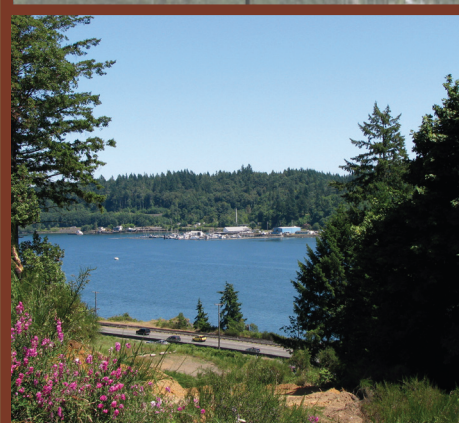




CITY OF BREMERTON

GORST CREEK WATERSHED PLAN Land Use, Environmental & Infrastructure Analysis October 2012



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GORST CREEK WATERSHED PLAN

LAND USE, ENVIRONMENTAL & INFRASTRUCTURE ANALYSIS

October 2012

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1.0 INTRODUCTION

The Gorst Creek Watershed feeds the headwaters of Sinclair Inlet in the Puget Sound. While the overall watershed is largely undeveloped and forested, existing development is concentrated in the downstream areas around the mouth of Gorst Creek and along the shoreline of Sinclair Inlet. The Gorst Creek estuary is a major passageway and nursery for Puget Sound Chinook, Coho, and Chum salmon, along with Steelhead, and Sea-Run Cutthroat trout. The Suquamish Tribe co-manages a hatchery on Gorst Creek and takes an active role in managing the natural resources within the watershed.

Having sub-optimal land use and environmental regulations for decades, development along the Sinclair Inlet shoreline has occurred haphazardly, and commercial and industrial activities maximized impervious pavement on their properties. This results in pollutant runoff directly into adjacent receiving waters.

Sewers were recently installed to address water quality concerns associated with fecal coliform. Sewers are also anticipated to make the developed land in the Gorst Urban Growth Area (UGA) more viable for redevelopment. Likewise, heavy traffic on State Routes 3 and 16 impacts the natural and built environment, but also may be attractive for future commercial development, with high volumes of traffic creating an economically desirable location.

Absent a science-based land use plan and associated low-impact development (LID) code requirements, current development could continue, creating negative impacts on water quality. Future development could result in loss of native vegetation and alter uplands important for water processes and habitat functions that are not fully protected under current critical area regulations.

The purpose of the Gorst Creek Watershed planning effort is to:

1. Evaluate and classify existing watershed characteristics and habitat in the Gorst Creek Watershed;
2. Develop a watershed plan, including a subarea plan for the Gorst Urban Growth Area (UGA), and prepare implementing regulations to protect the intact ecosystem processes, structures and functions; and
3. Create a Capital Facilities Plan (CFP) to correct existing deficiencies.

This Land Use, Environmental, and Infrastructure Analysis is intended to relate the watershed characterization results (Step 1) to planning recommendations (the beginning of Step 2). In addition, this analysis can assist in the formation of land use alternatives to be scoped with the public and evaluated in an environmental impact statement (EIS). Land use alternatives would also serve as the basis for the Watershed Comprehensive Plan and implementing regulations. This analysis presents the following topics, for both the watershed as a whole and for the Gorst UGA:

- **Watershed Characterization Findings:** Summarizes key findings of the *Gorst Creek Watershed Characterization Report* (City of Bremerton, May 2012). The watershed characterization identifies areas of development, restoration and protection that will guide land use and zoning designations and implementing regulations;
- **Infrastructure Conditions:** Summarizes infrastructure conditions based on the *Gorst Creek Watershed Inventory and Characterization Technical Memorandum* (Parametrix, August 4, 2011), and based on Kitsap County's *2013-2025 Capital Facilities Plan* (Kitsap County, August 2012). Infrastructure conditions can also help identify suitable areas of development or where added capital investment is needed;
- **UGA Boundaries and Potential Development Areas:** Describes UGA boundaries in relationship to watershed subareas determined suitable for development. A comparison of UGA boundaries to the

watershed characterization results can help shape UGA land use and zoning designations and future areas for UGA boundary changes if appropriate;

- **Zoning and Land Capacity Analysis:** Provides a land capacity analysis for the Gorst UGA using Kitsap County and City of Bremerton methods. The land capacity analysis can estimate future growth and guide future land use alternatives;
- **Potential Land Use Strategies and Performance Standards:** Recommendations for land use strategies and conceptual permit pathways and performance standards. These standards can vary for different areas of the watershed and can be tested in future land use alternatives;
- **A “SWOT” Assessment and Guiding Principles.** Considers the strengths, weaknesses, opportunities, and threats (SWOTs) in the Gorst Watershed for the economy, environment, land use, transportation, and other infrastructure. Based on the SWOT assessment, preliminary guiding principles are considered. These guiding principles will be tested through a public outreach and planning process;
- **A Gorst Creek Watershed Plan Outline.** Provides a preliminary outline of a watershed plan. The preliminary outline is an early concept of topics to be addressed in the plan, and is subject to change as a result of agency and public outreach and the needs of the City and County; and
- **Next Steps.** Summarizes the upcoming public and agency outreach efforts to develop the Gorst Creek Watershed Plan.

As shown above, the analysis progresses from environmental and infrastructure conditions to preliminary land use analysis and recommendations that can be carried forward in the planning process.

2.0 STUDY AREA

The Gorst Creek Watershed and Gorst UGA together comprise the study area for this analysis, and encompass over 6,000 acres in the southwestern portion of Kitsap County. See Exhibit 1.

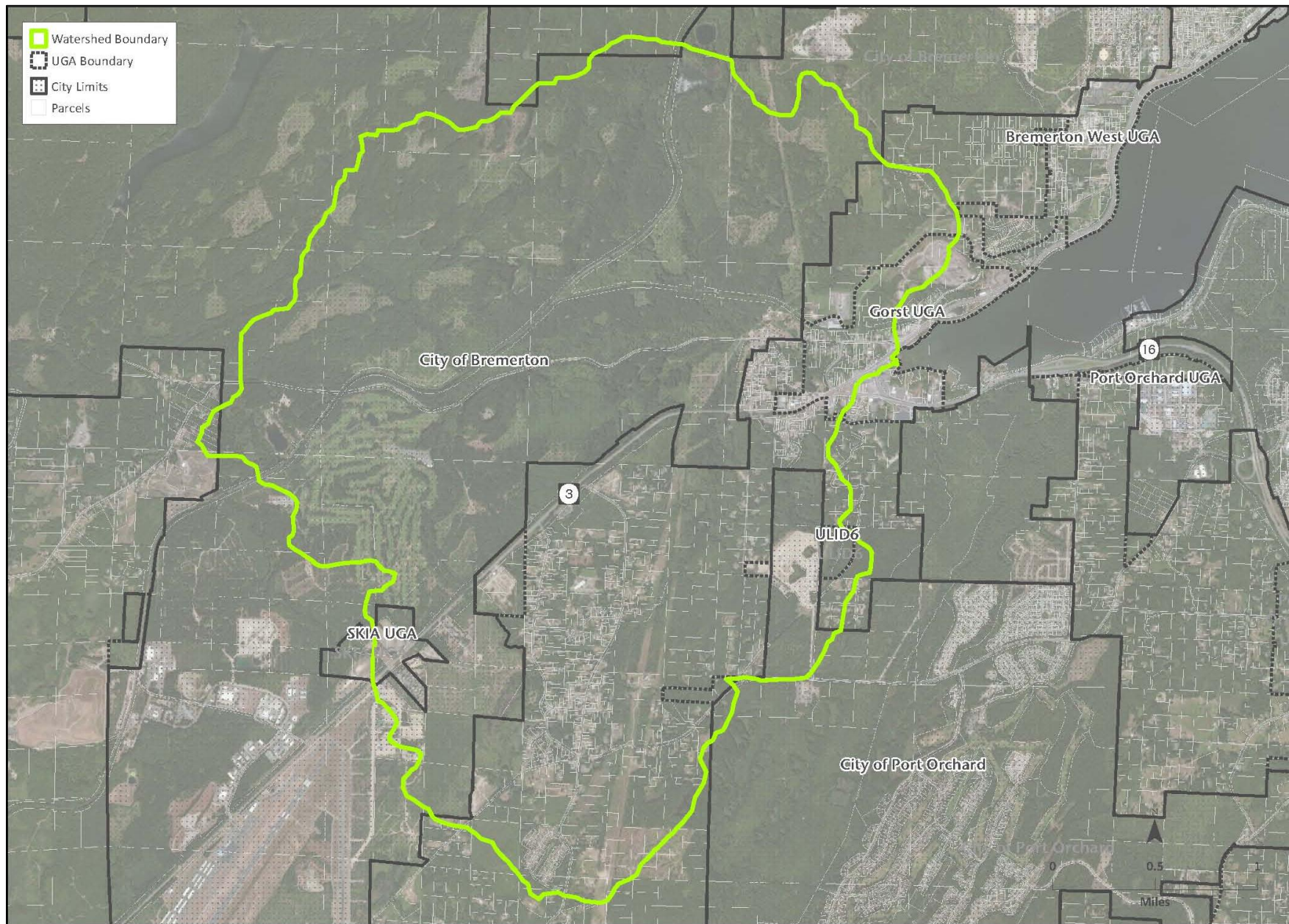
The conditions in the upper Gorst Creek Watershed are largely undeveloped, with low levels of impervious surfaces, and wetland complexes in the headwaters that provide moderate to high functions, including floodwater retention, water quality, and habitat functions. Gorst Creek drains into Sinclair Inlet. At the mouth of Gorst Creek is an estuary that has been degraded by shoreline armoring, fill, removal of shoreline vegetation, and the poor water quality of Gorst Creek.

Several jurisdictional boundaries cross into the watershed:

- About 3,597 acres encompass Bremerton city limits of which 2,744 acres are City Utility (forested) lands and 103 acres are in the South Kitsap Industrial Area (SKIA).
- About 174 acres of the watershed are in the unincorporated Gorst UGA, and the rest of the Gorst UGA outside of the watershed includes 162 acres (total 335 gross acres for the entire Gorst UGA).¹
- Approximately 178 acres are in the McCormick Woods area of the City of Port Orchard.
- Last, the balance of about 1,941 acres are Rural unincorporated land.

¹ Kitsap County’s estimate of the total UGA area is 281 acres; this may represent parcel acreage. The area calculated for this analysis shows 335 gross acres including rights of way, and will be confirmed in future planning analysis.

Exhibit 1 Gorst Creek Watershed Aerial



Source: Parametrix, Washington State Department of Ecology, Kitsap County, BERK 2012

3.0 WATERSHED CHARACTERIZATION SUMMARY AND RECOMMENDATIONS

3.1 Overview

The Gorst Creek Watershed Characterization analyzes existing conditions of the watershed with respect to water flow and habitat. Watershed characterization, an analytical framework developed by the Washington State Department of Ecology (Ecology), provides the basis for understanding the relative value of assessment units for water flow processes, water quality, and habitat within the Gorst Creek Watershed (Puget Sound Characterization, Stanley et al, in preparation, Ecology Publication #11-06-016 April 16, 2012). Local agencies, such as the City of Bremerton and Kitsap County, are responsible for land use planning and protection within the Gorst Watershed. The intent of this report is to inform future land use development with the combined analysis provided by watershed characterization and local habitat area assessments (provided by Washington State Department of Fish and Wildlife [WDFW]).

Based on this analysis, local jurisdictions can plan to accommodate future growth in a way that preserves, protects, and restores natural systems, habitats, and species, while at the same time identifying areas that are more suitable for additional development and growth. Protecting and restoring areas that are important to maintaining water flow and habitat will save time and money for both developers and municipalities in the long-run, as fully functioning natural systems contribute significantly to reduced flooding and erosion, and support water flows and water quality important to people, wildlife, and aquatic species within the watershed. Additionally, understanding where to develop at the least environmental cost, creates certainty for both local jurisdictions seeking to accommodate growth, and for developers seeking to minimize time and costs associated with permitting development.

3.2 What the Watershed Characterization Methods Do

Watershed characterization models operate at a coarse scale and are intended to be used as decision support tools. They provide information. They prioritize areas on the landscape for restoration, protection, conservation and development. Local governments may choose to base their land use regulations on consideration of this information, in combination with more specific information. In the case of Gorst, the City of Bremerton and Kitsap County intend to use the analysis provided in this report to develop a number of zoning and development alternatives which will be further analyzed in a programmatic EIS on the Gorst Creek Watershed. (It is anticipated that alternatives will include “No Action” based on current land use plans, and two action alternatives reflecting alternative visions of the Gorst Creek Watershed, and in particular the Gorst UGA.)

3.3 What the Watershed Characterization Methods Do Not Do

The methods do not provide sufficient detail to be used to support individual restoration or protection actions. Neither do the methods provide prescriptive measures for what constitutes restoration, protection, or development. Rather, they are intended to provide high level guidance as to the type of restoration or protection action that is appropriate in a given area. General guidance as to appropriate types of actions is provided within appropriate sections of the report, but it is understood that this information will need to be supplemented with site-specific information.

3.4 Why Gorst Creek Is Important

The Gorst Creek Watershed is significant for a number of reasons:

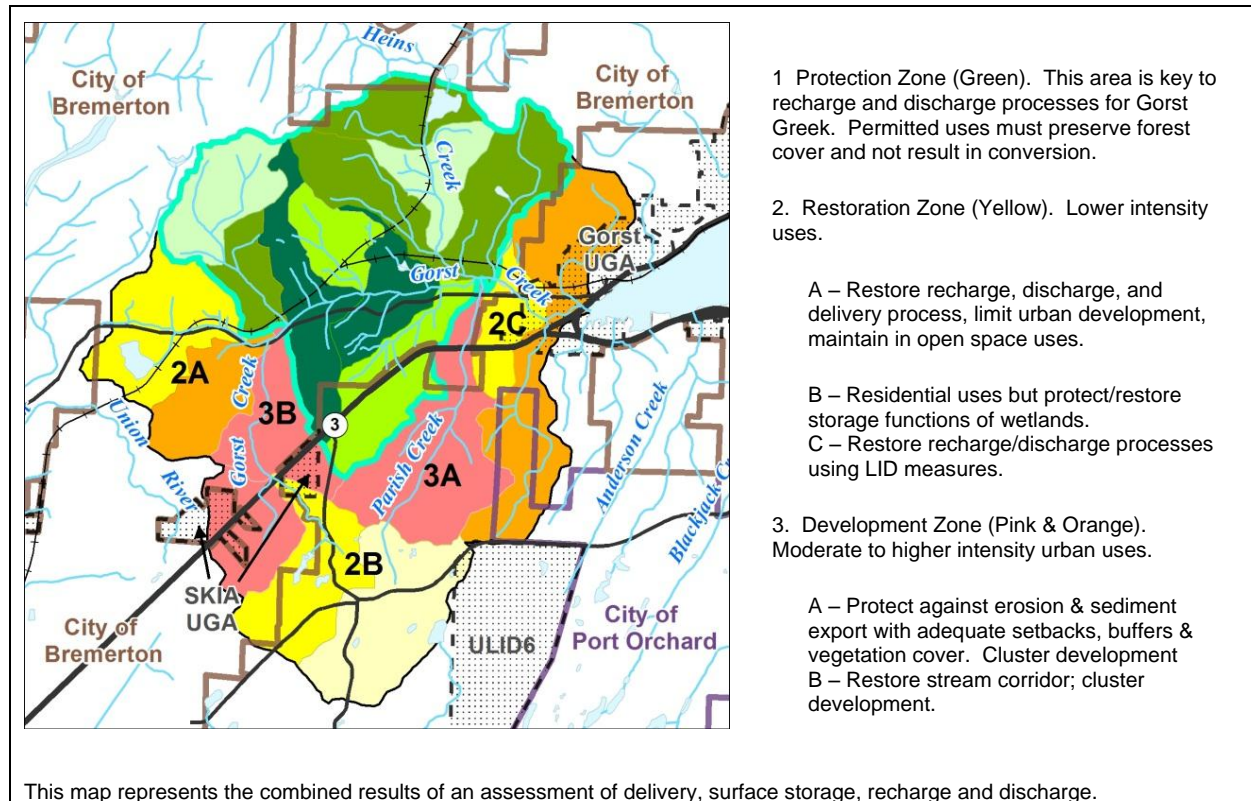
- Public ownership and management of the forest land in the central portion of the watershed has protected water flow processes, which remain in relatively good condition, with respect to other portions of the landscape.

- Gorst Creek and its tributaries, including Sinclair Inlet at the mouth of Gorst Creek, support trout and anadromous salmonids and their habitat.
- The Gorst Creek Watershed is described as “one of the largest and most productive watersheds in the east WRIA-15 subregion” in the 2003 Kitsap Salmonid Refugia Report (May and Peterson, 2003).
- Jarstad Creek has the greatest value for salmonid conservation in the watershed (May and Peterson, 2003).
- Heins Creek rated “generally good” habitat conditions (May and Peterson, 2003).
- Gorst Creek, above river mile 1.0, rated 23rd of 95 salmonid refugia areas scored within Kitsap County (May and Peterson, 2003).
- The estuary (Sinclair Inlet) supports shellfish, waterfowl, shorebirds, great blue herons, bald eagles, and is an important rearing and refuge area for juvenile Chinook salmon.
- The forested area that comprises the north and central portion of the Gorst Creek Watershed is publicly owned, and lies within a contiguous area that also contains Green Mountain and Tahuya State Forest. Taken together, this area comprises the largest open-space block in the Puget Trough Ecoregion of the Puget Sound Basin.

3.5 Water Processes Characterization

Based on assessment results for individual water flow components (delivery, storage, recharge, and discharge) and sediment process, assessment units (AUs) were grouped into patterns that identify zones for restoration, protection, and development. Exhibit 2 presents the recommended management zones.

Exhibit 2 Watershed Characterization Results: Water Processes



The **Protection Zone** supports recharge, discharge and storage processes which are critical to sustaining a natural range of flows in Gorst Creek, including adequate low flows during summer and fall. The unique properties of the Gorst Creek recessional outwash deposits are a principal factor in this high rating for hydrologic importance. Because recharge and discharge processes are sensitive to development and would be significantly degraded by impervious surfaces, buildings, roads, and drainage infrastructure, such development should be restricted in this zone.

