



CITY OF
BAINBRIDGE ISLAND

**CITY COUNCIL STUDY SESSION
TUESDAY, DECEMBER 03, 2024**

COUNCIL CHAMBERS
280 MADISON AVENUE NORTH
BAINBRIDGE ISLAND, WA

AND

REMOTE MEETING ON ZOOM
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AGENDA

1. **CALL TO ORDER / ROLL CALL - 6:00 PM**
2. **APPROVAL OF AGENDA / CONFLICT OF INTEREST DISCLOSURE - 6:05 PM**
3. **REGULAR BUSINESS**
 - 3.A **(6:10 PM) Review Council Comments on the Winslow Subarea Plan and Comprehensive Plan Updates - Planning**, 90 Minutes
[Combined Council Comment \(Annotated\).pdf](#)
[Council Comments Organized by Topic.docx](#)
[Questions for Council on Comp Plan Preferred Alternative.docx](#)
4. **COMMITTEE REPORTS - 7:40 PM**
5. **ADJOURNMENT - 7:50 PM**

GUIDING PRINCIPLES

Guiding Principle #1 - Preserve the special character of the Island, which includes downtown Winslow's small town atmosphere and function, historic buildings, extensive forested areas, meadows, farms, marine views and access, and scenic and winding roads supporting all forms of transportation.

Guiding Principle #2 - Manage the water resources of the Island to protect, restore and maintain their ecological and hydrological functions and to ensure clean and sufficient groundwater for future generations.

Guiding Principle #3 - Foster diversity with a holistic approach to meeting the needs of the Island and the human needs of its residents consistent with the stewardship of our finite environmental resources.

Guiding Principle #4 - Consider the costs and benefits to Island residents and property owners in making land use decisions.

Guiding Principle #5 - The use of land on the Island should be based on the principle that the Island's environmental resources are finite and must be maintained at a sustainable level.

Guiding Principle #6 - Nurture Bainbridge Island as a sustainable community by meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Guiding Principle #7 - Reduce greenhouse gas emissions and increase the Island's climate resilience.

Guiding Principle #8 - Support the Island's Guiding Principles and Policies through the City's organizational and operating budget decisions.



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CITY OF
BAINBRIDGE ISLAND

City Council Study Session Agenda Bill

MEETING DATE: December 3, 2024

ESTIMATED TIME: 90 Minutes

AGENDA ITEM: (6:10 PM) Review Council Comments on the Winslow Subarea Plan and Comprehensive Plan Updates - Planning,

SUMMARY: In conformance with the City Council's request, Council members submitted their comments and observations with regard to the Comprehensive Plan and Winslow Subarea Plan for Council review and response. This packet contains the original comments provided by four members of the Council, and a table organizing the comments into key topic areas with staff responses.

Finally, based upon the comments raised by the communication received by the Council, council members will respond to policy perspectives.

AGENDA CATEGORY: Discussion

PROPOSED BY: Planning & Community Development

RECOMMENDED MOTION: Provide Council direction.

COMMUNITY ENGAGEMENT AND OUTREACH: monthly updates to city council on plan updates and alternatives; over two dozen outreach events on plan alternatives; videos, a podcast and media articles

FISCAL IMPACT:

Amount:	
Ongoing Cost:	
One-Time Cost:	
Included in Current Budget?	

BACKGROUND: Since early 2024, City Council received monthly briefings on the Comprehensive Plan and Winslow Subarea Plan update projects. During those months, council members discussed plan alternatives for Winslow and for the rest of Bainbridge Island; learned about expanded scoping topics for an environmental impact statement (EIS), and about the analysis of the alternatives for both plans in the draft impact statement.

Based on their experience and involvement in this work, council members submitted their own lists of questions and concerns for staff response. This will be the focus of tonight's study session. The study session will include a set of ten questions based on those lists to aid in development of a preferred alternative.

During the 77-day open public comment period of the draft EIS, the City received public comments and conducted outreach events. The City Council will hear a presentation on the public comments at the City Council regular business meeting on December 10, 2024.

Based on tonight's study session and on the December 10th presentation on the public comments, policy direction on a preferred alternative is expected.

