                                                                     |                                                                                     |

# HCM Signalized Intersection Capacity Analysis

## 4: SR 3 & Sunnyslope Rd

SKIA 2030 Analysis  
3/9/2011

|                                   | →     | ↘    | ↙     | ←     | ↖                    | ↗    |
|-----------------------------------|-------|------|-------|-------|----------------------|------|
| Movement                          | EBT   | EBR  | WBL   | WBT   | NBL                  | NBR  |
| Lane Configurations               | ↑↑↑   |      | ↘     | ↑↑    | ↘                    |      |
| Ideal Flow (vphpl)                | 1800  | 1800 | 1800  | 1800  | 1800                 | 1800 |
| Total Lost time (s)               | 4.0   |      | 4.0   | 4.0   | 4.0                  |      |
| Lane Util. Factor                 | 0.91  |      | 1.00  | 0.95  | 1.00                 |      |
| Frt                               | 1.00  |      | 1.00  | 1.00  | 0.91                 |      |
| Flt Protected                     | 1.00  |      | 0.95  | 1.00  | 0.98                 |      |
| Satd. Flow (prot)                 | 4621  |      | 1598  | 3196  | 1534                 |      |
| Flt Permitted                     | 1.00  |      | 0.95  | 1.00  | 0.98                 |      |
| Satd. Flow (perm)                 | 4621  |      | 1598  | 3196  | 1534                 |      |
| Volume (vph)                      | 3160  | 70   | 140   | 1650  | 50                   | 100  |
| Peak-hour factor, PHF             | 0.94  | 0.94 | 0.96  | 0.96  | 0.92                 | 0.92 |
| Adj. Flow (vph)                   | 3362  | 74   | 146   | 1719  | 54                   | 109  |
| RTOR Reduction (vph)              | 1     | 0    | 0     | 0     | 49                   | 0    |
| Lane Group Flow (vph)             | 3435  | 0    | 146   | 1719  | 114                  | 0    |
| Heavy Vehicles (%)                | 6%    | 6%   | 7%    | 7%    | 5%                   | 5%   |
| Turn Type                         |       |      | Prot  |       |                      |      |
| Protected Phases                  | 4     |      | 3     | 8     | 2                    |      |
| Permitted Phases                  |       |      |       |       |                      |      |
| Actuated Green, G (s)             | 108.0 |      | 14.0  | 126.0 | 14.1                 |      |
| Effective Green, g (s)            | 108.0 |      | 14.0  | 126.0 | 14.1                 |      |
| Actuated g/C Ratio                | 0.73  |      | 0.09  | 0.85  | 0.10                 |      |
| Clearance Time (s)                | 4.0   |      | 4.0   | 4.0   | 4.0                  |      |
| Vehicle Extension (s)             | 3.0   |      | 3.0   | 3.0   | 3.0                  |      |
| Lane Grp Cap (vph)                | 3370  |      | 151   | 2719  | 146                  |      |
| v/s Ratio Prot                    | c0.74 |      | c0.09 | 0.54  | c0.07                |      |
| v/s Ratio Perm                    |       |      |       |       |                      |      |
| v/c Ratio                         | 1.02  |      | 0.97  | 0.63  | 0.78                 |      |
| Uniform Delay, d1                 | 20.0  |      | 66.8  | 3.6   | 65.5                 |      |
| Progression Factor                | 1.00  |      | 1.00  | 1.00  | 1.00                 |      |
| Incremental Delay, d2             | 20.6  |      | 62.6  | 0.5   | 23.3                 |      |
| Delay (s)                         | 40.6  |      | 129.4 | 4.1   | 88.8                 |      |
| Level of Service                  | D     |      | F     | A     | F                    |      |
| Approach Delay (s)                | 40.6  |      |       | 13.9  | 88.8                 |      |
| Approach LOS                      | D     |      |       | B     | F                    |      |
| Intersection Summary              |       |      |       |       |                      |      |
| HCM Average Control Delay         |       |      | 32.9  |       | HCM Level of Service | C    |
| HCM Volume to Capacity ratio      |       |      | 0.99  |       |                      |      |
| Actuated Cycle Length (s)         |       |      | 148.1 |       | Sum of lost time (s) | 12.0 |
| Intersection Capacity Utilization |       |      | 93.7% |       | ICU Level of Service | F    |
| Analysis Period (min)             |       |      | 15    |       |                      |      |
| c Critical Lane Group             |       |      |       |       |                      |      |

|        |             |
|--------|-------------|
| 520.01 | General     |
| 520.02 | References  |
| 520.03 | Definitions |
| 520.04 | Vocabulary  |

### 520.01 General

The Washington State Department of Transportation (WSDOT) controls access to the state's highways (with a few exceptions) in order to preserve the safety and efficiency of these highways as well as the public investment. All Washington State highways are distinguished as being either *limited access* or *managed access* highways. Control of access is accomplished by either acquiring rights of access from abutting property owners (limited access control) or by regulating access connections to the highway (managed access control). Until limited access rights have been acquired from abutting property owners, the route is a managed access highway. Managed access permits are issued either by a local authority (city or town) or by WSDOT.

Numerous studies have shown that controlling and limiting access to highways is a cost-effective way to help maintain the safety, capacity, and functional integrity of a highway. Adding more lanes to an existing highway is expensive and frequently not possible. Controlling access to our state highways, by promoting the use of frontage roads or other existing county or city roads and advocating the internal shared circulation within adjacent developments, is a proactive and cost-effective way to accomplish this objective.