The **Restoration Zone** primarily supports storage processes and some recharge/discharge processes. This zone may be appropriate for development, but different actions in areas A, B, and C should be subject to the following provisions.

Area 2A: This area has moderate to moderate-high importance for storage and discharge and high importance for recharge. The delivery, recharge and discharge processes are degraded. Because of its location at the headwaters of Gorst Creek and importance for recharge, low intensity uses would be appropriate. This low intensity pattern is already set with the golf course, which likely has a lower impact upon recharge processes than higher intensity urban areas. However, restoration actions to improve recharge could be investigated, including infiltration swales or galleries adjacent to the lower permeability fairways and greens. For the discharge process, restoration measures would include re-establishment of the natural hydrology of depressional and slope wetlands. Accomplishing this restoration may involve plugging ditches that either drain these wetlands or re-aligning ditches that intercept upslope water away from wetlands (e.g., roads intercepting shallow groundwater flow), thereby altering water flow processes downstream. The delivery process could be improved through the re-establishment of additional forest cover.

Area 2B: Restoration of storage processes is the highest priority for this area; recharge processes have lower importance due to the presence of till. Higher intensity development would be appropriate provided that storage processes are protected and restored. This effort would include re-establishing the natural hydrology of depressional wetlands by plugging ditches that drain them, removing fill and re-routing natural drainage patterns back into these depressional wetlands. In particular, protection and restoration of wetlands in the Parish Creek AU will protect the mid and lower portions of this watershed from erosion and sediment export.

Area 2C: Located in the lower portion of the watershed, this area is important for its recharge and discharge processes. Given that this area is already developed with urban uses, restoration may be limited to stormwater retrofit actions. However, restoration of in-stream alterations (removal of channel armoring, berms) and re-establishment of natural stream structure (i.e., reducing channelization in the lower reaches of the stream) may be appropriate given that upstream processes for the northern half of the watershed are relatively intact.

The **Development Zone** (pink and downstream orange AU adjacent to Sinclair Inlet) is suited for the highest intensity development (such as high density residential or commercial) provided appropriate measures for protecting streams, wetlands, and water quality are followed, including those for area 3A and 3B below.

Area 3A: The sediment model indicated that this AU had a high potential for export of sediment which would argue for protecting this area. However, the water-flow assessment shows this area as appropriate for higher intensity development, leading to an integrated measures that would reduce erosion and sediment export through clustering of development, adequate setbacks from steep slopes, restoration of suitable buffers, control of runoff through LID techniques and planting of cover designed to slow and infiltrate overland flows.

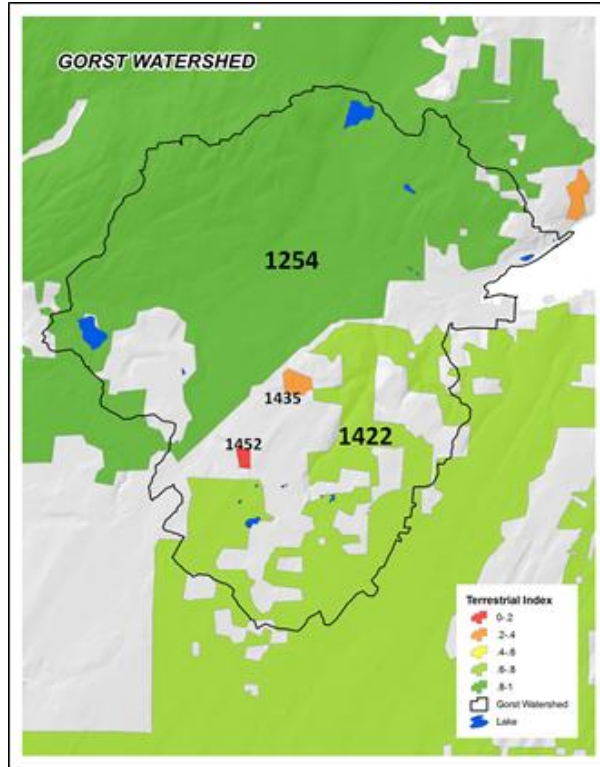
Area 3B: The sediment model indicated that this AU had a moderate potential for export of sediment. This area is shown as appropriate for higher intensity development for both the delivery, and surface storage subcomponent models for water-flow, although the corridor along Gorst Creek is shown as important for conservation for restoring and protecting surface storage, while the headwaters are shown as important for wetland restoration to protect the surface storage function. This area is capable of accepting higher intensity development provided that the stream corridors are maintained, development is clustered, and adequate setbacks from steep slopes, appropriately sized buffers, and runoff control as noted in Area 3A are followed.

3.6 Fish and Wildlife Habitat Characterization

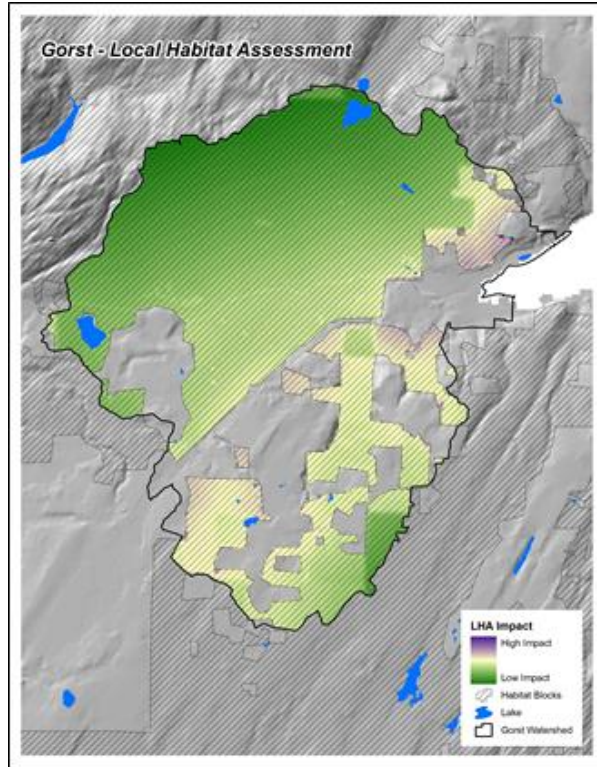
According to the WDFW assessment, the most important fish and wildlife habitats in the Gorst Creek Watershed are:

- The streams that support trout and anadromous salmonids;
- The estuary that supports waterfowl, shorebirds, great blue herons, bald eagles, juvenile salmon, and other species; and
- The large contiguous area of managed forest on the north side of the Gorst Creek Watershed that is owned and managed by the City of Bremerton.

The forest on the north side of the Gorst Creek Watershed is especially valuable for three reasons. First, it is protected in public ownership and lies in a large contiguous area of open-space that contains two other large tracts of publicly owned forest: Green Mountain and Tahuya State Forests. Relative to other open-space blocks in the Puget Trough Ecoregion, the size of this entire open-space block (106,400 acres) is exceptional—it is the largest open-space block in the Puget Trough Ecoregion of the Puget Sound Basin. For the conservation of wildlife, size matters. In fact, the area of contiguous habitat may be the single most important variable determining the long-term viability of wildlife populations (Diamond 1975; Soule and Simberloff 1986). Second, the large forested area on the north side covers roughly half of the Gorst Creek Watershed; therefore, this area has a significant beneficial effect on the freshwater habitats of trout and anadromous salmonids. And third, the beneficial effects of this forest sustain water flow and water quality processes within the watershed and contribute to the overall quality of habitats in the Gorst Creek estuary. See Exhibit 3.

Exhibit 3 Open Space Blocks and Habitat Value**Four Open-space Blocks****Overlapping the Gorst Creek Watershed**

Colors show habitat value compared to other open-space blocks in the Puget Sound Basin. Black line is watershed boundary.

**Habitat Value Within Each Open-Space Block**

Impact refers to adverse impacts from human activities. Low impact has high habitat value.

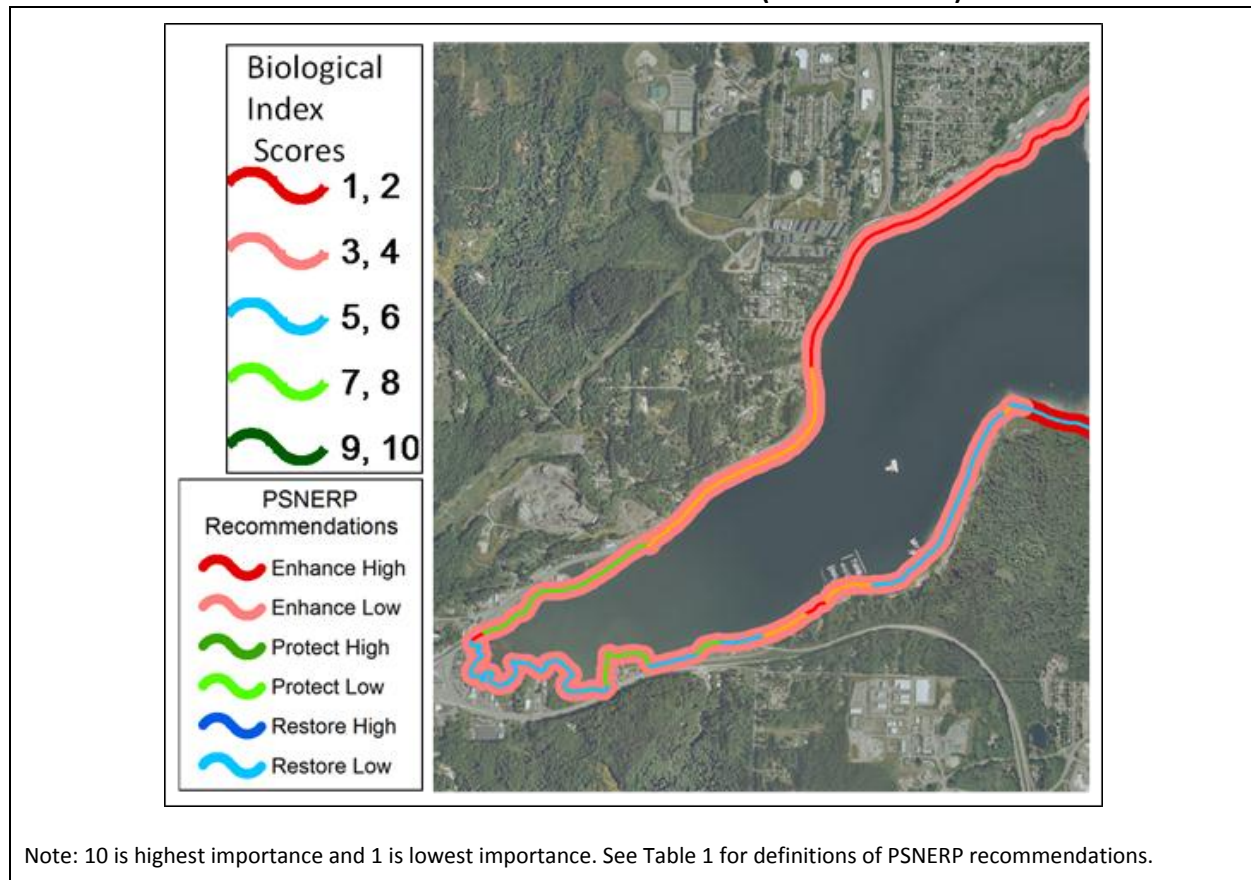
Source: Washington State Department of Fish and Wildlife in City of Bremerton et al., May 2012

The 2003 Kitsap Salmonid Refugia Report stated that without the hatchery influence, portions of the Gorst Creek Watershed would likely qualify as class B refugia. Although this class B refugia has been altered from natural conditions, at least some salmonid populations appear to be self-sustaining and resilient. Hence, the Kitsap Salmonid Refugia Report suggests that the Gorst Creek Watershed has the potential to contribute to the recovery of federally threatened Chinook and steelhead salmon. Gorst Creek may be too small for self-sustaining wild runs of Chinook or steelhead, but it could potentially support these species irregularly as a refuge. The Gorst Creek drainage was classified as a Tier 1 (high priority) watershed by the East Kitsap Peninsula Lead Entity (2004). Tier 1 is the highest priority for funding for salmon conservation and restoration through the Salmon Recovery Funding Board program. Future development in the watershed should not interfere with future efforts to restore in-channel and riparian habitats and build self-sustaining salmonid populations.

The current degraded condition of the estuary's shorelines belies the estuary's value for wildlife. Compared to other shorelines in the Central Puget Sound sub-basin, the 2 miles of marine shoreline along the Gorst Creek estuary have an average index score at the 65th percentile and portions of that shoreline scored even higher—at the 83rd percentile. The Puget Sound Nearshore Estuarine Restoration Project (PSNERP) gave their lowest recommendation for the drift cells in the estuary—"enhance low." See Exhibit 4. Shorelines given this recommendation have the lowest priority for restoration relative to other shorelines in Puget Sound. However, "enhance low" sites are places where strategic actions may enhance significant existing functions such as habitat for salmon, shellfish, and waterfowl. Although the

Gorst Creek estuary does provide some wildlife habitat, the function and extent of that habitat is likely a shadow of its historical extent (see Collins and Sheikh 2005).

Exhibit 4 Results of the Nearshore Habitat Assessment (inner line) and PSNERP's Assessment of Drift Cells (two outer lines)

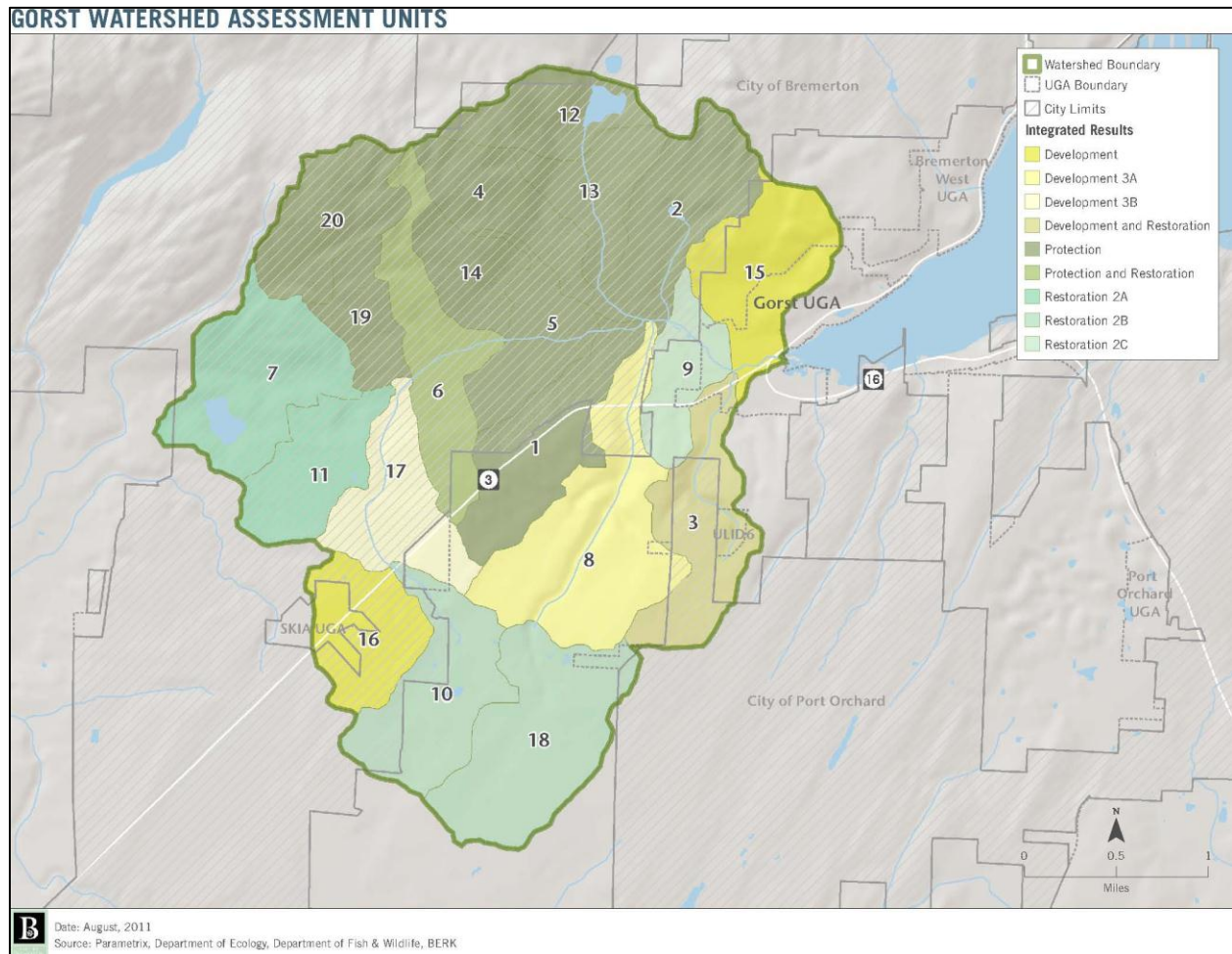


Restoration actions in the estuary could restore some wildlife habitat. Priority actions of greatest benefit to fish and wildlife should be assessed at a finer scale, looking at existing ecological processes that affect the estuary, and attempting to restore ecological structure and function at site-specific locations, given the degraded condition of the estuarine shoreline and nearshore processes overall. The *Sinclair Inlet Enhancement Opportunities* lists specific projects within the Inlet, which, if undertaken, would contribute to protecting and restoring ecosystem processes, structures, and functions of Sinclair Inlet, as well as reducing watershed pollution, and protecting and restoring sustainable fish and wildlife populations (Aquascape II) (NAVFAC Northwest 2010).

3.7 Integrated Watershed Processes and Habitat Results

Generally, the watershed characterization recommendation is to protect the north central portion of the watershed, the tributaries, and the estuary, while allowing for additional growth and development in the south, and southeastern portions of the watershed, subject to existing protection measures and best management practices. A map of integrated water processes and habitat assessments is included in Exhibit 5 below. These results provide high level guidance which will be used by the City of Bremerton and Kitsap County to inform land use development alternatives in an EIS as the City and County seek to establish the groundwork for planning for growth, while at the same time protecting and conserving the significant natural resources of the Gorst Creek Watershed.