The policy direction will guide the Planning Commission's work on a preferred alternative. The preferred alternative will be the basis on which updates to the Comprehensive Plan and Winslow Subarea Plan will be drafted for public review and comment. The preferred alternative, draft plan updates and responses to public comments will be analyzed in a final environmental impact statement (FEIS). A public review period of the FEIS will follow, inviting review and comment on the draft plan updates and FEIS.

The updates to the Winslow Subarea Plan and Comprehensive Plan are expected to be completed by June 2025.

ATTACHMENTS:

[Combined Council Comment \(Annotated\).pdf](#)

[Council Comments Organized by Topic.docx](#)

[Questions for Council on Comp Plan Preferred Alternative.docx](#)

FISCAL DETAILS:

Fund Name(s):

Coding:

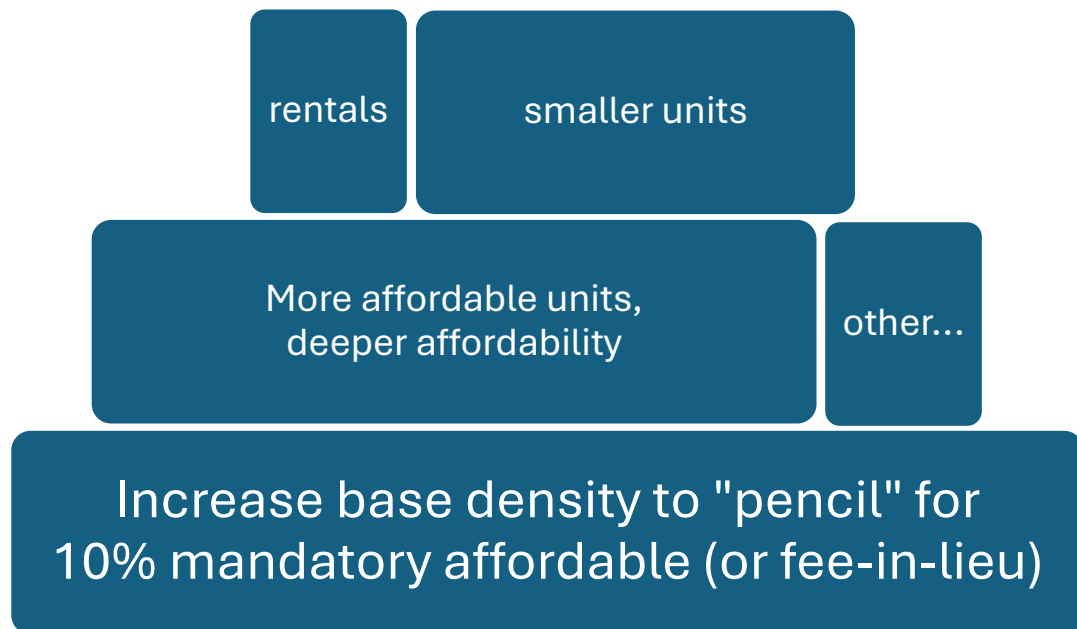
Comp Plan Policy Preferences (CM Schneider)

Island-wide, including Neighborhood Centers and Conservation Area

- | | |
|---|----------------------------|
| 1. increasing the number of allowable ADUs to 2 and reduce barriers for ADUs | 1
Housing
Diversity |
| 2. Allowing existing homes to be subdivided into multiple units. | |
| 3. Convert units-per-acre to FAR or form-based code, based on an average building size of nearby homes. | |
| 4. For 100% affordable housing units for <80% AMI: This target will only be met by subsidized development, including land donations. For projects meeting criteria of 100% affordable, offer bonus FAR and other bundled incentives (equivalent to religious property exemption given to Bethany Lutheran?) for any residential zone. | 2
Affordable
Housing |