WSDOT has been purchasing access rights and implementing limited access control since 1951 ([RCW 47.52](#)). While this has been effective, it is an expensive way to control access to the state highway system. Adequate funding to accomplish the purchasing of access rights has not kept up with the state's continuous population growth and land use development over the years. As a result, state lawmakers introduced a bill in the early 1990s titled "Highway Access Management," recognizing that controlling access to the state highway system by regulation was a cost-effective means to preserve the safety and capacity of our state highway system.

In 1991, the Legislature passed and the Governor approved [RCW 47.50](#), titled "Highway access management." This new law directed WSDOT to develop new rules to be included in the Washington Administrative Code for those state highways not already limited access highways. The result was a new class of access control called managed access.

[Chapter 530](#) describes limited access highways in greater detail. [Chapter 540](#) describes managed access highways in greater detail.

The following references and definitions apply to Washington's access control as presented in Chapters [530](#) and [540](#).

## 520.02 References

### (1) Federal/State Laws and Codes

[Revised Code of Washington \(RCW\) 18.43](#), Engineers and land surveyors

[RCW 35.78](#), Streets – Classification and design standards

[RCW 46.61](#), Rules of the road

[RCW 47.17](#), State highway routes

[RCW 47.24](#), City streets as part of state highways

[RCW 47.32](#), Obstructions on right-of-way

[RCW 47.50](#), Highway access management

[RCW 47.52](#), Limited access facilities

[Washington Administrative Code \(WAC\) 468-51](#), Highway access management access permits – Administrative process

[WAC 468-52](#), Highway access management – Access control classification system and standards

[WAC 468-54](#), Limited access hearings

[WAC 468-58](#), Limited access highways

### (2) Design Guidance

[Agreements Manual](#), M 22-99, WSDOT

[Manual on Uniform Traffic Control Devices for Streets and Highways](#), USDOT, FHWA; as adopted and modified by Chapter 468-95 WAC “Manual on Uniform Traffic Control Devices for Streets and Highways” (MUTCD)

[Plans Preparation Manual](#), M 22-31, WSDOT

[Right of Way Manual](#), M 26-01, WSDOT

[Utilities Accommodation Policy](#), M 22-86, WSDOT

WSDOT Headquarters (HQ) Access and Hearings Section’s Internet page:

🔗 [www.wsdot.wa.gov/design/accessandhearings](http://www.wsdot.wa.gov/design/accessandhearings)

### (3) Supporting Information

[Access Management Manual](#), Transportation Research Board (TRB), Washington DC, 2003

[Highways Over National Forest Lands](#), MOU between WSDOT and USFS, M 22-50, 2002: 🔗 [www.wsdot.wa.gov/publications/manuals/m22-50.htm](http://www.wsdot.wa.gov/publications/manuals/m22-50.htm)

### 520.03 Definitions

**access** A means of entering or leaving a public road, street, or highway with respect to abutting property or another public road, street, or highway.

**access control** The limiting and regulating of public and private access to Washington State's highways, as required by state law.

**Access Control Tracking System Limited Access and Managed Access Master Plan** A database list, related to highway route numbers and mileposts, that identifies either the level of limited access or the class of managed access:

 [www.wsdot.wa.gov/design/accessandhearings](http://www.wsdot.wa.gov/design/accessandhearings)

**access connection** See *approach and access connection*.

**access connection permit** A written authorization issued by the permitting authority for a specifically designed access connection to a managed access highway at a specific location; for a specific type and intensity of property use; and for a specific volume of traffic for the access connection based on the final stage of the development of the applicant's property. The actual form used for this authorization is determined by the permitting authority.

**access deviation** A deviation (see [Chapter 300](#)) that authorizes deferring or staging acquisition of limited access control, falling short of a 300-foot requirement, or allowing an existing access point to stay within 130 feet of an intersection on a limited access highway. Approval by the State Design Engineer is required (see [Chapter 530](#)).

**access hearing plan** A limited access plan prepared for presentation at an access hearing.

**access point** Any point that allows private or public entrance to or exit from the traveled way of a state highway, including "locked gate" access and maintenance access points.

**access point spacing** On a managed access highway, the distance between two adjacent access points on one side of the highway, measured along the edge of the traveled way from one access point to the next (see also *corner clearance*).

**access report plan** A limited access plan prepared for presentation to local governmental officials at preliminary meetings before preparation of the access hearing plan.

**access rights** Property rights that allow an abutting property owner to enter and leave the public roadway system.

**allowed** Authorized.

**application for an access connection** An application provided by the permitting authority to be completed by the applicant for access to a managed access highway.

**approach and access connection** These terms are listed under the specific access section to which they apply. The first section below is for limited access highways and uses the term *approach*. The second section below is for managed access highways and uses the term *access connection*.

Approaches and access connections include any ability to leave or enter a highway right of way other than at an intersection with another road or street.