Exhibit 5 Map of Integrated Watershed Processes and Habitat Results



Source: Parametrix, Washington State Department of Ecology, Washington State Department of Fish and Wildlife, BERK 2012

Exhibit 6 provides the more specific management measures for each AU presented above. These are considered later in Section 8 of this analysis where best management practices and permit processes are discussed.

Exhibit 6 Table of Integrated Watershed Processes and Habitat Results and Management Measures

AU No.	Integrated Results	Notes and Suggested Management Measures
1	Protection	Important area for groundwater discharge for Gorst Creek; moderate value for habitat due to rural development and roads. Despite lower habitat assessment rating, development should be minimized in this area due to its immediate impact upon groundwater discharge processes (roads, ditches, and impervious surfaces alter discharge patterns) and Gorst Creek flows.

AU No.	Integrated Results	Notes and Suggested Management Measures
2	Protection	Jarstad Creek has the highest salmon refugia score in watershed, so extra measures are needed to protect water flow processes in this AU. Due to high sediment export potential, logging activities should be limited in this AU. Maintain appropriate zoning for protection.
3	Development and Restoration	Relatively high level of degradation. Not rated by salmon refugia study. More appropriate area for moderate density development provided measures are implemented to reduce erosion and sediment export (adequate stream buffers, setbacks, reduced overland flow through infiltration and vegetation cover).
4	Protection	For headwaters AU, the processes are essentially intact, with high habitat value; given these values and high sediment export potential it is important to maintain forest cover, limit logging activities and maintain appropriate zoning for protection.
5	Protection	Area has some degradation due to roads, but has extensive slope wetlands and groundwater discharge critical to Gorst Creek. High habitat and salmon refuge value indicates that this area should be protected from further degradation. Maintain appropriate zoning for protection.
6	Protection and Restoration	Southern portion of AU has more clearing of forest and should be restored. Maintain appropriate zoning to protect this area.
7	Restoration 2A	High habitat and salmon refugia scores identify this as a higher priority area to undertake restoration actions. The golf course has degraded many of the wetlands and water courses (also on AU11); a comprehensive restoration program should be developed to restore these areas. Maintain zoning to protect open space, rural nature, and increase forest cover.
8	Development 3A	Area of low importance for water flow processes and moderate for habitat; more appropriate area for moderate to higher density development compared to other AUs within the Gorst Creek Watershed. High sediment export potential requires development measures that reduce erosions through adequate buffers and setbacks (from steep slopes) and reduction of overland flow through infiltration and plantings (LID measures). Clustering may be appropriate in this area in order to minimize potential sediment export impacts.
9	Restoration 2C	Though this area has a low score for habitat and salmon refugia, it is a higher priority for restoration due to generally intact upstream processes (northern half of watershed). Channelization, culverts, and reduced riparian cover have degraded stream corridor and discharge processes. A comprehensive program to restore creek corridor should be developed. Effective Impervious surface should be reduced through a stormwater retrofit program.
10	Restoration Area 2B	Low habitat value due to impacts from adjoining residential area but high salmon refugia score. Large area of wetlands that play an important role in regulating downstream flow. Wetlands and streams should be protected and restored, with appropriate buffers provided. This is an appropriate area for moderate density development provided clustering approach is used.
11	Restoration Area 2A	High habitat and salmon refugia scores identify this as a priority area to undertake restoration actions. The golf course has degraded many of the wetlands and water courses; a comprehensive restoration program should be developed to restore these areas. Recharge is the key process to restore. Also restore discharge and storage processes.
12	Protection	Same as No. 4 Headwaters AU: processes essentially intact, high habitat value. Maintain forest cover and protective zoning.
13	Protection	Same as No. 4 Headwaters AU: processes essentially intact, high habitat value. Maintain forest cover and protective zoning.
14	Protection	Same as No. 4 Headwaters AU: processes essentially intact, high habitat value. Maintain forest cover and protective zoning.
15	Development	Relatively high level of degradation and low habitat score; more appropriate area for higher density development provided measures are applied to reduce potential sediment export.
16	Development	The western edge of this AU is degraded by airport development. It has a moderately high score for salmon refugia, so the AU stream should be adequately protected (appropriate width buffers). More appropriate area for higher density development within the Gorst Creek Watershed, provided that streams and wetlands have adequate buffer protection.

AU No.	Integrated Results	Notes and Suggested Management Measures
17	Development Area 3B	Although the overall assessment for water flow indicated “development,” this area should receive a higher degree of protection based on moderate high habitat value. May be an appropriate area for low-to-moderate density development, provided habitat resources (forest, streams, and wetlands) are protected through use of clustering. Landfill in downstream, northern portion of AU has collapsed the culvert-carrying stream, which gives it priority for restoration.
18	Restoration Area 2B	Overall, this AU has a low-to-moderate value for water flow processes and habitat. Appropriate area for moderate density development, provided that existing streams and wetlands receive adequate protection and restoration of wetland storage functions where they have been degraded; wetlands will help control downstream erosion in AU8.
19	Protection	Same as No. 4 Headwaters AU: processes essentially intact, high habitat value. Limit forestry activities given high sediment export potential. Maintain forest cover and protective zoning.
20	Protection	Same as No. 4 Headwaters AU: processes essentially intact, high habitat value. Limit forestry activities given high sediment export potential. Maintain forest cover and protective zoning.

Source: City of Bremerton 2012

3.8 Shorelines and Critical Areas

Shorelines are special waterbodies that meet certain size or flow criteria in the Shoreline Management Act. These shorelines include the marine waters of Puget Sound as well as rivers and streams with a mean annual flow over 20 cubic feet per second (cfs). The shoreline jurisdiction extends 200 feet landward of these waters and additionally includes associated wetlands, floodways, and up to 200 feet of floodway-contiguous floodplains. In the study area, the Sinclair Inlet marine shoreline and Gorst Creek are subject to the Shoreline Management Act (RCW 90.58).

The Shoreline Management Act requires that the City of Bremerton and Kitsap County update their Shoreline Master Programs (SMPs). The SMP guidelines were last updated by Ecology in 2003 (WAC 173-26, Part III). A SMP is a set of policies and regulations required by state law that:

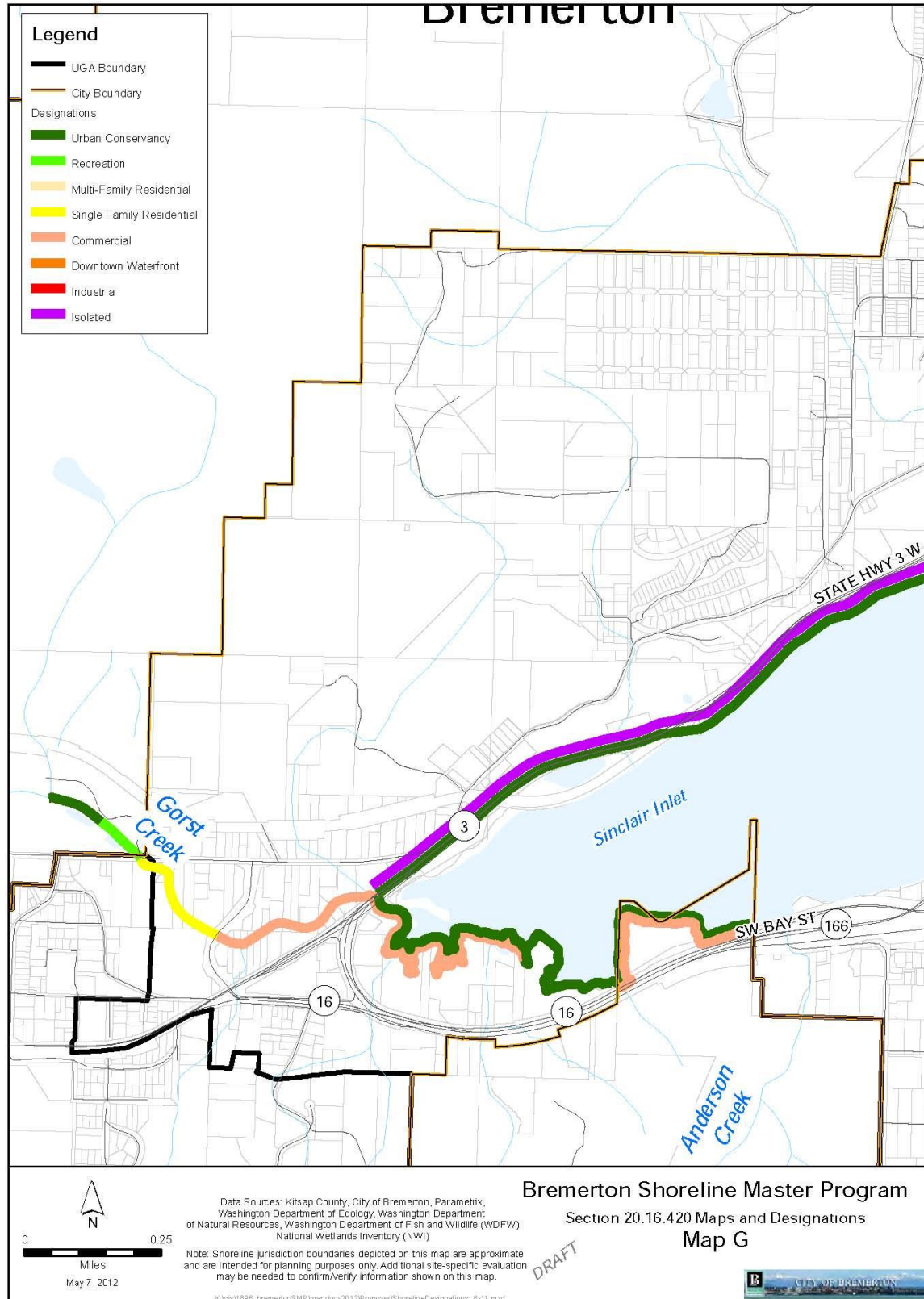
- Encourages reasonable and appropriate development of shorelines with an emphasis on water-dependent, water-related, and water-enjoyment uses, such as docks, marinas, and recreational facilities, or industries and commercial uses that require a shoreline location and support economic development, and,
- Protects the natural character of the shorelines, the land, vegetation, wildlife, and shoreline environment, and,
- Promotes public access and provides opportunities to enjoy views and recreational activities in shoreline areas.

The City and County have considered environmental conditions and appropriate upland and aquatic land uses and activities in their pending SMP updates. Until the City of Bremerton annexes the area in the Gorst UGA, the Kitsap County SMP will govern.

Exhibit 7 shows the City’s proposed shoreline use environments. Proposed shoreline designations include

- Urban Conservancy in the inner marine shoreline along the water
- Commercial or Isolated in the outer marine shoreline area in largely developed areas
- Aquatic Conservancy applied to the Marine waters (not mapped below) , and
- Single Family, Recreation, and Urban Conservancy along Gorst Creek

Exhibit 7 Bremerton Draft Shoreline Master Program



Source: City of Bremerton, 2012

The matrix in Exhibit 8 summarizes the land use and shoreline buffer requirements of the proposed Bremerton SMP.

Exhibit 8 City of Bremerton Draft Shoreline Master Program Provisions

Shoreline Environment	Land Uses Allowed	Shoreline Buffers
Urban Conservancy	Uses that can preserve natural character or restore ecological functions. Public access.	175 feet and 15 foot building setback
Isolated	Recognizes that there are areas that are within 200' of the shoreline, but isolated from the shoreline by intervening elements such as roads.	None
Commercial	High Intensity and water oriented commercial uses.	50 feet and 15 foot building setback
Single Family	Primarily intended for areas which are currently primarily single family residential, are planned, or are platted for single family residential use.	20%-30% of lot depth depending on lot depth; no more than 100 feet; and 15 foot building setback
Recreation	Primarily intended to provide recreational and public access opportunities and secondarily to maintain and restore ecological functions and protect open space.	100 feet and 15 foot building setback
Aquatic Conservancy	Scientific, historic, educational, and low intensity recreational uses.	See Draft SMP for aquatic conservancy protective measures.

Notes: For all designations, setbacks and buffers listed above the following shall apply:

- (1) Where lot depth is less than 150 feet on Commercial or Recreational lots, the buffers listed above may be reduced to 20% of the lot depth.
- (2) In no case shall a buffer be less than 10' or greater than 100' in the Shoreline Residential Designation.
- (3) Buffers are measured from the Ordinary High Water Mark.

Source: City of Bremerton, July 2012

Kitsap County proposes a similar shoreline environment approach as the City, except that the full marine shoreline north of the SR 3 and SR 16 interchange is shown as High Intensity. South of the interchange, the marine shoreline would be classified as Urban Conservancy in the inner jurisdiction along the water and High Intensity in the outer jurisdictional area. Gorst Creek would be classified as High Intensity and Urban Conservancy. Marine shorelines would have a 50-foot buffer within the High Intensity environment and 100 feet within the Urban Conservancy environment. Freshwater streams would have a 200 foot standard buffer. There are several exceptions to standard buffers (administrative buffer reductions and variances) for existing development, water oriented uses, and other activities. There would also be 15 foot building setbacks beyond buffers.

In addition to shorelines, the City and County regulate smaller streams (less than 20 cfs) and wetlands. The City and County buffers are similar. Most streams in the watershed are fish-bearing or could be if fish passage barriers are removed. In that case, the buffers would be 150 feet (plus a 15 foot building setback). Wetland buffers depend on quality and habitat scores and range from 35 to 200 feet.

See Exhibit 9 for a comparison of standard buffers. The County and City regulations are more complex and site-specific evaluations and a thorough review of regulations would be required to determine the extent of protective measures.

Exhibit 9 Bremerton and Kitsap County Shoreline, Stream, and Wetland Buffer Comparison

City of Bremerton	Standard Buffer (ft)	Reduced Buffer (ft)	Setback (ft)	Kitsap County	Standard Buffer (ft)	Reduced Buffer (ft)	Setback (ft)
Bremerton Shorelines: Proposed				Kitsap County Shorelines: Proposed			
Freshwater				Freshwater			
Commercial	50	Can reduce if lot depth is less than 150 ft.	15	Streams	200	Adminstrative Reductions with Criteria or Variance.	15
SF Residential	20-30% of lot depth		15				
Recreation	100		15				
Urban Conservancy	175		15				
Marine							
Isolated	0	Same as Freshwater	15	High Intensity	50	Variance	15
Commercial	50		15				
Urban Conservancy	175		15				
Urban Conservancy				Urban Conservancy			
100				100			
175				85			
15				15			
Bremerton Critical Areas Regulations: Existing				Kitsap County Critical Areas Regulations: Existing			
Streams							
F	150	Allowed if enhanced.	15 F	150	25-50% with a	15	
Np	50		15 Np	50	habitat mgmt	15	
Ns	35		15 Ns	50	plan.	15	
Wetlands							
Category I	200	Averaging	0 Category I	200	Averaging or	15	
Category II	100		0 Category II	100	admin	15	
Category III	75		0 Category III	50	reduction with	15	
Category IV	50		0 Category IV	30	criteria.	15	

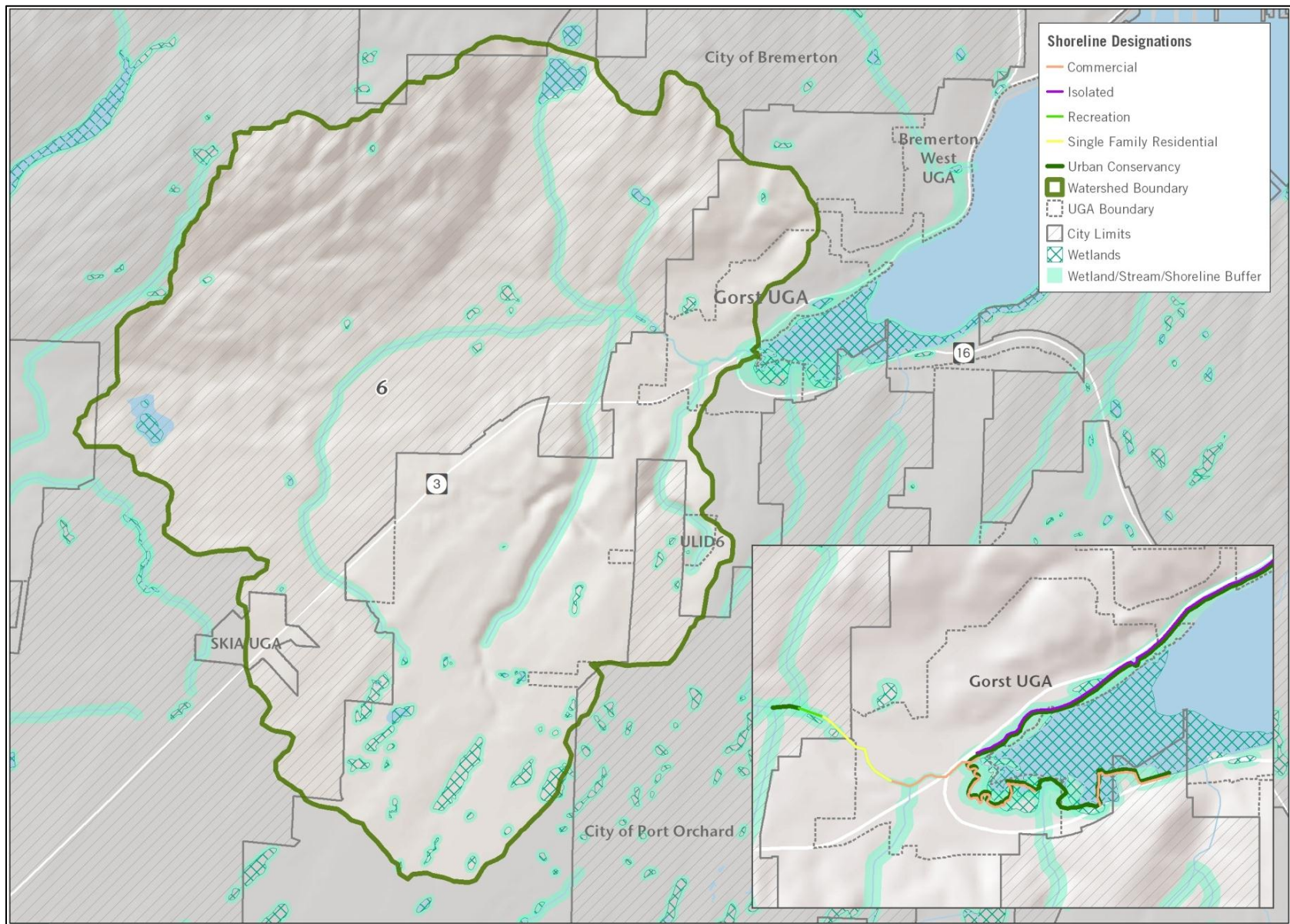
Source: City of Bremerton Municipal Code and City Council Review Draft Shoreline Master Program; Kitsap County Code and Kitsap County Planning Commission Review Draft Shoreline Master Program; BERK 2012

For planning purposes, the City's proposed shoreline buffers as well as the City-County buffers for streams (assumed 150 feet) and wetlands (assumed 100 feet) are shown on Exhibit 10. Due to the map scale and line widths, the shoreline buffers for Shoreline Residential designations are more difficult to see, but do extend beyond the "yellow" line (assuming a 100 foot lot depth and resulting 30 foot buffer on each side of the water body). Actual requirements along any critical area would vary based on site conditions and the application of all aspects of the City and County critical areas and shorelines regulations.

