



FISHERIES DEPARTMENT

Area Code (360)

394-5248

Fax 598-4666

THE SUQUAMISH TRIBE

P.O. Box 498

Suquamish, Washington 98392

FAX TRANSMISSION SHEET

Fisheries Fax #: (360) 598-4666

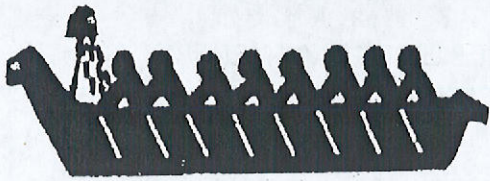
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KITSAP COUNTY DEPT OF
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FROM: Dawn Pucci

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THE SUQUAMISH TRIBE

P.O. Box 498

Suquamish, Washington 98392

June 25, 2003

County Commissioners
c/o Karen Ashcraft
614 Division Street, MS-36
Port Orchard, WA 98366

Re: 2003 Comprehensive Plan amendments concerning Interim Rural Forest Zoning

Dear County Commissioners,

The Suquamish Tribe is concerned with the sustainability of fish and shellfish and their habitat. The Tribe is federally recognized as co-managers (with Washington Department of Fish and Wildlife) of fisheries resources within their usual and accustomed fishing areas (U&A area). The Tribe currently enhances the Puget Sound fisheries for all—tribal, non-Indian commercial, and sports fishing—and has had strong support from groups enabling a quality enhancement fisheries program. The Tribe not only has the right to fish but also the right to preserve and maintain the resource. Thus, our standard for review is based on the protection and maintenance of resources.

The Tribe was involved in the stakeholders' advisory committee that discussed the future of Interim Rural Forestlands (IRF). The last two of three committee meetings were comprised of 66% land owners, developers, real estate representatives and property rights campaigners, 18% county employees and neutral parties, and 16% tribes, environmental and ecological interests. The original intent of Phase II of the forestry review process was to "...discuss and recommend a potential program for encouraging forestry activities within rural areas." (Kitsap County 1998) However the group focused solely on discussing a program that would encourage conversion of forestland for the purposes of clustered rural residential development. The tribe supports clustered developments (urban densities in urban growth areas and rural densities in rural areas), however, the priority for this committee should be to develop programs that enable forest landowners to continue the practice of sustainable forestry. The comprehensive plan directive allows for "clustered residential development at appropriate densities" as part of the program to be developed. Therefore, it is worth discussing at this time what the committee came to consensus on and what was disagreed upon and why.

The committee did agree that:

- 1) if development was to occur that it should be done with an incentive based program and that it should be clustered;
- 2) that the critical areas ordinance should not be undermined with this program; and
- 3) if the program is not applied to 100% of interim rural forest lands, then a program should be implemented that would distribute the program fairly among all landowners with interim rural forestlands so that it was not simply a "first come, first served" situation.

The committee did not agree on the following points:

- 1) the percent of land that the program should be applied to (The Tribe does not support applying the program to 100% of the interim rural forestlands without knowing the effect

on the landscape (i.e. cumulative effects); all expensive, extensive and potentially impactful research is performed at a smaller scale first – a pilot study – so that minor modifications may be made as necessary before applying the program or research to a large area;

- 2) the planning horizon for the area set aside as forestland. Twenty years was part of the original Rural Wooded Incentive Program (RWIP) that was proposed but rejected in 1996. The Tribe supports a longer time frame. If the land is put into a reserve for 40 –50 years, time will be available to possibly discover new development and building technologies to lessen impacts. The topic of length of time for the set aside area was not fully discussed;
- 3) a shorelines proposal that involved clustering with bonus densities . It was decided that a shorelines program should be applied to all shorelines, not just those zoned as IRF. A shorelines program warrants separate discussion so that a workable program can be developed and proposed;
- 4) a permanent openspace designation within the program was discussed without reaching a final agreement. The original RWIP required 25% of the land that enters the program be designated permanent openspace. This commitment was dropped in the latest discussions to attempt to accommodate a greater amount of land be put into long-term forestry. Other options and details regarding openspace were briefly mentioned but not explored due to a lack of time.

The largest disagreement arose from the density allocations for the clustered areas. One side wanted a density increase from 1 dwelling unit/ 20 acres (current IRF zoning) to 1du/5a. The Tribe does not support a density increase of 400% in the rural areas. An abundance of evidence states that increasing densities in the rural areas leads to increases in impervious surfaces and degradation of natural resources. The Center for Watershed Protection (CWP) found more than 225 research studies that document the impact of urbanization on hydrologic, physical, water quality and biological indicators (2003). The study, along with the article titled "Impervious Surface Coverage: The emergence of a key environmental Indicator" (Arnold and Gibbons 1996) has a good summary of cited literature that details the impact of increased impervious surface area and loss of forest cover, including increased flashiness of stream flows, depleted aquifer recharge (which depletes amounts of drinking water), and alterations in stream channel structure. Several studies found that to maintain a high quality watershed, the amount of impervious surfaces needs to be at or below 10% and forest cover at a minimum of 65% (Booth 2000; Arnold and Gibbons 1996; Booth and Jackson 1994; Booth and Reinelt 1993). Schueler (1995) cited an example of the impact of impervious surface runoff amounts: during a one inch rainstorm on a one acre meadow, the total runoff of storm water would fill an average size office to a depth of about 2 feet. If the meadow was paved, the same rainfall would completely fill the same office as well as the two next to it. If forestland is converted to grass, such as the above meadow, the annual volume of surface runoff and interflow increases 117% (Beyerlein 1996). In forestland, almost half of the rainfall is evapotranspired and doesn't result in any runoff at all (Beyerlein 1999). Much of this literature was made available to the committee during the meetings.

Maintaining forest cover is as important as reducing amounts of impervious surfaces. To this end, the Tribe supports developing a program to assist forestland owners in maintaining a viable forest industry in Kitsap County. Conversion of this land should be a last resort only. Unfortunately, how the land is converted was the main discussion of the steering committee. A lot more work must go into this program development if it is to meet the needs of all Kitsap citizens – forest landowners, water users, and downstream landowners alike.