- (a) **limited access highways: approach** An access point, other than a public road/street, that allows access to or from a limited access highway on the state highway system. There are five types of approaches to limited access highways that are allowed:
- **Type A** An off and on approach in a legal manner, not to exceed 30 feet in width, for the sole purpose of serving a single-family residence. It may be reserved by the abutting owner for specified use at a point satisfactory to the state at or between designated highway stations. This approach type is allowed on partial and modified control limited access highways.
  - **Type B** An off and on approach in a legal manner, not to exceed 50 feet in width, for use necessary to the normal operation of a farm, but not for retail marketing. It may be reserved by the abutting owner for specified use at a point satisfactory to the state at or between designated highway stations. This approach type is allowed on partial and modified control limited access highways. This approach type may be used for wind farms when use of the approach is limited to those vehicles necessary to construct and maintain the farm for use in harvesting wind energy.
  - **Type C** An off and on approach in a legal manner, for a special purpose and width to be agreed upon. It may be specified at a point satisfactory to the state at or between designated highway stations. This approach type is allowed on partial and modified control limited access highways and on full control limited access highways where no other reasonable means of access exists, as solely determined by the department.
  - **Type D** An off and on approach in a legal manner, not to exceed 50 feet in width, for use necessary to the normal operation of a commercial establishment. It may be specified at a point satisfactory to the state at or between designated highway stations. This approach type is allowed only on modified control limited access highways.
  - **Type E** This type is no longer allowed to be constructed because of the requirements that there be only one access point per parcel on a limited access state highway.
  - **Type F** An off and on approach in a legal manner, not to exceed 30 feet in width, for the sole purpose of serving a wireless communication site. It may be specified at a point satisfactory to the state at or between designated highway stations. This approach type is allowed only on partial control limited access highways. (See [WAC 468-58-080\(vi\)](#) for further restrictions.)
- (b) **managed access highways: access connection** An access point, other than a public road/street, that permits access to or from a managed access highway on the state highway system. There are five types of access connection permits:
- **conforming access connection** A connection to a managed access highway that meets current WAC and WSDOT location, spacing, and design criteria.
  - **grandfathered access connection** Any connection to the state highway system that was in existence and in active use on July 1, 1990, and has not had a significant change in use.
  - **joint-use access connection** A single connection to a managed access highway that serves two or more properties.

- **nonconforming access connection** A connection to a managed access highway that does not meet current WSDOT location, spacing, or design criteria, pending availability of a future conforming access connection.
- **variance access connection** A connection to a managed access highway at a location not normally allowed by current WSDOT criteria.

(c) **managed access connection category** There are four access connection permit categories for managed access connections to state highways: Category I, Category II, Category III, and Category IV (see [Chapter 540](#)).

**annual daily traffic (ADT)** The volume of traffic passing a point or segment of a highway, in both directions, during a period of time, divided by the number of days in the period, and factored to represent an estimate of traffic volume for an average day of the year.

**average annual daily traffic (AADT)** The average volume of traffic passing a point or segment of a highway, in both directions, during a year.

**average weekday vehicle trip ends (AWDVTE)** The estimated total of all trips entering plus all trips leaving the applicant's site based on the final stage of proposed development.

**connection** See *approach and access connection*.

**contiguous parcels** Two or more pieces of real property, under the same ownership, with one or more boundaries that touch and have similarity of use.

**corner clearance** On a managed access highway, the distance from an intersection of a public road or street to the nearest access connection along the same side of the highway. The minimum corner clearance distance (see [Chapter 540](#), Exhibit 540-1) is measured from the closest edge of the intersecting road or street to the closest edge of the traveled way of the access connection, measured along one side of the traveled way (through lanes) (see also *access point spacing*).

**DHV** Design hourly volume.

**E&EP** WSDOT's Environmental and Engineering Programs Division.

**easement** A documented right, as a right of way, to use the property of another for designated purposes.

**findings and order (F&O)** A legal package containing information based on the hearing record from a limited access hearing (see [Chapters 210](#) and [530](#)).

**findings and order (F&O) plan** A limited access plan, prepared after a limited access hearing, which is based on the hearing record.

**HQ** WSDOT's Headquarters in Olympia.

**intersection** An at-grade access point connecting a state highway with a road or street duly established as a public road or public street by the local governmental entity.

**limited access** Full, partial, or modified access control is planned and established for each corridor and then acquired as the right to limit access to each individual parcel.

- **planned limited access control** Limited access control is planned for sometime in the future; however, no access hearing has been held.
- **established limited access control** An access hearing has been held and the Environmental and Engineering Programs Director has adopted the findings and order, which *establishes* the limits and level of control.
- **acquired limited access control** Access rights have been purchased.

**limited access highway** All highways listed as “Established L/A” on the Limited Access and Managed Access Master Plan (see below) and where the rights of direct access to or from abutting lands have been acquired from the abutting landowners.

- **full access control** This most restrictive level of limited access provides access, using interchanges, for selected public roads/streets only, and prohibits highway intersections at grade.
- **partial access control** The second most restrictive level of limited access. At-grade intersections with selected public roads are allowed, and there may be some crossings and some driveway approaches at grade. Direct commercial access is not allowed.
- **modified access control** The least restrictive level of limited access. Characteristics are the same as for partial access control except that direct commercial access is allowed.

**managed access highway** Any highway not listed as “Established L/A” on the Limited Access and Managed Access Master Plan and any highway or portion of a highway designated on the plan as “Established L/A” until such time as the limited access rights are acquired. Under managed access legislation, the property owner’s access rights are regulated through an access connection permitting process.

**Limited Access and Managed Access Master Plan** A map of Washington State that shows established and planned limited access highways:

🔗 [www.wsdot.wa.gov/design/accessandhearings](http://www.wsdot.wa.gov/design/accessandhearings)

**median** The portion of a divided highway separating vehicular traffic traveling in opposite directions.

**median opening** An opening in a continuous median for the specific purpose of allowing vehicle movement.

**MOU** Memorandum of Understanding. There is one MOU (*Highways Over National Forest Lands*) between the United States Forest Service (USFS) and WSDOT that requires the USFS to obtain a road approach permit for new access to a state highway that is crossing Forest Service land.

**permit holder** The abutting property owner or other legally authorized person to whom an access connection permit is issued by the permitting authority.

**permitted access connection** A connection for which an access connection permit has been issued by a permitting authority.

**permitting authority** The agency that has legal authority to issue managed access connection permits. For access connections in unincorporated areas, the permitting authority is WSDOT; for access connections within corporate limits, the permitting authority is a city or town.