3.9 Freshwater and Marine Shoreline Integrated Map

The Watershed Characterization addresses freshwater systems and the SMP addresses marine shorelines as well as streams within shoreline jurisdiction. Exhibit 11 combines the watershed and Bremerton-proposed marine shoreline "designations" or management recommendations.

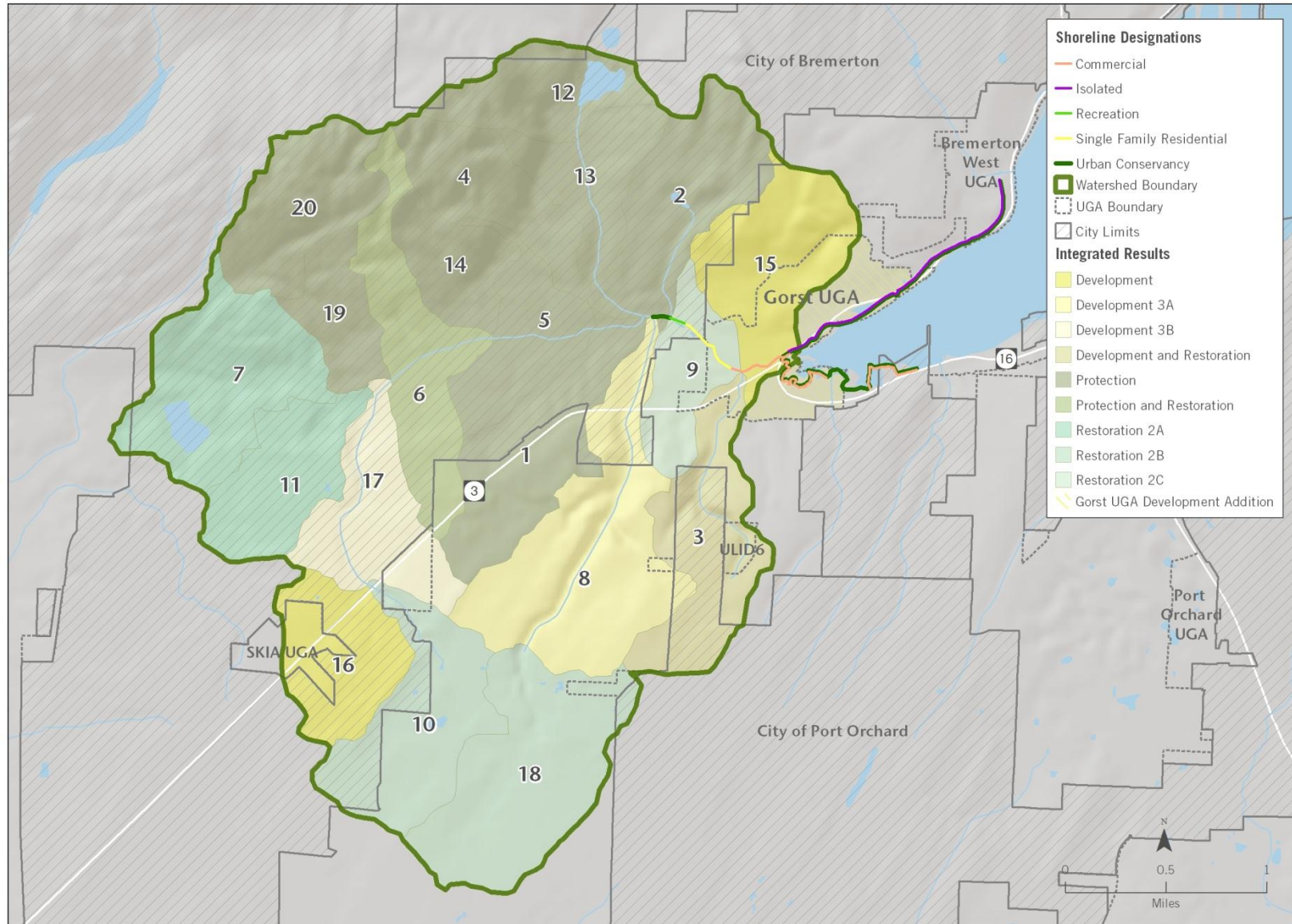
There are two areas in the Gorst UGA to the north and south unaddressed in the Watershed Characterization. These territories are extended the "development" designation of AU 15 since these areas are highly disturbed with high amounts of clearing and impervious surfaces, are generally developed with commercial, residential, or mining operations, and are served with sewers, roads, and stormwater facilities. See the *Gorst Creek Watershed Inventory and Characterization Technical Memorandum* (Parametrix, August 4, 2011) for additional mapped information about these areas.

Exhibit 10 Shoreline, Stream, and Wetland Buffers

Source: Parametrix, National Wetlands Inventory, Washington State Department of Natural Resources, Kitsap County, BERK 2012

Exhibit 11 Integrated Watershed, Shoreline, and UGA Results

GORST WATERSHED ASSESSMENT UNITS



Date: August, 2011
Source: Parametrix, Department of Ecology, Department of Fish & Wildlife, BERK

Source: Parametrix, Washington State Department of Ecology, Washington State Department of Fish and Wildlife, BERK 2012

4.0 INFRASTRUCTURE CONDITIONS

4.1 Sanitary Sewers

Sanitary sewers installed within the watershed by the City of Bremerton in 2010 are shown on Exhibit 12. A total of 125 residences and commercial properties have connected to this system as of August 2011. Remaining sanitary facilities consist of onsite septic systems; maps for these facilities are not available. Recent Kitsap County sewer maps show a similar layout of existing and planned sewer lines with a slightly longer sewer main on West Sherman Heights Road. See Exhibit 13.

4.2 Water Supply

Public water-supply facilities are shown on Exhibit 14. As shown, the City of Bremerton supplies drinking water to the Gorst UGA and portions of the SKIA UGAs. Water service to the McCormick Woods area is also partially supplied by the City of Port Orchard. Wellhead Protection Areas are shown on Exhibit 15.

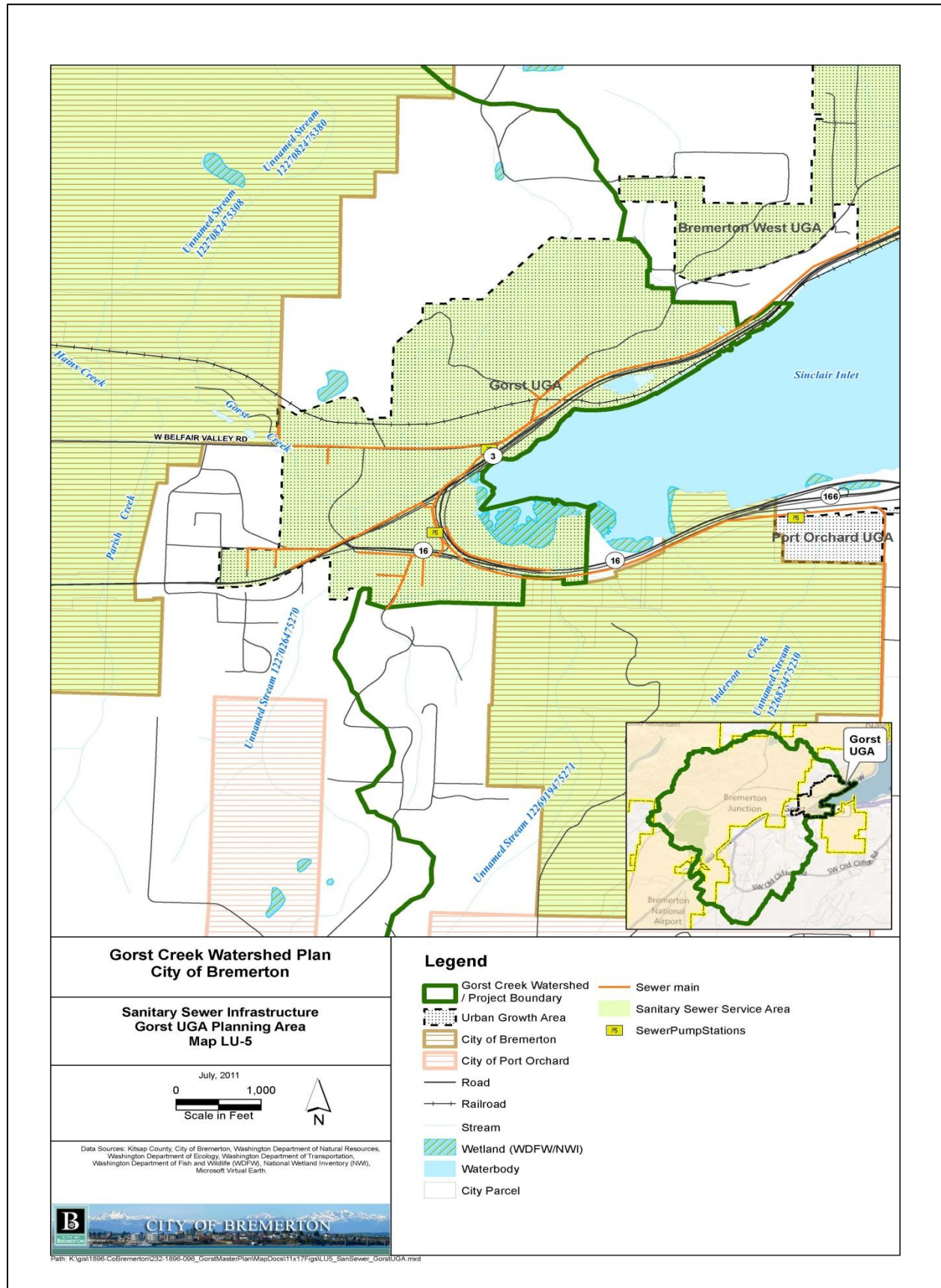
4.3 Stormwater

Stormwater infrastructure is shown on Exhibit 16 and Exhibit 17 for the watershed and Gorst UGA respectively. These facilities consist primarily of roadside drainage ditches with culverts located at road crossings. As shown on Exhibit 18, several of the culverts are fish passage barriers.

4.4 Transportation Systems

Transportation systems within the watershed are shown on Exhibit 19. The systems consist primarily of local roads and collectors providing access to State Highways 3 and 16. In addition, an active rail line that connects the Puget Sound Naval Shipyard (PSNS) with the Bangor submarine facility and the Port of Shelton bisects the watershed from east to west.

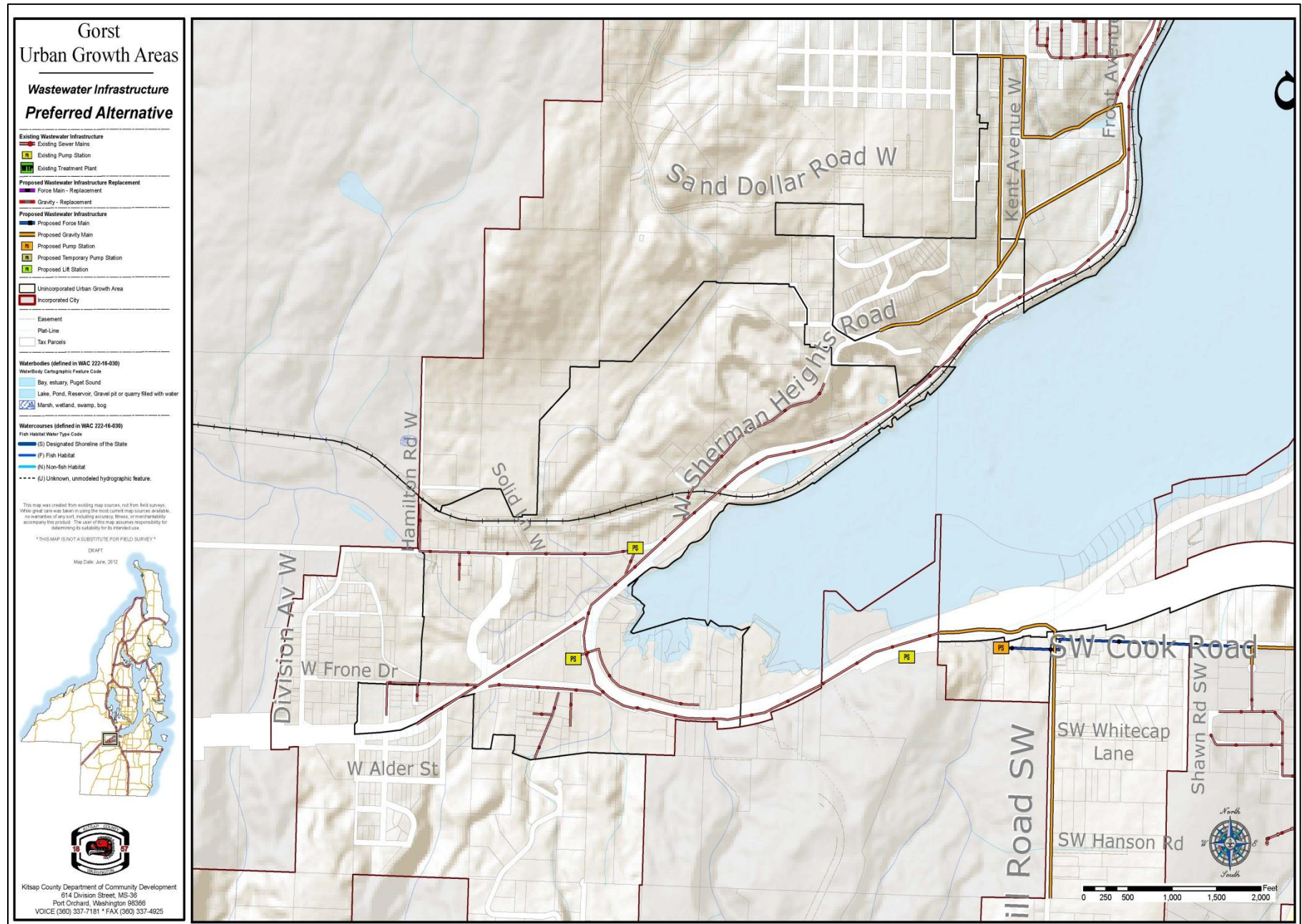
Exhibit 12 Sanitary Sewers – 2010



Note: UGA boundaries for the City of Port Orchard are as of 2011. In 2012, minor changes were made as shown in Exhibit 1.

