

May 22, 2023

City of Poulsbo Planning and Economic Development Department
200 NE Moe Street
Poulsbo, WA 98370

RE: 2024 Comprehensive Plan Update – EIS Scoping request for Comments

Dear Planning Department,

As part of the 2024 Comprehensive Plan Update process, I am responding to the EIS Request for Comments notice of April 14, 2023 and offer the following.

The Alternates proposed to be studied appear to be limited to residential growth and the SR-305 Corridor. I believe there are other considerations that should be included:

1. The Scoping list provided in the Notice does not specifically include the topic of addressing impacts to documented Critical Areas. The upcoming EIS should include impacts of the Comprehensive Plan on documented Critical Areas including: Current Figure CAO-1 Wetlands Critical Area Map, Hydric Soils & Delineated Wetlands, Figure CAO-2 Fish & Wildlife Habitat Conservation Areas DNR Hydrology Water Type Map, CAO-3 Fish and Wildlife Conservation Areas, CAO-4 Southfork Dogfish Creek Reach Map, COA-5 Geological Hazard Areas Map, and CAO-6 Aquifer Critical Area Map
2. I request this include impacts of existing proposed and new proposed roadways that are or will be included in the current Comprehensive Plan and the 2024 Comprehensive Plan update to documented Critical Areas, including specifically current Comprehensive Plan Appendix B-4, Final Transportation Plan Update - 2016, Table 13: Figure TR-3 new road N-8, 12th Ave Extension and new road N-13, New Road "Z" from Forest Rock Lane to 10th Avenue.
3. I also request the EIS consider, in addition to proposed "Alternate 1 No Action, Current Adopted Plan" to consider an additional Alternate, the "Consequences of Doing Nothing" and consider alternate mitigation techniques of doing nothing.
4. The proposed Alternate 1 "Current Adopted Plan" suggests to me the current plan is assumed vested as acceptable when new information, such as updates to Critical Area maps, for example, may reveal new impacts to the current adopted plan. "The Current Adopted Plan" should be re-evaluated in light of current information.
5. In the case of proposed new road N-8, I also request the EIS consider the impact to Comprehensive Plan stated Goals and Policies to preserve and expand parks and open spaces, and the adopted Poulsbo Parks Recreation and Open Space Plan 2021-2027 Goals and Policies including Table 5-1 which shows an existing deficiency in Neighborhood Park space based on the 2036 Planned Level of Service of 9.64 acres, or 33%. Eliminating park space would make this deficiency even worse.

I appreciate your thoughtful consideration and look forward to reviewing the draft EIS.



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