**right of way (R/W)** A general term denoting land or interest therein, acquired for or designated for transportation purposes. More specifically, lands that have been dedicated for public transportation purposes or land in which WSDOT, a county, or a municipality owns the fee simple title, has an easement devoted to or required for use as a public road/street and appurtenant facilities, or has established ownership by prescriptive right.

**right of way and limited access plan (R/W and L/A plan)** A right of way plan that also shows limited access control details.

**road approach** A road or driveway built to provide private access to or from the state highway system.

**shoulder** The portion of the highway contiguous with the traveled lanes for the accommodation of stopped vehicles for emergency use and, where allowed, for bicycles (see [Chapter 530](#)).

**state highway system** All roads, streets, and highways designated as state routes in compliance with [RCW 47.17](#).

## 520.04 Vocabulary

The entries shown in [Exhibit 520-1](#) are examples of suitable wording for the distinctly different types of access control in Chapters [530](#) and [540](#).

These entries demonstrate the difference in terminology between limited access and managed access in the applicable WACs. For instance, there is nothing about *permit*, *connection*, *category*, or *class* in the limited access vocabulary and, likewise, nothing about *approach* or *type* in the managed access vocabulary.

Also note that [Chapter 1340](#) uses *road approach* in a generic way, unrelated to WAC legal terminology, and makes no distinction related to access control.

| Access Control Vocabulary                                                                                                                                                      |                                                                                                                                                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| functional classification of highways                                                                                                                                          | <a href="#">Chapter 1140</a>                                                                                                                   |
| intersections at grade, geometrics                                                                                                                                             | <a href="#">Chapter 1310</a>                                                                                                                   |
| roundabout geometrics                                                                                                                                                          | <a href="#">Chapter 1320</a>                                                                                                                   |
| road approach geometrics                                                                                                                                                       | <a href="#">Chapter 1340</a>                                                                                                                   |
| interchange geometrics                                                                                                                                                         | <a href="#">Chapter 1360</a>                                                                                                                   |
| freeway access point                                                                                                                                                           | <a href="#">Chapter 550</a>                                                                                                                    |
| Limited Access Highway (Chapter 530)                                                                                                                                           | Managed Access Highway (Chapter 540)                                                                                                           |
| Access point (freeway ramp or other access break)                                                                                                                              | Access point (public or not) <ul style="list-style-type: none"> <li>• Public access point</li> <li>• Access connection (not public)</li> </ul> |
| Approach (street, road, driveway) <ul style="list-style-type: none"> <li>• Road approach (street, road, driveway)</li> <li>• Driveway approach (not street or road)</li> </ul> |                                                                                                                                                |
| (Level of) limited access (highway) <ul style="list-style-type: none"> <li>• Full/partial/modified control limited access highway</li> </ul>                                   | Managed access highway class <ul style="list-style-type: none"> <li>• Class (1-5) managed access highway</li> </ul>                            |
| Type (A, B, C, D, F) approach<br>Type A approach = Type A road approach                                                                                                        | Category (I-IV) access connection                                                                                                              |
| Allowed (policy)                                                                                                                                                               | Permitted (a document) or allowed (policy)                                                                                                     |
|                                                                                                                                                                                | Conforming access connection permit (among others)                                                                                             |
| Terms Not Used in Chapter 530                                                                                                                                                  | Terms Not Used in Chapter 540                                                                                                                  |
| class                                                                                                                                                                          | classification (except functional)                                                                                                             |
| category                                                                                                                                                                       | type                                                                                                                                           |
| connection                                                                                                                                                                     | approach                                                                                                                                       |
| permit or permitted                                                                                                                                                            |                                                                                                                                                |

**Access Control Vocabulary**  
Exhibit 520-1

Pages 3.6-31 thru 3-6.37, Traffic Operations Mitigation Measures: This section outlines possible projects and actions which could help to mitigate expected transportation impacts from SKIA development. Per [WAC 365-196-735](#), a jurisdiction's plans and planning policies are required to be consistent with both regional and state plans. To assist Bremerton in this effort, a list of projects is being provided. These are projects in the Bremerton area which are identified in current regional and state transportation plans: the state [Highway System Plan](#) (HSP) and the Regional Transportation Plan (RTP), [Transportation 2040](#).

**The HSP** lists mobility recommendations that are categorized into three tiers, as follows:

- Tier I: System Operation. These projects consist of lower cost projects, shorter delivery schedules, and system-wide implementation applications. Examples include intelligent transportation systems (ITS), access management projects, ramp modifications, turn lanes and intersection improvements.
- Tier II: System Efficiency. These projects build upon Tier I improvements and promote optimization of traffic operation systems. They include operational improvements such as ramp metering, turn lanes, adjusting the timing of signals, adding auxiliary lanes, improving a parallel corridor, or ITS.
- Tier III: System Expansion. These projects build upon the previous two tiers and tend to be higher cost projects with corridor-wide benefits. They may include adding general purpose or high occupancy vehicle or toll (HOV or HOT) lanes, passenger rail, transit, multi-modal facilities, or major interchange improvements.

Tier I projects are typically smaller and involve limited construction activities. The quick implementation and lower cost increase their likelihood of being funded. Tier III projects are categorized as such primarily due to their anticipated higher cost, degree of construction difficulty, and time required to design and build. These projects require state or federal highway funding because their expense is above what local jurisdictions and agencies can afford. The legislature is the funding authority for all Tier III projects. The HSP was last updated in 2007 and is currently being revised.

**RTP projects** are categorized as either constrained or unconstrained. Constrained projects are part of planned transportation improvements and were coordinated with a specific anticipated funding level. They therefore have a higher potential to be funded by the legislature than unconstrained projects, which do not have a specific funding strategy.