Source: City of Bremerton, Parametrix, 2011

Exhibit 13 Sanitary Sewers – Kitsap County 2013-2025 Capital Facilities Plan

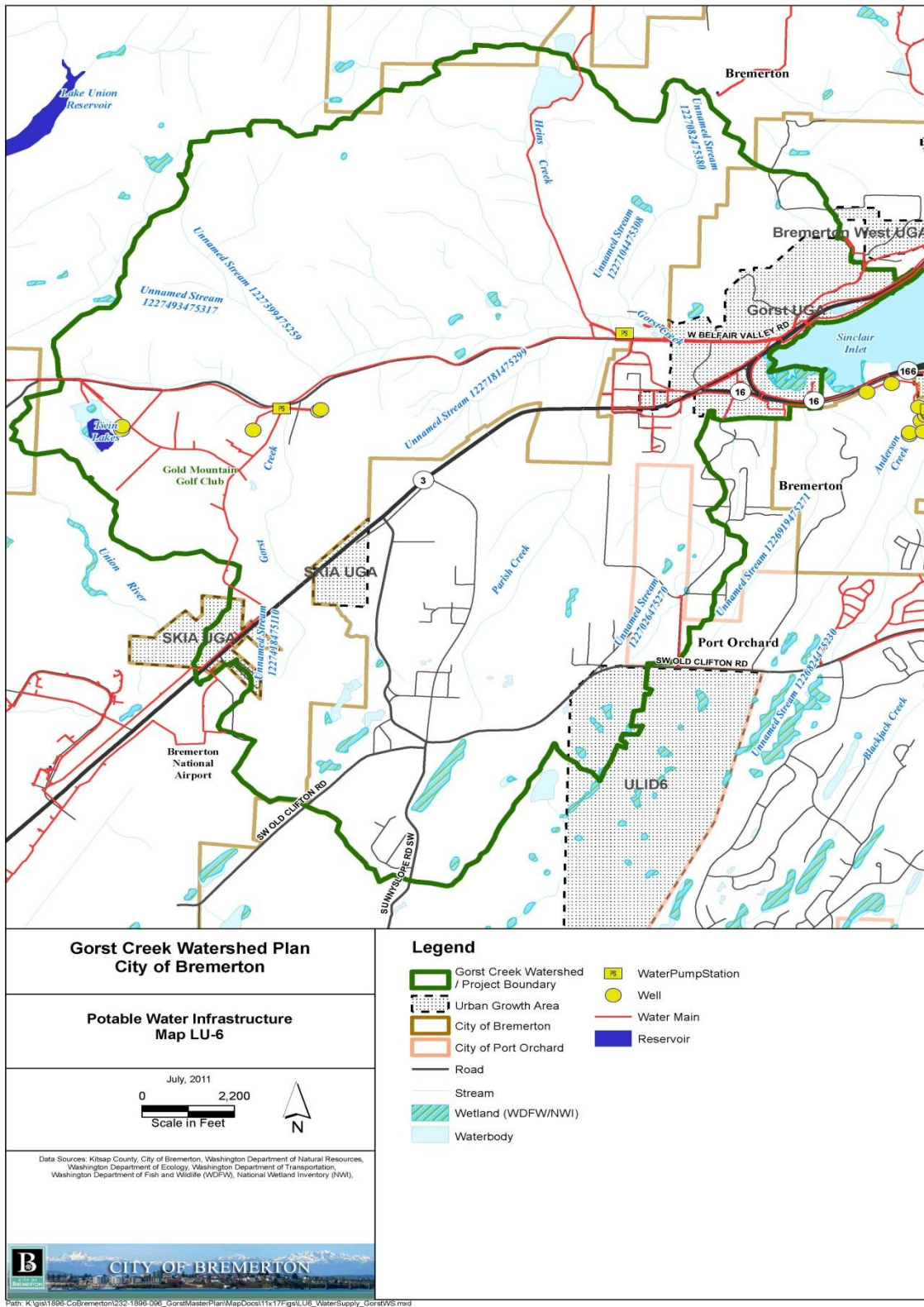


Source: Kitsap County 2012

October 2012

Gorst Creek Watershed

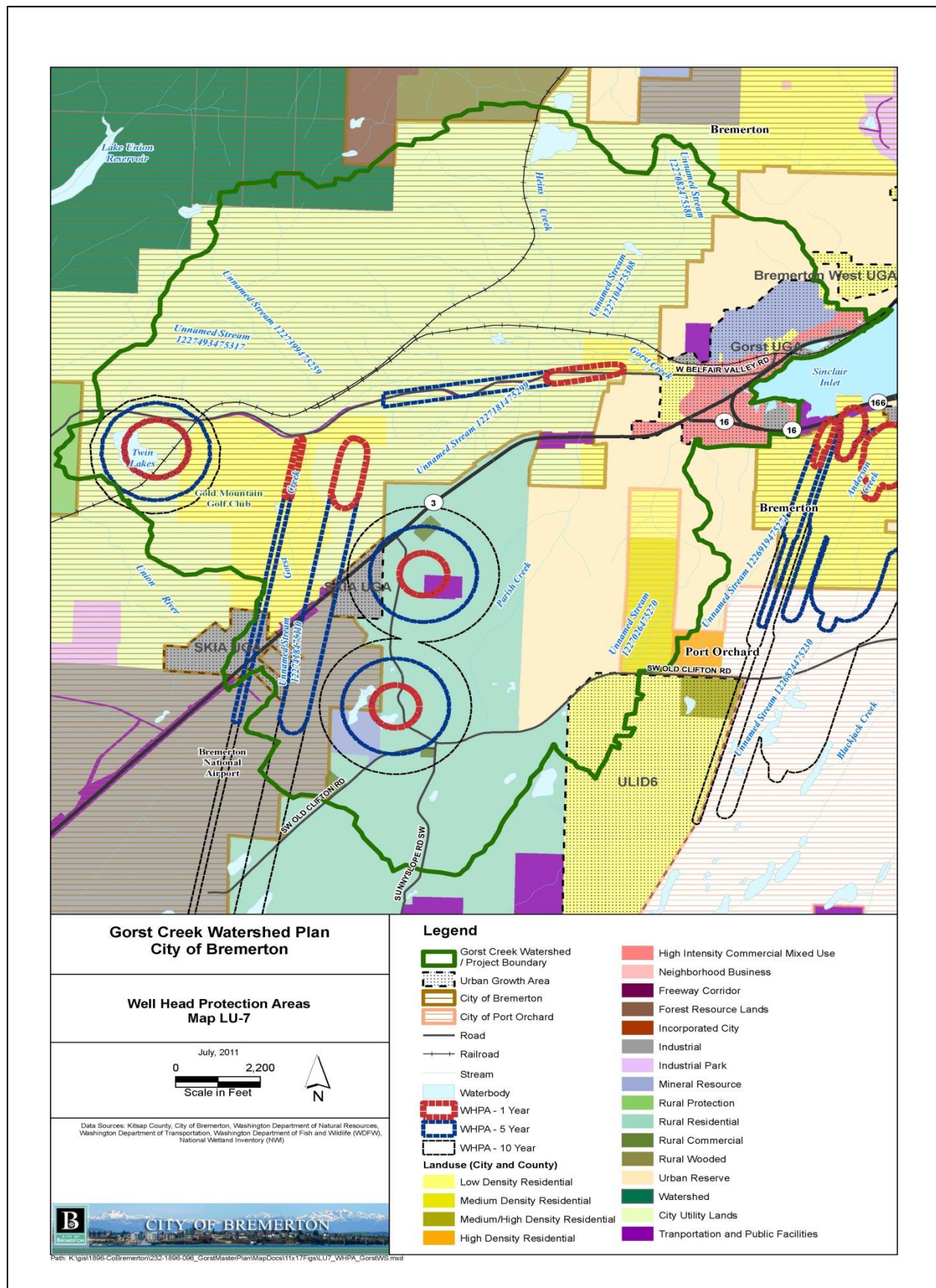
Exhibit 14 Water Systems



Note: UGA boundaries for the City of Port Orchard are as of 2011. In 2012, the City annexed the "ULID 6" UGA shown above. Also minor changes were made to the UGA as shown in Exhibit 1.

Source: City of Bremerton, Parametrix, 2011

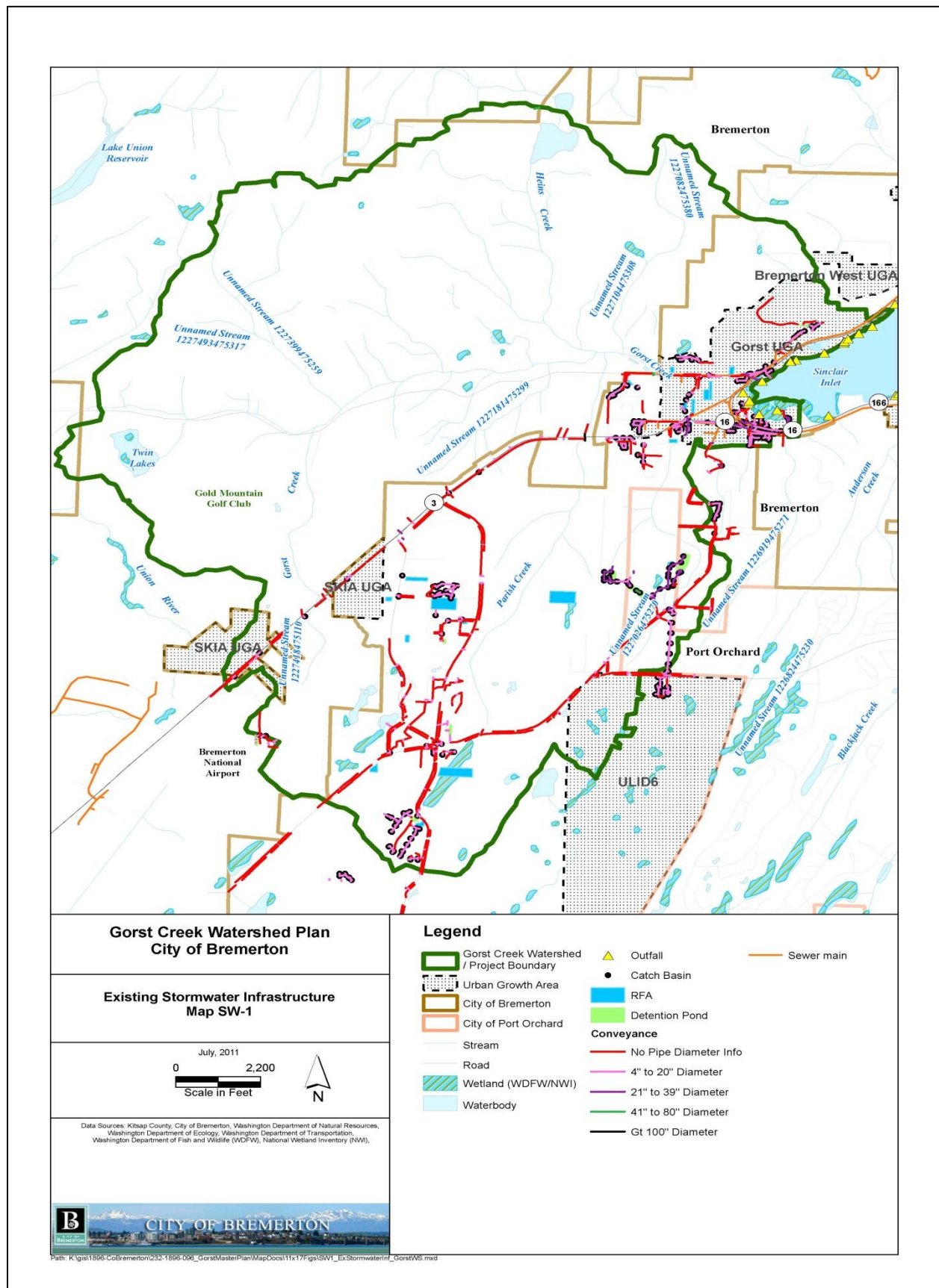
Exhibit 15 Wellhead Protection Areas



Note: UGA boundaries for the City of Port Orchard are as of 2011. In 2012, the City annexed the "ULID 6" UGA shown above. Also minor changes were made to the UGA as shown in Exhibit 1.

Source: City of Bremerton, Parametrix, 2011

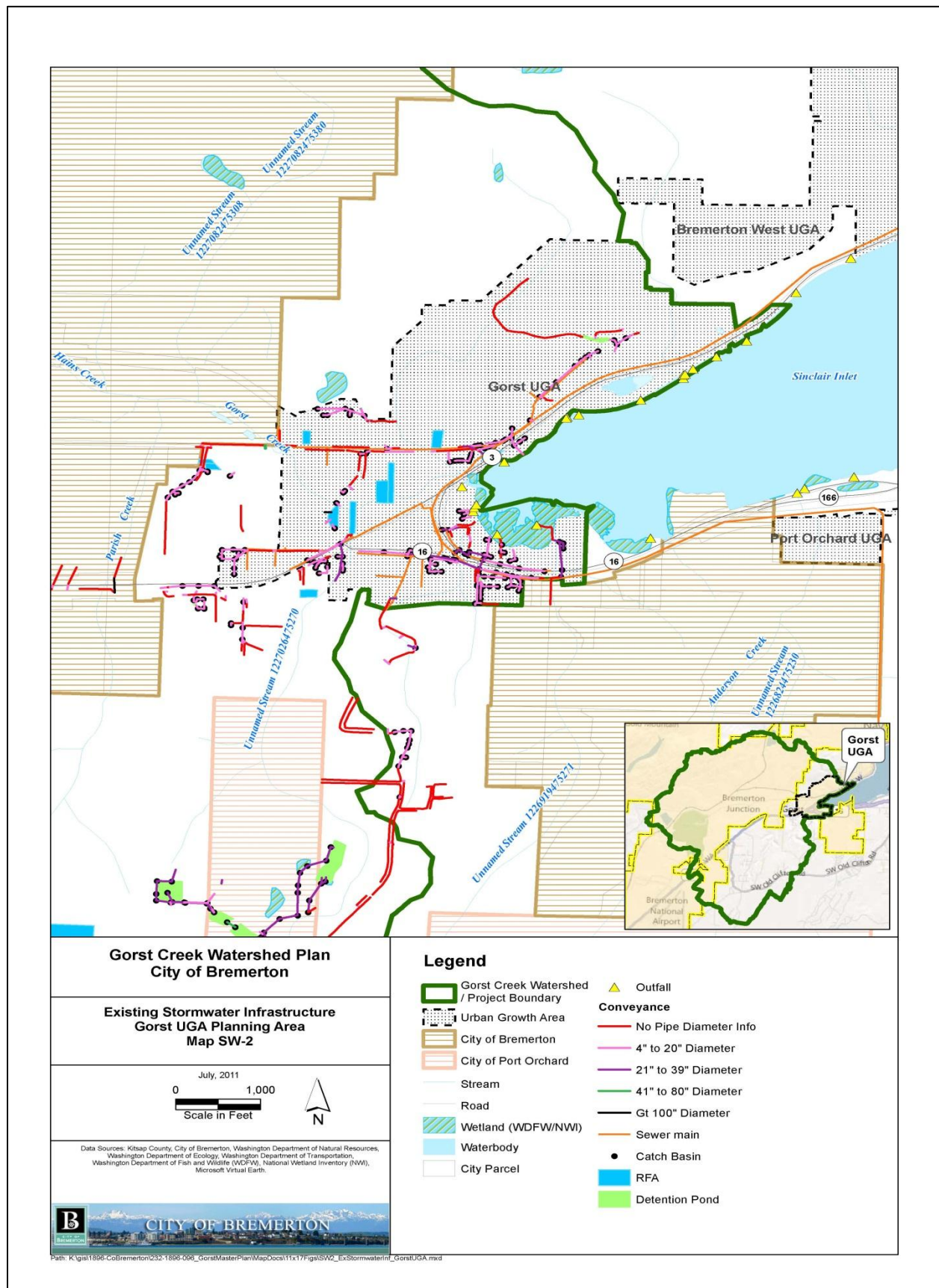
Exhibit 16 Stormwater Watershed



Note: UGA boundaries for the City of Port Orchard are as of 2011. In 2012, the City annexed the "ULID 6" UGA shown above. Also minor changes were made to the UGA as shown in Exhibit 1.

Source: City of Bremerton, Parametrix, 2011

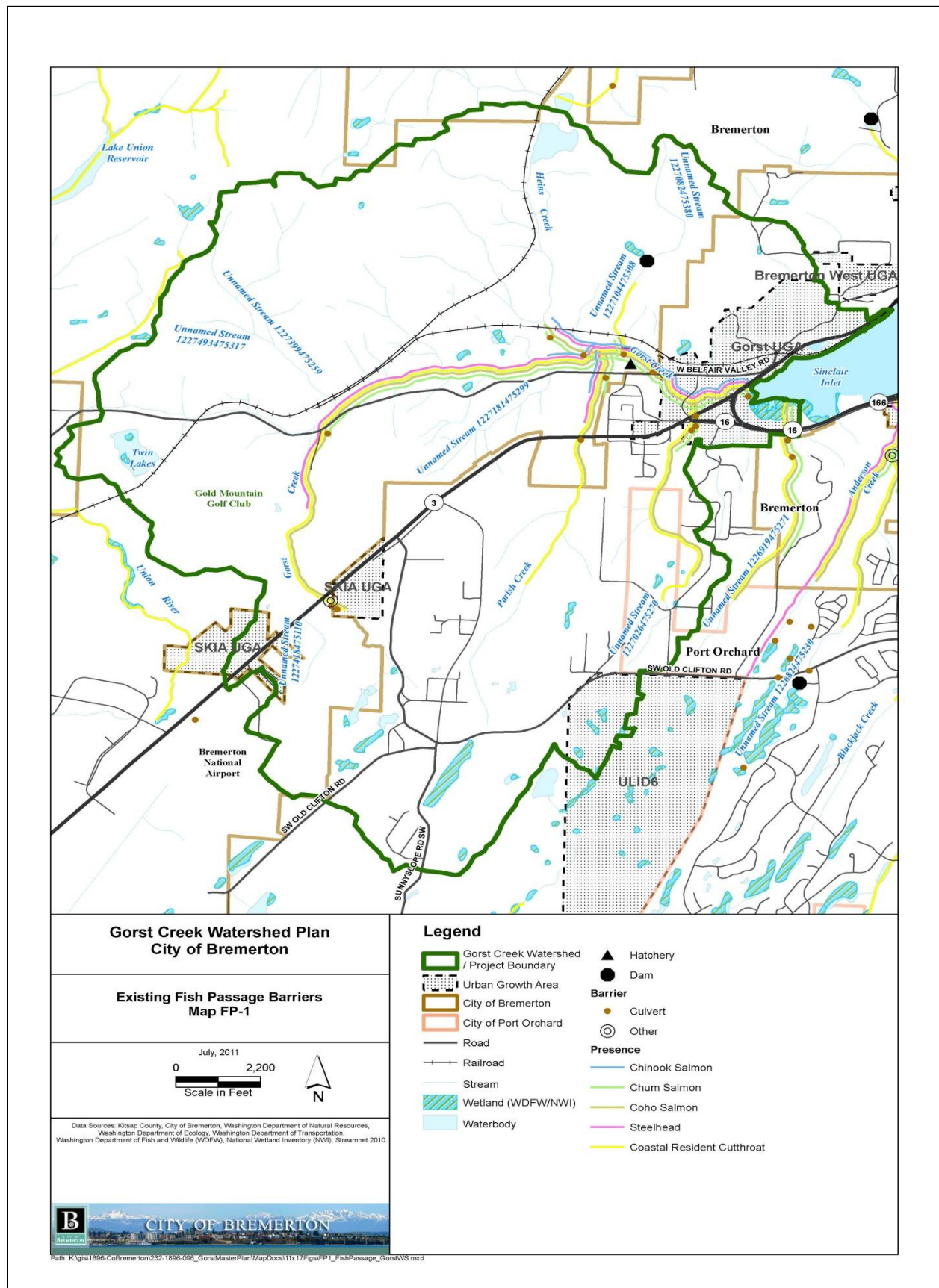
Exhibit 17 Stormwater UGA



Note: UGA boundaries for the City of Port Orchard are as of 2011. In 2012, the City annexed the "ULID 6" UGA shown above. Also minor changes were made to the UGA as shown in Exhibit 1.

Source: City of Bremerton, Parametrix, 2011

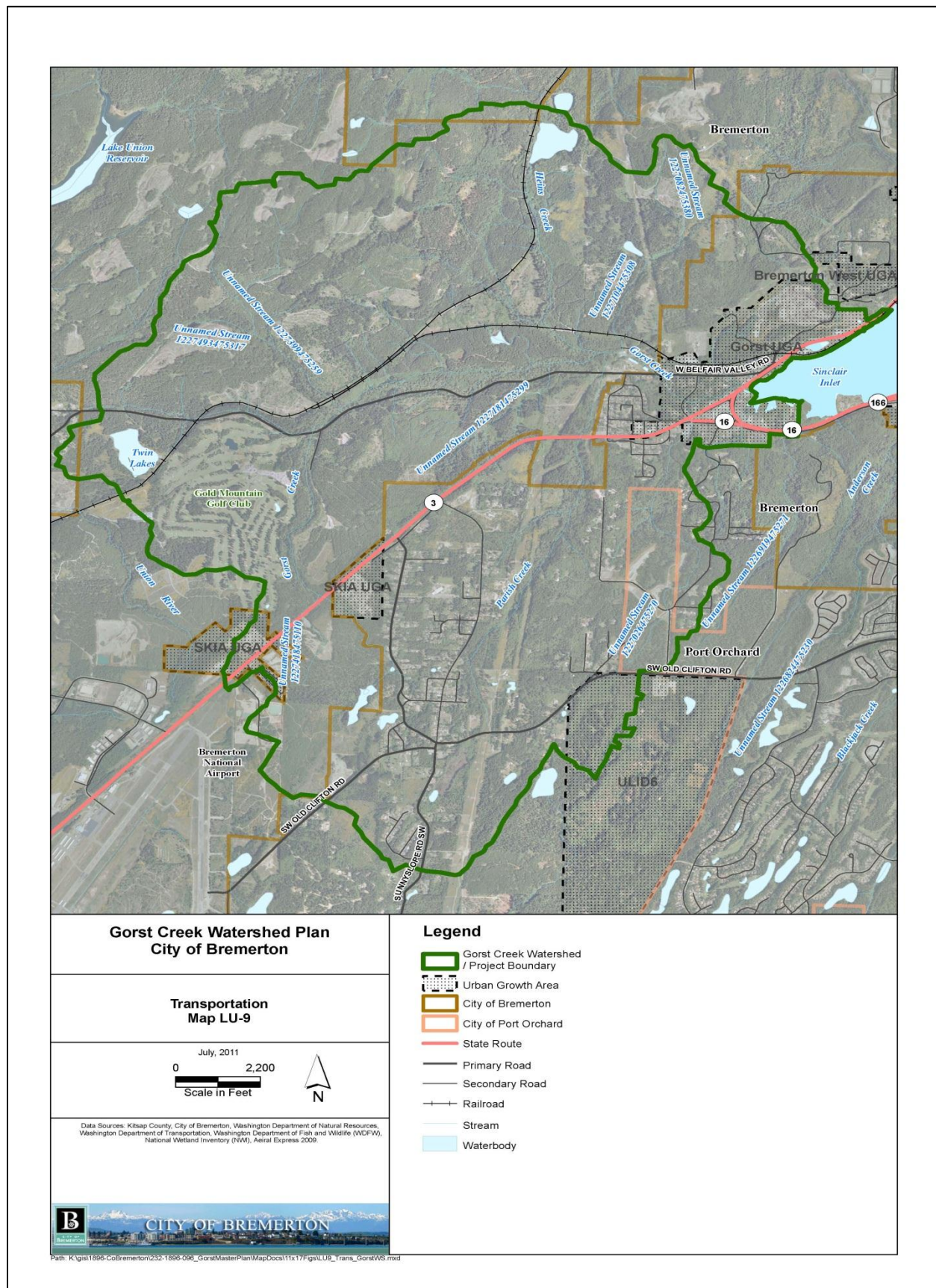
Exhibit 18 Fish Passage Barriers



Note: UGA boundaries for the City of Port Orchard are as of 2011. In 2012, the City annexed the "ULID 6" UGA shown above. Also minor changes were made to the UGA as shown in Exhibit 1.

Source: City of Bremerton, Parametrix, 2011

Exhibit 19 Transportation System



Note: UGA boundaries for the City of Port Orchard are as of 2011. In 2012, the City annexed the "ULID 6" UGA shown above. Also minor changes were made to the UGA as shown in Exhibit 1.

Source: City of Bremerton, Parametrix, 2011

5.0 URBAN GROWTH AREA BOUNDARIES

The Growth Management Act (GMA) requires cities and counties to prepare Comprehensive Plans and development regulations that promote compact growth in UGAs, protect rural character, and protect resource lands of long-term commercial significance including mineral lands, forest lands, and agricultural lands.

- **Urban Growth Areas (UGAs):** Designated area where future urban growth is to occur—must be appropriately sized to accommodate planned future population and employment, and to contain sprawl.
- **Rural Lands:** Area outside of UGAs and outside designated agricultural, forest, and mineral lands—can consist of a variety of uses and residential densities, including clustered residential development, at levels that are consistent with the preservation of rural character and the requirements of the Comprehensive Plan rural element.
- **Resource Lands:** Lands of long-term commercial significance for agricultural, forestry or mineral resources. While designated mineral lands may be located in UGAs, agricultural and forestry lands of long-term commercial significance are not allowed in UGAs unless there is a transfer or purchase of development rights program.

The Gorst Creek Watershed contains urban and rural lands, and one mineral resource property inside the Gorst UGA. The focus of this section is on the urban lands and their relationship to the Watershed Characterization results. In general, the areas assigned in County and City plans for urban growth are considered “Development” areas in the Watershed Characterization analysis. Individual areas are addressed below.

Three urban areas are included in the study area: 1) Bremerton City Limits, including areas known as the City Utility Lands and SKIA; 2) the Port Orchard City Limits, encompassing a master planned community called McCormick Woods/ULID 6; and 3) the Gorst UGA, including unincorporated land assigned to the City of Bremerton UGA. All urban areas except for Gorst and Bremerton’s utility lands have been the subject of master plans or subarea plans.

Bremerton’s City Utility lands are owned by the City and are for low intensity forestry purposes. See Exhibit 20. City zoning shows the following intended activities (BMC 20.96.010):

The intent of the city utility lands (CUL) zone is to preserve resource-related functions of land, and to protect watersheds and timberlands. The CUL zone is also intended to ensure healthy forest cover and provide habitat for wildlife. The zone will accommodate some limited commercial and recreational activities, which adhere to a high standard of environmental best management practices, and low impact development.

The City Utility Lands are generally considered to include areas of “Protection” and “Protection and Restoration,” as designated by the Watershed Characterization results.

The SKIA area is subject to its own subarea plan, recently adopted by the City on August 1, 2012. The area is planned as industrial (See Exhibit 20). The subarea plan encourages development to occur in a sustainable, energy efficient and environmentally protective manner. The SKIA area is considered to be in an area of development (AU 16).

The City of Port Orchard annexed the McCormick Woods/ULID 6 land recently in 2012, with the exception of 3 parcels newly added by Kitsap County as a UGA territory in August 2012. These three

parcels are for public use purposes and are likely to be annexed soon by the City of Port Orchard (See Exhibit 20). The Watershed Characterization results showed the land area to be part of a “Development and Protection” area (AU 3). Given the approved development agreement, it is unlikely that the results of this study would influence any final remaining development phases in the area.

The Gorst UGA has been identified by Kitsap County as predominantly a commercial area. It contains a mine designated in the Comprehensive Plan as Mineral Resource, and zoned as Industrial (see Exhibit 20). As a predominantly employment-focused UGA, the Gorst UGA has been given a low population growth target of 76 additional persons between 2010 and 2025 (Kitsap County, 2012). Population capacity is estimated at 82 persons, just above the growth target. County estimates of employment increases between 2006 and 2025 shows a potential for 742 new jobs.

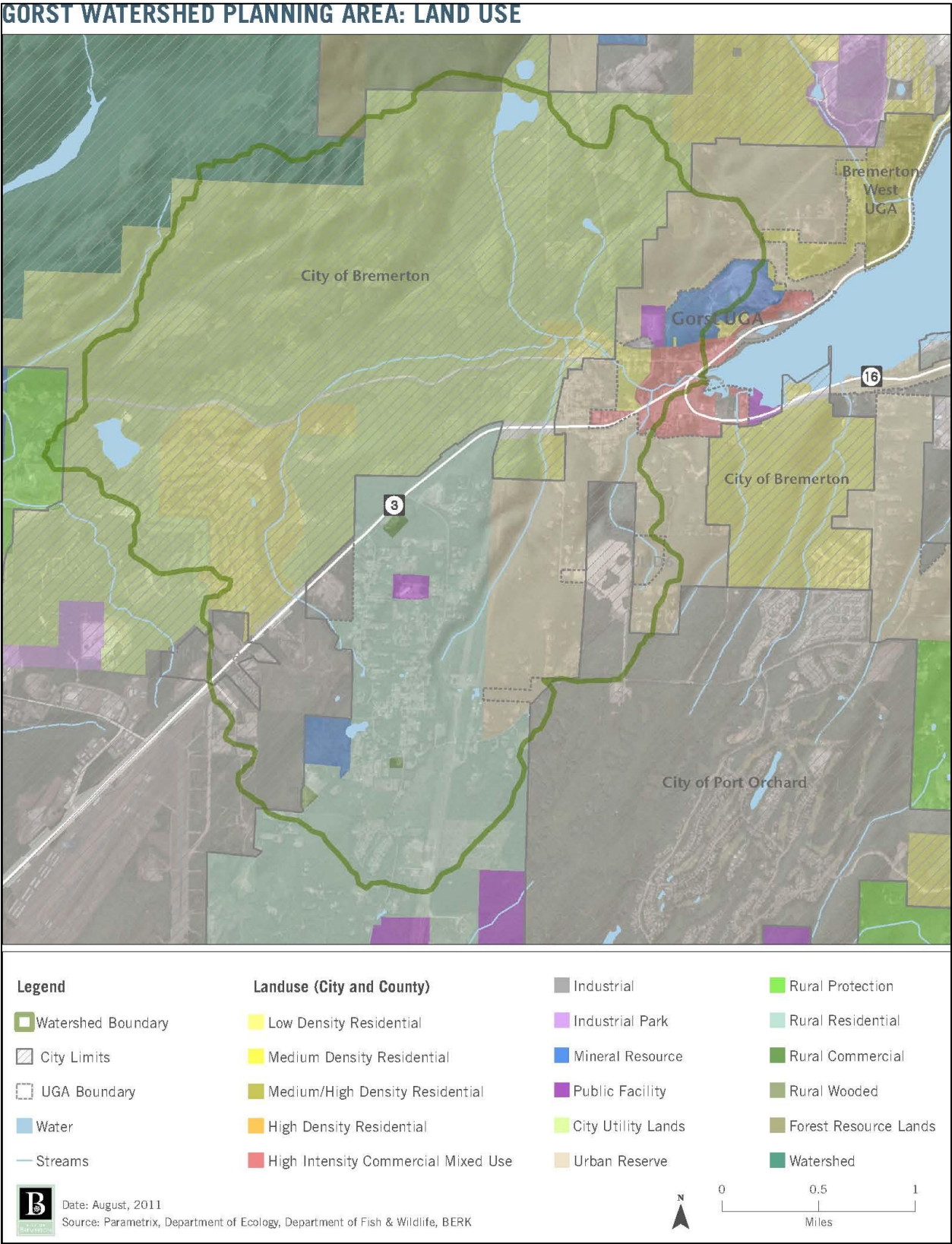
The Gorst UGA is generally considered a “Development” area (AU 15), though one portion to the west is considered to be an area of Restoration (Restoration 2C) where stream corridor restoration and a stormwater retrofit program are promoted.

The Gorst UGA was recently one of eight UGAs subject to a thorough County review in 2012 due to a Growth Management Act Hearings Board Remand. The County considered whether eight UGAs were appropriately sized and whether residential density assumptions required amendment (particularly low density residential areas). No changes were made to the UGA boundaries or land use classifications in Gorst, though other UGAs in the County were affected.

No Gorst UGA expansion proposals are under consideration for the current 20-year planning horizon². However, the results of the Watershed Characterization could be useful in guiding the application of “Urban Reserve” designations that would be primary locations for any future UGA boundary increases. Urban Reserve designations could be applied to the more developable and less sensitive lands in the watershed. For example, there could be small UGA boundary adjustments to connect the West Bremerton and Gorst UGAs that are assigned to the City of Bremerton as the future service provider should the areas annex to the City. The Gorst Creek Watershed Characterization report could also influence the location of land use redesignations within the UGA where appropriate.

² For the purposes of this evaluation 2035 is considered the horizon year because that year would be approximately 20 years from the date of the County’s and City’s next comprehensive plan updates 2016.

Exhibit 20 Planned Land Use – Gorst Creek Watershed Study Area

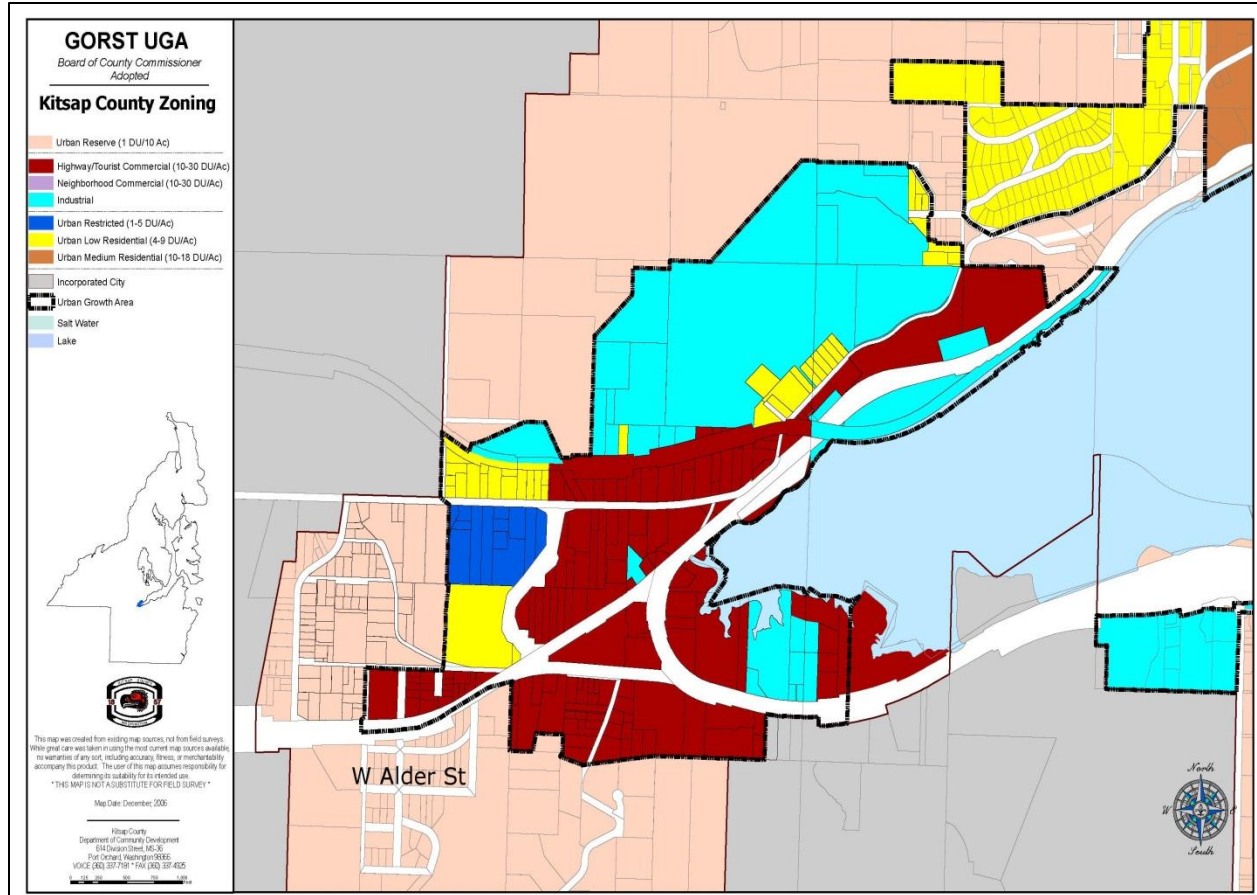


Source: City of Bremerton, Kitsap County, BERK 2012

6.0 GORST UGA ZONING COMPARISON

The Gorst UGA is currently subject to Kitsap County zoning standards. Exhibit 21 below shows the current zoning that implements the land use designations on Exhibit 20 above.

Exhibit 21 Gorst UGA – Kitsap County Zoning



Source: Kitsap County 2006

The predominant Kitsap County zoning categories are Highway/Tourist Commercial and Industrial. A summary description of County zoning and the nearest equivalent City zoning³ is shown in Exhibit 22, Exhibit 23, and Exhibit 24 below. The pending Gorst Subarea Plan will likely create Gorst UGA-specific zoning.

Generally, similar flexible commercial uses, greater heights, and limited residential options would be allowed in Bremerton's commercial zone compared to Kitsap County's equivalent zoning.

Exhibit 22 Commercial Zoning Comparison

	Kitsap County Commercial Zone	Equivalent Bremerton Zone
Applicable Zones	Highway/Tourist Commercial	Freeway Corridor (FC)

³ In a prior Comprehensive Plan docket cycle, the City identified County plan and zoning designations and the equivalent City plan and zoning designations, which are reflected on Exhibits 22 to 24.

	Kitsap County Commercial Zone	Equivalent Bremerton Zone
Major Uses Allowed	Commercial/Business Hotel/Motel MF Residential or Mixed Use (ACUP)	Any use permitted unless prohibited or CUP
Density Range (du/ac)	10-30	Residential not allowed as primary or secondary use
Building Height Max (feet)	35	60
Front Setback (feet)	Min 20, no max	Min 20, no max
Building Coverage Max (%)	Not applicable	Not applicable
Impervious Surface Max (%)	85%	Not applicable

Source: Kitsap County Code 2012, Bremerton Municipal Code 2012

Greater height is allowed in Bremerton's Industrial zone, though less lot coverage is allowed than the County's zoning.