The following excerpt of projects is provided for your convenience; please consult the source documents for complete accuracy and more detail. Dates, when given, are the estimated year of completion.

### SR 3

- Widening to four lanes from Lake Flora Road to Imperial Way (2040, unconstrained Tier III)
- Widening to four lanes from Imperial Way to Sunnyslope Road (2040, constrained Tier III)
- Widening to four lanes from Sunnyslope Road to SR 16 eastbound (2040, constrained Tier III)
- Widening to four lanes plus two HOV lanes, SR 16 to SR 304 (2040, constrained Tier III)

- Widening to four lanes plus two HOV lanes, SR 304 to Loxie Eagans Blvd (2040, constrained Tiers II & III)
- Install ITS along segment from SR 16 spur to SR 104 (Tier I)
- SR 16 interchange improvements (2020-2040, constrained Tier III)
- SR 304 interchange improvements (2020-2040, constrained Tiers II & III)
- Intersection improvements at Imperial Way (Tier II)
- Intersection improvements at Sunnyslope Road (Tier II)
- Intersection improvements at Sam Christopherson Ave W (2020, constrained Tier II)

**SR 16**

- Widen to add HOV lanes from SR 160 to SR 166/Gorst (2040, unconstrained Tier III)
- Convert two general purpose lanes to HOV from SR 166 to SR 3 (2040, unconstrained Tier I)
- SR 160 Interchange improvements (Tier III)
- Tremont Street interchange improvements (Tier III)
- Gorst area improvements (Tier III): Widen to add HOV lanes, grade separate Sam Christopherson Road/SR 3 intersection, and widen SR 3 and SR 16 ramps to accommodate future traffic flows

**SR 303**

- Widen to add business access and transit (BAT) lanes, 11<sup>th</sup> St to Fairgrounds Road (2040, constrained Tier III)
- Install ITS and improve intersections along segment from SR 304 to Brownsville Highway/Clear Creek Road (Tier I)
- Access management and intersection improvements at Riddle Road (Tier II)

In addition to the above projects listed in the HSP and RTP, the following projects are funded, and several are currently under construction:

- SR 3: Lake Flora Road to south of Imperial Way - Safety Improvements. Install right turn lane, lengthen center lane, and widen intersection. The project will install a northbound "off-set" right turn lane (separated from the through-lane by more than just a stripe) to Lake Flora Road, construct a center acceleration lane, widen SR 3 in the vicinity of the intersection, and install centerline rumble strips. The design is still under development and may possibly include rumble strips on the shoulders as well. Anticipated construction complete: 2014.
- SR 3: Belfair Bypass - New Alignment. Construct new alignment around the town of Belfair, connecting to Lake Flora Road on the north end. Existing funding will complete the environmental process, identify all right of way required, and complete design including contract plans; it does not include construction. Anticipated environmental analysis complete: 2025.
- SR 3: Belfair Area - Widening and Safety Improvements. Phase 1 of this project includes widening for a two-way left turn lane and sidewalks from Sweetwater Creek to north of Romance Hill Road (milepost 25.36-26.13), and then sidewalks only up to Ultimate (mp 26.13-27.08). Other improvements may include pedestrian and bicycle facilities, storm sewer improvements, and other

mitigation requirements. Based on current cost estimates and available funding, this project will be staged. Stage 1 is fully funded; Stage 2, from SR 106 to Sweetwater Creek (milepost 24.91-25.36) is not funded. Anticipated construction complete for Stage 1: 2014.

- SR 3: Sam Christopherson Ave W to SR 304 - Paving. Anticipated construction complete: 2012.
- SR 303: Manette Bridge Bremerton Vicinity - Replace bridge with new structure. Anticipated construction complete: 2012.
- SR 303: Port Washington Narrows Bridge - Upgrade Bridge Rail. Anticipated construction complete: 2011.
- SR 304: Various ferry terminal improvements, including wingwall replacement, seismic retrofits, and security infrastructure. Ongoing through 2017.

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cont.