Exhibit 23 Industrial Zoning Comparison

	Kitsap County	City of Bremerton
Applicable Zones	Industrial	Industrial
Major Uses Allowed	Industrial Commercial/Business (office, heavy com.)	Industrial Commercial/Business (office, heavy commercial)
Building Height Max (feet)	35	50
Front Setback (feet)	Min 20, no max	Min 10, no max
Building Coverage Max (%)	60%	0%
Impervious Surface Max (%)	Not applicable	0%

Source: Kitsap County Code 2012, Bremerton Municipal Code 2012

The County's Urban Low Residential zone and City's Low Density residential zoning are similar in density ranges. The County also has an Urban Restricted zone that would allow for between 1 and 5 units per acre.

Exhibit 24 Residential Zoning Comparison

	Kitsap County	City of Bremerton
Applicable Zones	Urban Low Residential	Low Density Residential (R-10)
Major Uses Allowed	Residential SF Accessory Dwelling Unit (ADU) Cottage Housing (ACUP) Residential MF (CUP)	Residential SF ADU Cluster residential Senior Housing (CUP)
Density Range (du/ac)	5-9	Standard 5 min, max based on neighborhood average Fringe 5-10 min/max du/ac
Lot size minimum (sq ft)	2,400	4,300 * subject to neighborhood average lot area, and neighborhood compatibility
Lot width minimum (feet)	40	30
Building Height Max (feet)	35	35
Front Setback (feet)	10 home; 20 garage	15
Building Coverage Max (%)	Not applicable	60%
Impervious Surface Max (%)	Not applicable	Not applicable

Source: Kitsap County Code 2012, Bremerton Municipal Code 2012

Zoning assumptions factor into the land capacity analysis presented below.

7.0 GROWTH TARGETS AND LAND CAPACITY ANALYSIS

7.1 Growth Targets

Future growth is based on population distributions recommended by the Kitsap Regional Coordinating Council (KRCC), which is composed of elected officials and planning directors from all city and Tribal jurisdictions in addition to the Board of County Commissioners (BOCC) and Kitsap County's planning director. The population distributions were adopted by the BOCC and ratified by the cities.

Based on Kitsap County's 2012 UGA review, the current net growth targets are as shown in Exhibit 25. While the Gorst growth target and land capacity are low, Bremerton has population that is unaccommodated in other assigned UGAs (e.g. Bremerton East and Bremerton West in particular total - 1,776 of unaccommodated population). Kitsap County Comprehensive Plan policies support population reallocation discussions through the KRCC. In addition, the KRCC is planning to prepare new growth targets for the 2010-2035 time period, and there may be opportunities to reallocate or newly allocate population growth.

Exhibit 25 Comparison of Growth Targets and Population Capacities

Urban Growth Area	Growth Target 2010-2025	2012 Preferred Alternative	
		Capacity	Difference from Target
Kingston UGA	2,805	2,821	16
Poulsbo UGA	3,739	2,152	-1,587
Silverdale UGA	7,779	7,768	-11
Central Kitsap UGA	6,191	6,500	309
Bremerton East UGA	3,529	2,017	-1,512
Bremerton West UGA	2,346	2,082	-264
Gorst UGA	76	82	6
Port Orchard UGA	8,506	8,006	-500
McCormick Woods UGA ULID6	6,780	8,093	1,313
Bremerton Port UGA (SKIA)	-129	0	-129
Uninc. UGA Total	41,622	39,521	-2,359
<i>Percent Difference from Target (including Poulsbo and SKIA)</i>			<i>-6%</i>

Source: Kitsap County 2012

Employment projections were used in 2006 to help allocate future land use in UGAs. While the County projects future employment, there is no specific employment target for Kitsap County or its jurisdictions. The County last studied employment growth for a planning period of 2005-2025. The County's 2006 analysis showed that the Gorst UGA had an approximate demand for about 700 commercial and industrial jobs (based on trends between 1995 and 2004), a surplus of commercial land and a low demand for industrial land. See Exhibit 26. The County's land capacity analysis in 2006 showed a capacity for about 742 jobs, close to the trended analysis.

Exhibit 26 Estimated Net Land Demand by Unincorporated UGA, 2025

UGA	Estimated Net New Jobs 2005 - 2025			Existing Vacant Land Supply (Acres)			Estimated Net Land Need by 2025	
	Commercial	Industrial	Total	Commercial	Industrial	Total	Commercial	Industrial
Bremerton East	75	331	406	6	-	6	insignificant	very low
Bremerton West	1,501	308	1,809	10	13	23	low	low
Central Kitsap	3,876	2,029	5,905	101	10	110	mid	very high
Gorst	86	606	692	31	6	37	surplus	low
Kingston	1,406	457	1,863	34	10	44	low	low
McCormick Woods	25	70	95	-	53	53	insignificant	none*
Port Orchard	2,237	1,115	3,352	231	19	250	none*	mid
Poulsbo	729	681	1,411	-	10	10	low	low
Silverdale	6,322	3,646	9,969	133	293	426	very high	very high
SKIA	529	3,196	3,726	-	1,575	1,575	very low	none*
ALL	16,787	12,440	29,228	547	1,988	2,535		
Notes:	<p>Job forecasts for unincorporated UGAs begin with a straight line projection of observed growth between 1995 and 2004, and are then increased so that total unincorporated UGA job growth matches the county's residual growth (after city growth is subtracted) of 29,228. This residual target is a product of a county-generated countywide forecast that included a policy commitment to significantly increase the county's manufacturing jobs base. City forecasts, prepared according to varying methodologies, were subtracted from this total. The total unincorporated UGA target forecast reflects ambitious manufacturing growth targets, compensates for lower growth trends that cities may have assumed, and assumes that most growth generated from rural area employment (approximately 13,000 jobs in 2004) is allocated to UGA boundaries. Ten percent of residual county employment growth has been reserved for rural areas outside of the Urban Growth Areas.</p> <p>*The past employment trends that ground this land demand analysis may or may not be carried into the future (particularly if circumstances such as available infrastructure change). This data should be viewed as contextual information rather than a limiting factor in policy decisions.</p>							
Source:	PSRC; Kitsap County, Kitsap County Updated Land Capacity Analysis (2005), E.D. Hovee & Company.							

Source: Kitsap County 2006

7.2 Land Capacity Analysis

Land capacity is an estimate of the amount of development that land can accommodate given land use regulations and local development conditions or circumstances. Land capacity can then be compared to growth targets to ensure an urban area is properly sized.

The land capacity analysis (LCA) framework methodology was originally developed and adopted by Kitsap County in 2005 and recently applied in a 2007 Buildable Lands Report (Kitsap County and Personius 2007). The LCA involves a series of steps to derive net population and housing unit capacity for residential lands and net buildable acres for commercial/industrial zoned lands. The steps are listed below (reduction factors are noted with a minus (-) sign):

- Define Vacant Parcels by Residential Zone
- Define Underutilized Parcels by Residential Zone Based on a Combination of Existing Use, Zoning Density, Parcel Size and Assessed Value
- Identify Critical Areas (-)
- Future Roads/R-O-W Needs (-)
- Future Public Facilities Needs (-)
- Account for Unavailable Lands (-)
- Yields Net Available Acres by Zone
- Apply Appropriate Density in each Zone to Yield Housing Unit Capacity
- Apply Average Household Size to Housing Unit Capacity to Yield Net Population Capacity

The City uses a similar method as Kitsap County to determine land capacity, with the following exceptions:

- Underutilized lots have a 12,500 square feet threshold (0.29 acres), rather than the County's threshold of 1.25 acres.
- The City does not remove shoreline lots from the land capacity analysis, whereas the County removes them if they are less than one acre in size.
- The City would apply a 15% right of way deduction for residential lands whereas the County recently increased that percentage to 20% given recent (2006-2010) plat activity.
- The City applies between a 10%-90% market factor in centers; this is higher than the County's removal of 5% of vacant lots and 15% of redevelopable lots.

Results of the Kitsap County LCA method show a net increase of 33 dwelling units, 82 persons, and 742 jobs, most of which are commercial. See Exhibit 27.

Exhibit 27 Kitsap County Residential and Commercial Land Capacity Analysis (LCA)

Land Use	Vacant Net Underutilized			Dwellings	Population	Jobs
	Density	Acres	Net Acres			
Low Density Residential	2.5-6 du/ac	1.87	4.07	33	82	-
Medium Density Residential	10 du/ac	-	-	-	-	-
Commercial	not applicat	6.08	15.50	-	-	606
Industrial	not applicat	10.28	2.86	-	-	136
Total		18.24	22.43	33	82	742

Source: Kitsap County 2012; Kitsap County 2007

As part of developing a Subarea Plan and Planned Action EIS⁴ for the Gorst UGA, the No Action alternative (current plan/zoning) will be studied. In addition, two action alternatives would be studied. These action alternatives could involve reviewing an alternative set of land use assumptions. Some possible areas of land use change include:

- **Future development of the mine site.** Currently, there is an active mine site in Gorst. However, over the 20-year planning period, when mineral extraction ceases and reclamation occurs, residential uses could be desirable. First, the property is a relatively large site located near job centers (e.g. Naval Shipyard and SKIA). Second, sewer service is available in the immediate vicinity. Third, with the gravel mine's location along Sherman Heights Road and with views of Sinclair Bay, residential uses may be attractive (demonstrated in nearby Sinclair Heights development).
- **Mixed use commercial and residential development.** Gorst has typically served as a commercial center for auto-oriented uses. However, the current County commercial zoning allows the possibility of residential development, and, in fact, some commercially zoned lands contain residential uses, e.g. along West Belfair Valley Road. Mixed uses and multifamily residential development that transitions in density could be encouraged in some UGA locations.

⁴ A planned action provides more detailed environmental analysis during formulation of planning proposals rather than at the project permit review stage (see WAC 197-11-164 to 172). When consistent with the planned action ordinance including specified mitigation measures, future development proposals do not have to undergo an environmental threshold determination, and are not subject to SEPA appeals.

- **Gorst Creek special overlay district.** Gorst Creek would be protected by stream buffers. The creek is also targeted for restoration in the Watershed Characterization analysis. The Subarea Plan and regulations could include incentives for restoration and promotion of clustering away from the stream such as through an overlay district on top of both commercial and residential zoning.
- **Potential minor adjustment of UGA boundaries for logical service delivery.** There is a small gap of unincorporated land between the West Bremerton and Gorst UGAs, though both are UGAs assigned to the City of Bremerton as the future governing agency should the areas annex to the City. It may be possible to identify properties that could be added to either UGA (e.g. properties that are urban in nature and that could be served with urban services). Their inclusion in the UGA could allow for a more serviceable boundary. As there are no current UGA expansion proposals, UGA adjustments could be considered in Urban Reserve areas in future planning periods.

Other areas of land use change may be identified through an EIS scoping process anticipated in fall 2012.

To test alternative growth levels and variations of the City's LCA approach this analysis assumes that the mine site would develop at an average 10 units per acre and that mixed use areas would develop at an average of 12-20 units per acre. No UGA boundary changes are assumed. Population and employment growth would change as shown in Exhibit 28. The population range is 878 to 1,916, much higher than the County's LCA results of 82 new persons. The job range is 309 to 1,076 encompassing the County's LCA assumption of about 742 jobs.

**Exhibit 28 Alternative Land Capacity Analysis (LCA):
Including Mine Redevelopment and Commercial Mixed Use**

Land Use	Density	Vacant Net Underutilized				
		Acres	Net Acres	Dwellings	Population	Jobs
Low Density Residential	5-6 du/ac	1.99	4.32	36	91	-
Medium Density Residential: 50% of mine	10 du/ac	-	21.77	218	544	-
Medium Density Residential: 75% of mine	10 du/ac	-	32.66	327	816	-
Commercial/Mixed Use Even Split	12.5 du/ac	6.08	15.50	135	243	940
Commercial/Mixed Use Med	15 du/ac	6.08	15.50	324	583	173
Commercial/Mixed Use High	20 du/ac	16.27	39.77	560	1,009	224
Industrial	not applicat	10.28	2.86	-	-	136
Total Low Range		18.35	44.45	389	878	1,076
Total Med Range		18.35	44.45	578	1,218	309
Total High Range		28.54	79.60	923	1,916	360

Notes:

1. This analysis uses County LCA worksheets completed in 2006 for commercial/industrial lands and 2012 for residential lands. When considering City LCA adjustments the County worksheets were modified.
2. Mine site is shown on County maps as having steep slopes. The variations consider whether density is discounted on 50% of the site or 25% of the site due to steep slopes since much of the slopes are man-made.
3. Commercial/Mixed Use Even Split assumes net acres consistent with County method (assumes current pattern is not a "block style" City neighborhood) and a density consistent with the mid-mid-point of County zoning. A buildable lands review showed little mixed use activity in County UGAs. Half of the acres would be used for residential and half for commercial.
4. Commercial/Mixed Use Med assumes net acres consistent with County method (assumes current pattern is not a "block style" City neighborhood) and a density more consistent with a mid-point of County zoning. A buildable lands review showed little mixed use activity in County UGAs. The density is applied to full net acres, assuming vertical mixed use, more consistent with City LCA method. Jobs would be calculated consistent with the City's LCA method to net acres shown.
5. Commercial/Mixed Use High applies the Bremerton LCA method and 20 units per acre consistent with District Centers.
6. City LCA methods for employment focus on Commercial Centers. For the purposes of this review, the County LCA approach for industrial jobs is maintained.

Source: BERK 2012

7.3 Land Capacity and Growth Target Comparison

As part of the Gorst UGA planning process, it would be possible to study population and jobs that are different than the County or regional growth assumptions if appropriate to the future vision of Gorst. Given the Gorst Watershed planning process is estimated to be completed in 2013, the ability to alter growth targets immediately is limited. However, growth allocation modifications may be possible in the upcoming 2014-2016 Comprehensive Plan Update cycle through a regional process with the KRCC (see Section 7.1 above). As growth assumptions are considered, it should be noted that the County's recent 2012 Remand effort showed the County's intent for compact UGA boundaries.

Regarding population ranges, this analysis suggests a portion of the excess population in East and West Bremerton could be reallocated to Gorst. Job growth estimates can be locally determined since there is no formal jobs target, and studying 310 to 1,100 jobs including the "No Action" level of 742 jobs appears appropriate.

8.0 LAND USE STRATEGIES AND PERMIT PATHWAYS

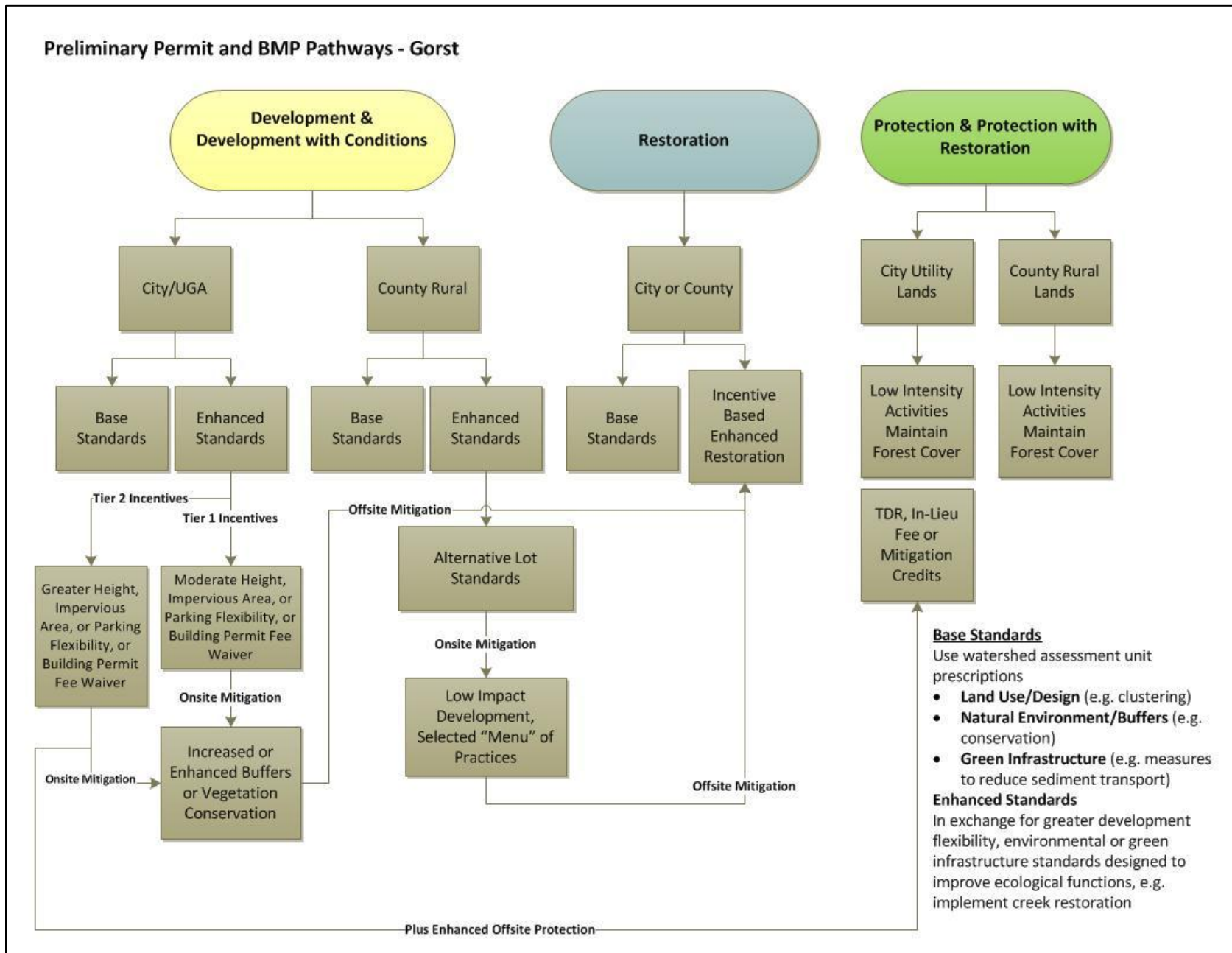
Analysis in Section 3.0 shows areas of the watershed that are more suited to less or more development and appropriate for restoration or protection. Section 4.0 shows there is infrastructure available to the urban areas in particular. Section 5.0 indicates that there is an alignment between watershed designations of "Development" and urban lands in the watershed. Based on present or alternative zoning described in Section 6.0 and evaluated in terms of land capacity in Section 7.0 there is a wide range of growth that can be studied in the urban areas. Some growth would also be anticipated in rural areas, though at a low intensity level.