## Appendix 3

# Appendix: Greenhouse Gas Assumptions

| GHG Reduction Strategy                                   | Key Source                                                                                                                                                                                                                                                                                                                                                                                                                       | Alt 2 Reduction | Alt 3 Reduction | Assumptions                                                                                                                                                                                                                                                              |
|----------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Green Building Standards                                 | Newsham, et. al. ( <a href="http://www.nrc-cnrc.gc.ca/obj/irc/doc/pubs/nrcc51142.pdf">http://www.nrc-cnrc.gc.ca/obj/irc/doc/pubs/nrcc51142.pdf</a> )                                                                                                                                                                                                                                                                             | 912,695         | 1,597,986       | Assumes that new construction meets LEED Silver or better goals related to energy consumption. This translates into a 25 percent reduction in building energy use.                                                                                                       |
| Forest Retention (25 percent of site retained as forest) | CAPCOA - Quantifying GHG Mitigation Measures ( <a href="http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf">http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf</a> )                                                                                                                                                                         | 1,887,000       | 1,887,000       | 111 MT CO2 sequestered per year per acre for forest land. Assume 850 acres retained as forest land and carbon is absorbed for 20 year period.                                                                                                                            |
| 25% Local Electricity Generation (renewable)             | Department of Energy ( <a href="http://buildingsdatabook.eren.doe.gov/TableView.aspx?table=3.1.5">http://buildingsdatabook.eren.doe.gov/TableView.aspx?table=3.1.5</a> ); Puget Sound Energy ( <a href="http://www.pse.com/energyEnvironment/energysupply/Pages/EnergySupply-Electricity-PowerSupplyProfile.aspx">http://www.pse.com/energyEnvironment/energysupply/Pages/EnergySupply-Electricity-PowerSupplyProfile.aspx</a> ) | 305,570         | 535,006         | Assumes 54 percent of energy use is electricity, and that 62 percent of electricity use has a carbon emissions.                                                                                                                                                          |
| Mandatory Commute Trip Reduction Program                 | CAPCOA - Quantifying GHG Mitigation Measures; Puget Sound Regional Travel Model Output                                                                                                                                                                                                                                                                                                                                           | 78,078          | 168,355         | Assumes 25 percent of trips are commute trips for Alt 2 and 45 percent for Alt 3 (based on PSRC model output). Based on CAPCOA - a 5.3 percent reduction in commute VMT.                                                                                                 |
| Expanded Vanpool and Transit Services                    | CAPCOA - Quantifying GHG Mitigation Measures; Puget Sound Regional Travel Model Output                                                                                                                                                                                                                                                                                                                                           | 60,060          | 129,504         | Assumes 25 percent of trips are commute trips for Alt 2 and 45 percent for Alt 3 (based on PSRC model output). Based on CAPCOA - a 4 percent reduction in commute VMT.                                                                                                   |
| Additional Housing Options Near SKIA (see note)          | Fehr & Peers; Puget Sound Regional Travel Model Output                                                                                                                                                                                                                                                                                                                                                                           | 249,849         | 299,297         | Assumes 25 percent of trips are commute trips for Alt 2 and 45 percent for Alt 3 (based on PSRC model output). Based on PSRC data, the average Bremerton area household commute trip length is 26 percent shorter than the average SKIA worker under existing conditions |
| Efficient Transportation Design (see note)               | Fehr & Peers                                                                                                                                                                                                                                                                                                                                                                                                                     | 3,000           | 3,000           | Assumes a .1 MPG improvement in fuel economy.                                                                                                                                                                                                                            |
| Develop Support Retail and Services on Site              | Fehr & Peers; Puget Sound Regional Travel Model Output                                                                                                                                                                                                                                                                                                                                                                           | 39,039          | 46,765          | Assumes that 25 percent of non-home based trips are one mile long                                                                                                                                                                                                        |
| Encourage Locally Serving Industries                     | Fehr & Peers; Puget Sound Regional Travel Model Output                                                                                                                                                                                                                                                                                                                                                                           | 19,519          | 23,383          | Assumes that 10 percent of shipping trips are half as long                                                                                                                                                                                                               |
| Energy Efficient Outdoor Lighting                        | CAPCOA                                                                                                                                                                                                                                                                                                                                                                                                                           | 73,016          | 127,839         | LED outdoor lighting can save 40% GHG emissions compared to other types. Assume that 5% of energy use devoted to outdoor lighting.                                                                                                                                       |
| Combined Reduction                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                  | 3,624,826       | 4,815,133       |                                                                                                                                                                                                                                                                          |
| Percent Reduction                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                  | 35.5%           | 33.8%           |                                                                                                                                                                                                                                                                          |

## Alternative 1 GHG Emissions Calculations

Carbon dioxide emissions factor per gallon of gasoline consumed (a) = 8.8 kilograms

Adjustment factor to account for other greenhouse gasses (a) = 1.052631579

(a) Source: US EPA, <http://www.epa.gov/otaq/climate/420f05004.pdf>

Combined average fuel economy of cars and light trucks (b) = 22.4 miles per gallon

(b) Source: 2006 data from the Bureau of Transportation Statistics, [http://www.bts.gov/publications/national\\_transportation\\_statistics/html/table\\_04\\_23.html](http://www.bts.gov/publications/national_transportation_statistics/html/table_04_23.html)

**GHG emissions per average weekday from project/plan = 40.22 metric tons of carbon dioxide equivalent (c) per day**

(c) Note that carbon dioxide equivalent is a term to consolidate all GHG emissions into a single unit of analysis.

Years of Service Expected from King County Spreadsheet 62.5

Annual GHG Emissions 14,158 metric tons CO<sub>2</sub>e

|                                       |         |
|---------------------------------------|---------|
| Lifetime Transportation GHG Emissions | 884,854 |
|---------------------------------------|---------|

Annual Tonnes per Service Population 14.0452999

| Airport GHG Emissions | Gallons |          |
|-----------------------|---------|----------|
| Gasoline              | 381970  | 3177.99  |
| Jet Fuel              | 137620  | 1317.023 |
|                       |         | 4719.764 |

Assuming 62.5 years of service at the airport at its current operating level 294985.3 Lifetime CO<sub>2</sub>e emissions