Opportunities for growth provide opportunities to implement best management practices in terms of land use, restoration, and protection. As the Watershed Comprehensive Plan, associated Gorst Subarea Plan, and County/City regulations are prepared to reflect the various land use alternatives under study, a suite of land use management, habitat management, and green infrastructure measures will be tested. Exhibit 6 above describes the management measures conceptually. Exhibit 29 below illustrates how the management measures could be structured to facilitate development in the urban areas and provide incentives for restoration and protection.

As an example, within the Gorst UGA identified for "Development" base standards could allow three story commercial mixed use development provided that a basic set of zoning, urban design, critical area protection, and infrastructure levels of service are met. However, if an applicant wanted to build a six-story mixed use development, an enhanced set of habitat and green infrastructure standards could be applied such as a wider/enhanced buffer from shorelines or critical areas or an allowance for offsite mitigation and additional restoration in other portions of the watershed.

In Rural areas, standard stormwater requirements could apply to a basic rural subdivision. However, if an applicant wanted to place the same amount of density in a clustered pattern, the enhanced LID measures (a pre-selected set of measures) could be required, buffers could be enhanced, and offsite mitigation and restoration allowed.

Exhibit 29 Permit and Best Management Practices (BMP) Pathways



Source: BERK and Parametrix 2012

9.0 SWOT AND GUIDING PRINCIPLES

A “SWOT” analysis is an exercise that considers an area’s strengths, weaknesses, opportunities, and threats. Following the availability of the watershed characterization and inventory results the consultant team and agency partners developed a SWOT analysis (see Appendix A). Results show a variety of economic, land use, environmental, transportation, and infrastructure strengths and opportunities, as well as areas of weakness and threats where actions are needed. Based on these parameters, preliminary Guiding Principles were developed:

- Make Gorst a place to stop
- Facilitate development of economically valued land
- Identify and prioritize land that can be more intensely developed with less environmental consequences
- Promote green infrastructure for both new and existing facilities, such as by identifying areas to target for stormwater retrofits
- Support development incentives and evaluate options such as mitigation banking, transfer development rights (TDRS), and other tools
- Identify and protect critical areas
- Prioritize areas to be protected and restored
- Protect and enhance water quality/quantity for fish and wildlife habitat as well as for human use
- Create a cohesive and attractive urban character in the Gorst urban growth area (UGA) such as by improving building design, and creating and enhancing public spaces such as parks, pedestrian corridors and streetscapes
- Allow an environmentally sustainable pattern of forestry, low density residential, small scale employment, and recreation uses in the rural areas of watershed
- Improve transportation mode choices including transit, bicycle, pedestrian, and autos, recognizing local as well as regional travel needs

The Guiding Principles are meant to provide a vision, parameters, or essential ingredients that steer the preparation of the Land Use Plan. The principles are considered “draft” and will be tested and refined through public outreach efforts.

10.0 DRAFT WATERSHED PLAN OUTLINE

Laying the framework for the watershed plan, the consultant team has developed a draft plan outline. It shows the watershed plan as consisting of the following components:

- A watershed framework plan laying the foundation of the Watershed Characterization guidance for land uses and guiding principles,
- Subarea plan components for: Gorst UGA, City Utility and Golf Course Lands, and County Rural Lands, and
- Implementing Regulations for each Subarea

The draft outline is included in Appendix B. It is expected to change over time as the planning process proceeds, based on citizen and agency input and the needs of the City and County.

11.0 NEXT STEPS

This analysis report provides a connection between watershed conditions and land use planning. The information and recommendations in this analysis will lay a foundation for the development of land use alternatives that will be refined through a public scoping process and studied in a draft plan and EIS. It is expected that this early land use, environmental and infrastructure analysis will be augmented and updated as the planning and environmental review process moves forward.

The general steps in the process are anticipated as follows:

- Fall 2012: Public and agency scoping of EIS topics and potential alternatives
- Winter 2013: Draft Alternatives, Draft Plan, and Preliminary environmental review
- Spring 2013: Draft Plan and EIS Comment Period
- Summer 2013: Preferred Plan Development
- Fall 2012: Final EIS preparation and Legislative Meetings and Hearings

The City's website is an additional source of project information and should be referenced for schedule updates: <http://www.ci.bremerton.wa.us/gorstwatershed/doc.html>.

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Appendix A

Gorst Watershed SWOT Analysis and Guiding Principles, June 2012

GORST WATERSHED SWOT ANALYSIS AND GUIDING PRINCIPLES

June 2012

INTRODUCTION

The consultant team and agency partners have prepared a Gorst Creek Watershed Characterization Report addressing appropriate locations for development, ecological restoration, and ecosystem protection and conservation. An inventory map folio has also been prepared identifying natural and built environment conditions throughout the watershed. The completed analysis provides the basis for the land use planning process. The purpose of the land use planning process is to create a roadmap to allow for development of those areas that are least sensitive to development pressures from an ecological perspective, while protecting, restoring, and conserving land area that is critical to supporting ecological processes related to water flow within the basin. In addition there may be areas that have a moderate sensitivity to development but with best management practices can be sensitively developed with low environmental impacts. The Gorst Land Use plan therefore begins with a watershed inventory and analysis, which will become the underlying framework for the Gorst Land Use Plan. The first step in the land use plan process is to review the watershed inventory and analysis and develop both a *preliminary* “SWOT” analysis and *preliminary* guiding principles, both of which will be the subject of a public visioning workshop and advisory committee meeting.

Preliminary SWOT Analysis

A “SWOT” analysis is an exercise that considers the strengths, weaknesses, opportunities, and threats in the Gorst Watershed. The definitions of the terms are:

- Strengths (Positive, Internal): Positive attributes currently present in Gorst
- Weaknesses (Negative, Internal): Local issues or characteristics that limit the opportunities for Gorst
- Opportunities (Positive, Internal and External): Areas where Gorst can remedy its weaknesses (learning from others, state-level assistance, aggressive marketing, targeted investment, etc.)
- Threats (Negative, Internal and External): Trends that threaten Gorst’s future and attractiveness

Tables 1 through 4 on the following pages review strengths, weaknesses, opportunities and threats for the following topic areas:

- Economy: the prosperity or earnings of this place, including features that support a successful, flourishing, or thriving financial condition;
- Environment: natural ecological systems and resources

- Land Use, Open Space, and Recreation: human use and management of land including areas that have human-built structures offering places for living, working and leisure activities, and areas without structures that are accessible to the public
- Transportation, Public Services, and Utilities: the movement of people and goods in the area; services provided by governments to its citizens such as police, fire, parks, etc.; and the provision of water, wastewater, power, telecommunication, and other infrastructure providing services consumed by the public

Preliminary Guiding Principles

Guiding principles can be drawn from all the information developed to date including the SWOT as well as the Gorst Creek Watershed Characterization Report and Inventory Map Folio. The Guiding Principles are meant to provide a vision, parameters, or essential ingredients that steer the preparation of the Land Use Plan. The principles are draft and will be tested and refined through public meetings described above.

- Make Gorst a place to stop
- Facilitate development of economically valued land
- Identify and prioritize land that can be more intensely developed with less environmental consequences
- Promote green infrastructure for both new and existing facilities, such as by identifying areas to target for stormwater retrofits
- Support development incentives and evaluate options such as mitigation banking, transfer development rights (TDRS), and other tools
- Identify and protect critical areas
- Prioritize areas to be protected and restored
- Protect and enhance water quality/quantity for fish and wildlife habitat as well as for human use
- Create a cohesive and attractive urban character in the Gorst urban growth area (UGA) such as by improving building design, and creating and enhancing public spaces such as parks, pedestrian corridors and streetscapes
- Allow an environmentally sustainable pattern of forestry, low density residential, small scale employment, and recreation uses in the rural areas of watershed
- Improve transportation mode choices including transit, bicycle, pedestrian, and autos, recognizing local as well as regional travel needs

TABLE 1. ECONOMY

Strengths	Weaknesses
<ul style="list-style-type: none"> • Watershed recreation opportunities: trails, fishing, shellfishing, golf course, park • Waterfront development opportunities: Waterfront development will increase land value and is developable with aesthetics • New sewer, water, and power infrastructure decreases developer cost • Land is inexpensive <ul style="list-style-type: none"> ◦ Existing land use is ripe for redevelopment • Location near other job hubs: Located near SKIA, airport, and Puget Sound Naval Station (PSNS), creates a need for residential/commercial to support jobs/industrial • Through point for all persons heading to the Peninsula • As a nexus point, the highway frontage of SR 3 connects Bremerton, Shelton, Gig Harbor, Tacoma, SKIA, PSNS, and Bainbridge Island • Pass through traffic - opportunity to attract customers if providing desirable commercial, mixed use • Ecosystem services - such as natural recharge potential reduces costs to engineering clean water • Bremerton has excellent reputation as “can do” with developers 	<ul style="list-style-type: none"> • Limited access due to topography near water • Stigma – Gorst is synonymous with traffic congestion, unattractive buildings, and seedy highway commercial retail • Low population • Low income households • Significant critical areas (hard to develop large land areas): steep slopes, rivers, wetlands, poor soils in the low lands and bedrock in the uplands, potential increase in structural costs • Utilities • Lack non-motorized access and parking to the waterfront • Blighted current conditions negatively impacts development • Limited / poor transportation
Opportunities	Threats
<ul style="list-style-type: none"> • Enhance marine waterfront and protect forestlands by low impact development (LID), and development incentives: <ul style="list-style-type: none"> ◦ Enhance salmon habitat and water quality • Reduce commuter trips by providing both short-term (hotels) and long-term (apartment/houses) housing plus commercial to support this use • Frontage road to improve traffic • Change image by streetscape corridor enhancements, design standards, and annexation • Through new development, and job and housing opportunities, increase incomes, property values, and tax base • Cluster development in economically high value areas to protect underdeveloped areas • Consider tax incentives for new businesses that locate in Gorst (e.g. reduced or no B&O taxes; lesser hotel/motel taxes) 	<ul style="list-style-type: none"> • Further degradation of marine waterfront by development or inaction • Traffic issues prevent planned/desired development • Urban decay or image cannot be overcome to sustain development • Inability for jurisdictions to agree on regulations/zoning • For ecologically-valued properties, owners may protest ecological classification • Economy stays depressed long-term • Will watershed plan limit opportunities for developing City utility lands in the future? • State transportation improvements could reduce developable property

TABLE 2. ENVIRONMENT

Strengths	Weaknesses
<ul style="list-style-type: none"> • Watershed supports variety of terrestrial and aquatic habitats including wetland, riparian, estuarine, and forest habitats • Undeveloped character: The watershed is mostly undeveloped • City ownership of forested watershed: City owns/operates most land as forest; the forest habitat blocks in City ownership are in the top 10 percent for importance in Puget Trough Ecoregion • High value land is less constrained: Perceived highest economic land has lower ecological value • High recharge value 	<ul style="list-style-type: none"> • Existing marine areas, stream corridors, and other habitat may continue to degrade as development/infill continues • Complexity of federal, state, and local permitting • Environmental Hazardous, Toxic and Radioactive Waste “HTRW's” on waterfront and within the system (e.g. landfill).
Opportunities	Threats
<ul style="list-style-type: none"> • Identify and prioritize land that can be more intensely developed with less environmental consequences • Innovative techniques under the Growth Management Act, e.g. clustering, mitigation banks, TDR (if there are development rights to transfer within the watershed or other areas of unincorporated Kitsap County) • Create a code that incentivizes development in areas with lower ecological value • New sewers can reduce impacts of existing remaining septic systems • Re-forest degraded forest area • Stormwater retrofits including low impact development techniques • Change perceptions about green being expensive through education and outreach; show it is demonstrably cheaper to rely on existing ecological processes than to try to pay to replace them • Create a programmatic permit approach – develop a streamlined permitting approach, which identifies and prioritizes mitigation opportunities in advance, and steers development towards less environmentally sensitive areas. 	<ul style="list-style-type: none"> • Costs of environmental improvements such as stormwater retrofits, landfill remediation, and stream and wetland enhancements • For ecologically-valued properties, owners may protest ecological classification • Perception that green is expensive • Haphazard development

TABLE 3. LAND USE, OPEN SPACE, AND RECREATION

Strengths	Weaknesses
<p>In addition to economic strengths:</p> <ul style="list-style-type: none"> • There is land capacity: Mostly undeveloped or under-developed land • Views of water could be attractive for new housing opportunities • Commercial uses attracted by large volume of traffic • Existing recreation – Otto Jarstad Park and golf course • Shoreline Master Program promotes public access to waterfront 	<ul style="list-style-type: none"> • Unattractive corridor commercial area: Urban area has many older outdated structures, confusing street system, lacks streetscape, and lacks a sense of place and human scale (no pedestrian access to waterfront) • Little residential uses to provide stability and complete community • Existing businesses could inhibit adjacent redevelopment • Some underperforming and unattractive existing businesses will be grandfathered in • Land capacity and economic analysis is not complete – unknown information and uncertainty of success • Development restricted by environmental conditions and high ecological value, based on Watershed Characterization report and environmental stewardship • Stigma
Opportunities	Threats
<ul style="list-style-type: none"> • Create a land use plan that addresses a complete community including housing, jobs, and recreation over the life of the plan • Create policies and development standards that promote compatible development and transitions from higher to lower intensity uses • Create design guidelines in Gorst UGA to create quality development and attract investment; add incentives for new business owners to remodel • Design planned action ordinance to facilitate permitting speed and decrease risk • Demonstrate green development is cost effective through education and outreach • Increased value of land may motivate existing non-conforming to sell or change use • Improve environment through implementation of innovative techniques such as TDR or mitigation banking, tax incentives, Corrective Action Plan implementation, and future smart development <ul style="list-style-type: none"> ○ TDR's could include infrastructure improvements • Meet GMA goals by protecting critical areas and clustering development • Complete streets approach with multiple modes and streetscapes • Added parks and open space could be identified along waterfront as part of shoreline public access and in the broader watershed to promote education, healthy active lifestyles, and ecological conservation 	<ul style="list-style-type: none"> • Perception that green is expensive • Inability for jurisdictions to agree on regulations/zoning • No one else shows up which decreases opportunity • Third party lawsuits due to land use restrictions • State transportation improvements could reduce developable property

TABLE 4. TRANSPORTATION, PUBLIC SERVICES, AND UTILITIES

Strengths	Weaknesses
<ul style="list-style-type: none"> • As a nexus point, the highway frontage of SR 3 connects Bremerton, Shelton, Gig Harbor, Tacoma, SKIA, PSNS, and Bainbridge Island. • New sewer, water, and power infrastructure decreases developer cost • Reasonable utility rates 	<ul style="list-style-type: none"> • Limited / poor transportation <ul style="list-style-type: none"> ○ Very low level of service due to large amount of vehicular traffic and less transit service ○ High cost, long time-frame to improve level of service ○ Lack of rail ○ Low priority to resolve • Ecologically costly improvements proposed by WSDOT
Opportunities	Threats
<ul style="list-style-type: none"> • Add non-motorized access along shoreline, and secondary roads such as West Belfair Valley Road to strengthen multiple modes and recreation opportunities • Extend urban utilities to full UGA • Develop low impact development standards and stormwater retrofit program • New sewers can reduce impacts of existing remaining septic systems • Identify future alternative roadway bypass network to calm other major routes and create opportunities for local circulation • Complete streets approach with multiple modes and streetscapes • Seek opportunities to increase transit by partnering with Kitsap Transit such as seeking a park and ride location 	<ul style="list-style-type: none"> • Adding more growth could exacerbate traffic flow concerns

Appendix B

*Gorst Creek Watershed Comprehensive Plan,
Plan and Regulatory Outline, October 2012*

GORST CREEK WATERSHED COMPREHENSIVE PLAN

Plan and Regulatory Outline

I. WATERSHED

- A. Introduction and Purpose**
- B. Planning Process & Public Involvement**
- C. Watershed Characterization**
 - 1. Summary of Watershed Assessment**
 - 2. Watershed Recommendations**
- D. Planning Concepts**
 - 1. Watershed Protection, Restoration and Development Zones**
 - 2. SWOT**
 - 3. Guiding Principles**

II. GORST UGA

- A. Vision Statement**
- B. Goals and Policies**
- C. Land Use Plan**
- D. Urban Design Concepts**
- E. Annexation and Service Delivery Strategies**
- F. Best Management Practices/Permit Pathways**
- G. Zoning Code & Design Guidelines (Appendix)**

III. CITY UTILITY AND GOLF COURSE LANDS

- A. Vision Statement**
- B. Goals and Policies**

C. Best Management Practices/Permit Pathways

D. Zoning Code (Appendix)

Possible concepts: Adjustments to land uses? TDR, PDR, In-Lieu Fee, Mitigation Banking, GHG Sequestration, etc.?

IV. COUNTY RURAL LANDS

A. Vision Statement

B. Goals and Policies

C. Land Use Plan

Assumption: Generally retain current land use designations

D. Urban Design Concepts

Possible concepts: Rural residential clustering and low impact development, incentives for restoration

E. Best Management Practices/Permit Pathways

F. Zoning Code & Design Guidelines (Appendix)

CODE OUTLINES

City and County Code Outlines

CITY CODE OUTLINE

Discuss format: Traditional Code or Hybrid Traditional with Form Based Code elements?

Intent

Permitted Uses

Conditional Uses

Development Standards

Design Standards [Integrate Design Guidelines]

Parking Requirements

Landscaping Requirements [Integrate Design Guidelines]

Sign Standards [Integrate Design Guidelines]

COUNTY CODE OUTLINE

Purpose

Uses (amend use matrix as needed)

Height Regulation (amend development standards as needed)

Lot Requirements (amend development standards as needed)

Signs

Off-street Parking and Loading

Landscaping [Integrate Design Guidelines]

Other Provisions [Integrate Design Guidelines]