**SKIA Alternative 1 Building and Energy GHG Emissions**

|                                                          |         |                                                 | Emissions <b>Per Unit</b> or <b>Per Thousand Square Feet</b><br>(MTCO2e) |        |                |          |         |
|----------------------------------------------------------|---------|-------------------------------------------------|--------------------------------------------------------------------------|--------|----------------|----------|---------|
| Type (Residential) or Principal Activity<br>(Commercial) | # Units | Square Feet (in<br>thousands of<br>square feet) | Embodied                                                                 | Energy | Transportation | Embodied | Energy  |
| Single-Family Home.....                                  | 0       |                                                 | 98                                                                       | 672    | 792            | 0        | 0       |
| Multi-Family Unit in Large Building .....                | 0       |                                                 | 33                                                                       | 357    | 766            | 0        | 0       |
| Multi-Family Unit in Small Building .....                | 0       |                                                 | 54                                                                       | 681    | 766            | 0        | 0       |
| Mobile Home.....                                         | 0       |                                                 | 41                                                                       | 475    | 709            | 0        | 0       |
| Education .....                                          |         | 0.0                                             | 39                                                                       | 646    | 361            | 0        | 0       |
| Food Sales .....                                         |         | 0.0                                             | 39                                                                       | 1,541  | 282            | 0        | 0       |
| Food Service .....                                       |         | 0.0                                             | 39                                                                       | 1,994  | 561            | 0        | 0       |
| Health Care Inpatient .....                              |         | 0.0                                             | 39                                                                       | 1,938  | 582            | 0        | 0       |
| Health Care Outpatient .....                             |         | 0.0                                             | 39                                                                       | 737    | 571            | 0        | 0       |
| Lodging .....                                            |         | 0.0                                             | 39                                                                       | 777    | 117            | 0        | 0       |
| Retail (Other Than Mall).....                            |         | 0.0                                             | 39                                                                       | 577    | 247            | 0        | 0       |
| Office .....                                             |         | 0.0                                             | 39                                                                       | 723    | 588            | 0        | 0       |
| Public Assembly .....                                    |         | 0.0                                             | 39                                                                       | 733    | 150            | 0        | 0       |
| Public Order and Safety .....                            |         | 0.0                                             | 39                                                                       | 899    | 374            | 0        | 0       |
| Religious Worship .....                                  |         | 0.0                                             | 39                                                                       | 339    | 129            | 0        | 0       |
| Service .....                                            |         | 0.0                                             | 39                                                                       | 599    | 266            | 0        | 0       |
| Warehouse and Storage .....                              |         | 0.0                                             | 39                                                                       | 352    | 181            | 0        | 0       |
| Other .....                                              |         | 700.0                                           | 39                                                                       | 1,278  | 257            | 27,101   | 894,872 |
| Vacant .....                                             |         | 0.0                                             | 39                                                                       | 162    | 47             | 0        | 0       |
|                                                          |         |                                                 |                                                                          |        |                | 35,151   | 894,872 |

**Section II: Pavement.....**

|               |  |        |  |  |  |      |
|---------------|--|--------|--|--|--|------|
| Pavement..... |  | 161.00 |  |  |  | 8050 |
|---------------|--|--------|--|--|--|------|

## Alternative 2 GHG Emissions Calculations

Carbon dioxide emissions factor per gallon of gasoline consumed (a) = 8.8 kilograms

Adjustment factor to account for other greenhouse gasses (a) = 1.052631579

(a) Source: US EPA, <http://www.epa.gov/otaq/climate/420f05004.pdf>

Combined average fuel economy of cars and light trucks (b) = 22.4 miles per gallon

(b) Source: 2006 data from the Bureau of Transportation Statistics,  
[http://www.bts.gov/publications/national\\_transportation\\_statistics/html/table\\_04\\_23.html](http://www.bts.gov/publications/national_transportation_statistics/html/table_04_23.html)

**GHG emissions per average weekday from project/plan = 273.00 metric tons of carbon dioxide equivalent (c) per day**

(c) Note that carbon dioxide equivalent is a term to consolidate all GHG emissions into a single unit of analysis.

Years of Service Expected from King County Spreadsheet 62.5

Annual GHG Emissions 96,096 metric tons CO<sub>2</sub>e

**Lifetime Transportation GHG Emissions 6,005,997**

Annual Tonnes per Service Population 95.33328765

Airport Emissions

Gallons

Gasoline

381970 3177.99

Jet Fuel

137620 1317.023

4719.764

Assuming 62.5 years of service at the airport at its current operating level

294985.3 Lifetime CO<sub>2</sub>e emissions

**SKIA Alternative 2 Building and Energy GHG Emissions**

| Type (Residential) or Principal Activity<br>(Commercial) | # Units | Square Feet (in<br>thousands of<br>square feet) | Emissions <b>Per Unit</b> or <b>Per Thousand Square Feet</b><br>(MTCO2e) |        |                | Embodied | Energy    |
|----------------------------------------------------------|---------|-------------------------------------------------|--------------------------------------------------------------------------|--------|----------------|----------|-----------|
|                                                          |         |                                                 | Embodied                                                                 | Energy | Transportation |          |           |
| Single-Family Home.....                                  | 0       |                                                 | 98                                                                       | 672    | 792            | 0        | 0         |
| Multi-Family Unit in Large Building .....                | 0       |                                                 | 33                                                                       | 357    | 766            | 0        | 0         |
| Multi-Family Unit in Small Building .....                | 0       |                                                 | 54                                                                       | 681    | 766            | 0        | 0         |
| Mobile Home.....                                         | 0       |                                                 | 41                                                                       | 475    | 709            | 0        | 0         |
| Education .....                                          |         | 0.0                                             | 39                                                                       | 646    | 361            | 0        | 0         |
| Food Sales .....                                         |         | 0.0                                             | 39                                                                       | 1,541  | 282            | 0        | 0         |
| Food Service .....                                       |         | 0.0                                             | 39                                                                       | 1,994  | 561            | 0        | 0         |
| Health Care Inpatient .....                              |         | 0.0                                             | 39                                                                       | 1,938  | 582            | 0        | 0         |
| Health Care Outpatient .....                             |         | 0.0                                             | 39                                                                       | 737    | 571            | 0        | 0         |
| Lodging .....                                            |         | 0.0                                             | 39                                                                       | 777    | 117            | 0        | 0         |
| Retail (Other Than Mall).....                            |         | 600.0                                           | 39                                                                       | 577    | 247            | 23,229   | 346,351   |
| Office .....                                             |         | 150.0                                           | 39                                                                       | 723    | 588            | 5,807    | 108,456   |
| Public Assembly .....                                    |         | 0.0                                             | 39                                                                       | 733    | 150            | 0        | 0         |
| Public Order and Safety .....                            |         | 0.0                                             | 39                                                                       | 899    | 374            | 0        | 0         |
| Religious Worship .....                                  |         | 0.0                                             | 39                                                                       | 339    | 129            | 0        | 0         |
| Service .....                                            |         | 0.0                                             | 39                                                                       | 599    | 266            | 0        | 0         |
| Warehouse and Storage .....                              |         | 0.0                                             | 39                                                                       | 352    | 181            | 0        | 0         |
| Other .....                                              |         | 2,500.0                                         | 39                                                                       | 1,278  | 257            | 96,789   | 3,195,971 |
| Vacant .....                                             |         | 0.0                                             | 39                                                                       | 162    | 47             | 0        | 0         |
| <b>Section II: Pavement.....</b>                         |         |                                                 |                                                                          |        |                | 268,176  | 3,650,778 |
| Pavement.....                                            |         | 2,847.00                                        |                                                                          |        |                |          |           |

## Alternative 3 GHG Emissions Calculations

Carbon dioxide emissions factor per gallon of gasoline consumed (a) = 8.8 kilograms

Adjustment factor to account for other greenhouse gasses (a) = 1.052631579

(a) Source: US EPA, <http://www.epa.gov/otaq/climate/420f05004.pdf>

Combined average fuel economy of cars and light trucks (b) = 22.4 miles per gallon

(b) Source: 2006 data from the Bureau of Transportation Statistics,  
[http://www.bts.gov/publications/national\\_transportation\\_statistics/html/table\\_04\\_23.html](http://www.bts.gov/publications/national_transportation_statistics/html/table_04_23.html)

**GHG emissions per average weekday from project/plan = 327.03 metric tons of carbon dioxide equivalent (c) per day**

(c) Note that carbon dioxide equivalent is a term to consolidate all GHG emissions into a single unit of analysis.

Years of Service Expected from King County Spreadsheet 62.5

Annual GHG Emissions 115,114 metric tons CO<sub>2</sub>e

**Lifetime Transportation GHG Emissions 7,194,642**

Annual Tonnes per Service Population 114.2006636

| Airport GHG Emissions | Gallons         |
|-----------------------|-----------------|
| Gasoline              | 381970 3177.99  |
| Jet Fuel              | 137620 1317.023 |
|                       | 4719.764        |

Assuming 62.5 years of service at the airport at its current operating level 294985.3 Lifetime CO<sub>2</sub>e emissions

**SKIA Alternative 3 Building and Energy GHG Emissions**

| Type (Residential) or Principal Activity<br>(Commercial) | # Units | Square Feet (in<br>thousands of<br>square feet) | Emissions <b>Per Unit</b> or <b>Per Thousand Square Feet</b><br>(MTCO2e) |        |                | Embodied | Energy    |
|----------------------------------------------------------|---------|-------------------------------------------------|--------------------------------------------------------------------------|--------|----------------|----------|-----------|
|                                                          |         |                                                 | Embodied                                                                 | Energy | Transportation |          |           |
| Single-Family Home.....                                  | 0       |                                                 | 98                                                                       | 672    | 792            | 0        | 0         |
| Multi-Family Unit in Large Building .....                | 0       |                                                 | 33                                                                       | 357    | 766            | 0        | 0         |
| Multi-Family Unit in Small Building .....                | 0       |                                                 | 54                                                                       | 681    | 766            | 0        | 0         |
| Mobile Home.....                                         | 0       |                                                 | 41                                                                       | 475    | 709            | 0        | 0         |
| Education .....                                          |         | 0.0                                             | 39                                                                       | 646    | 361            | 0        | 0         |
| Food Sales .....                                         |         | 0.0                                             | 39                                                                       | 1,541  | 282            | 0        | 0         |
| Food Service .....                                       |         | 0.0                                             | 39                                                                       | 1,994  | 561            | 0        | 0         |
| Health Care Inpatient .....                              |         | 0.0                                             | 39                                                                       | 1,938  | 582            | 0        | 0         |
| Health Care Outpatient .....                             |         | 0.0                                             | 39                                                                       | 737    | 571            | 0        | 0         |
| Lodging .....                                            |         | 0.0                                             | 39                                                                       | 777    | 117            | 0        | 0         |
| Retail (Other Than Mall).....                            |         | 0.0                                             | 39                                                                       | 577    | 247            | 0        | 0         |
| Office .....                                             |         | 0.0                                             | 39                                                                       | 723    | 588            | 0        | 0         |
| Public Assembly .....                                    |         | 0.0                                             | 39                                                                       | 733    | 150            | 0        | 0         |
| Public Order and Safety .....                            |         | 0.0                                             | 39                                                                       | 899    | 374            | 0        | 0         |
| Religious Worship .....                                  |         | 0.0                                             | 39                                                                       | 339    | 129            | 0        | 0         |
| Service .....                                            |         | 0.0                                             | 39                                                                       | 599    | 266            | 0        | 0         |
| Warehouse and Storage .....                              |         | 0.0                                             | 39                                                                       | 352    | 181            | 0        | 0         |
| Other .....                                              |         | 5,000.0                                         | 39                                                                       | 1,278  | 257            | 193,578  | 6,391,942 |
| Vacant .....                                             |         | 0.0                                             | 39                                                                       | 162    | 47             | 0        | 0         |
|                                                          |         |                                                 |                                                                          |        |                | 371,278  | 6,391,942 |

**Section II: Pavement.....**

|               |  |          |  |  |  |               |
|---------------|--|----------|--|--|--|---------------|
| Pavement..... |  | 3,554.00 |  |  |  | <b>177700</b> |
|---------------|--|----------|--|--|--|---------------|