Winslow: combination of Alt. 2 and Alt. 3

- | | |
|---|-------------------------------------|
| 1. Expand Winslow boundaries to include the sewer district, as in Alt. 3 (OK to exclude Wing Point). | 3
Winslow
Boundary |
| 2. Get rid of minimum parking requirements and let developers decide how much parking they must offer in order to rent/sell their units. | |
| 3. One of our mandated targets is 278 additional units of affordable housing for 80-120% AMI . This target range should be achieved by market development with mandatory and incentivized affordable units. This requires creating greater overall capacity in Winslow, but keeps that capacity under 4000 units. | 4
Parking/
Implementat
ion |
| <ul style="list-style-type: none"> a. Increase base FAR across Winslow to make it feasible, profitable, and mandatory for market development to provide 10% of units in any project that are affordable for 80% AMI (or pay a fee in lieu). b. Offer additional density for additional affordable units, or greater affordability. c. Offer additional density or other incentives for other community housing needs, such as rentals, or smaller unit sizes. | |
| | 5
Affordable
Housing |
| | 6
Housing
Diversity |



- | | |
|---|--|
| 4. Incentivize redevelopment in the Ferry Terminal and High School Road districts for re-purposing or upgrading existing uses, to be designed as desirable, walkable neighborhoods that include mandatory and incentivized affordable housing. | 7
Winslow |
| | 8
Winslow/
Affordable
Housing |

Jennifer Sutton

From: HB Harper
Sent: Monday, October 21, 2024 9:48 AM
To: Peter Best; Jennifer Sutton
Subject: FW: Providing requests for the budget and comments for the Comprehensive Plan

From: Joe Deets <jdeets@bainbridgewa.gov>
Sent: Thursday, October 17, 2024 10:28 AM
To: Blair King <bking@bainbridgewa.gov>
Cc: James Haney <jhaney@bainbridgewa.gov>; Ellen Schroer <eschroer@bainbridgewa.gov>; DeWayne Pitts <dpitts@bainbridgewa.gov>; Patricia Charnas <pcharnas@bainbridgewa.gov>; HB Harper <hharper@bainbridgewa.gov>; Roz Lassoﬀ <rlassoﬀ@bainbridgewa.gov>
Subject: RE: Providing requests for the budget and comments for the Comprehensive Plan

Blair,

Following up on your request below for written comments regarding the Comprehensive Plan up-date, I can provide the following.

I am happy to give the Planning Commission wide latitude to review the DEIS and come back to Council with its recommendations. But I preface this by saying that we, representatives of the City, cannot disregard the moral, legal, and economic responsibility that we have to increase the availability of affordable housing on Bainbridge Island. And what we do agree to take on in respect to growth must not push us beyond what is sustainable environmentally or economically.

- 1 Affordable Housing
- 2 Environ.
- 3 Capital Facilities

This of course will not be easy but I will be looking for a recommendation from the Planning Commission that meets both of these objectives.

Best regards,

Joe

Joe Deets
City of Bainbridge Island Mayor and District 7, North Ward Councilmember
E-mail: jdeets@bainbridgewa.gov
Mobile: 206-473-1864
Council Office Hours Schedule: www.bainbridgewa.gov/JoeDeets

From: Blair King <bking@bainbridgewa.gov>
Sent: Friday, October 4, 2024 1:56 PM
To: City Council Distribution Group <CityCouncilDistributionGroup@bainbridgewa.gov>
Cc: James Haney <jhaney@bainbridgewa.gov>; Ellen Schroer <eschroer@bainbridgewa.gov>; DeWayne Pitts <dpitts@bainbridgewa.gov>; Patricia Charnas <pcharnas@bainbridgewa.gov>; HB Harper <hharper@bainbridgewa.gov>; Roz Lassoﬀ <rlassoﬀ@bainbridgewa.gov>
Subject: Providing requests for the budget and comments for the Comprehensive Plan

Honorable Mayor and Council:

At your upcoming Council meeting this Tuesday, October 8, the 2025-2026 biennium budget will be reviewed. If you have requests for changes to the budget, please be prepared to share and review them with your colleagues at Tuesday's meeting. The suggested changes will be preliminary reviewed on the 8th, with the intention of reviewing and finalizing changes on October 22. Adoption of the final budget is tentatively scheduled on November 12, with December 10 as the back-stop date.

At Tuesday's Study Session, the Council expressed interest in providing the city manager comments for the Comprehensive Plan update. Please provide your written comments to me by Friday, October 18. Staff will assembly the comments for review at the November 5 Study Session.

Again, please bring your request for changes for the budget to Tuesday's regular meeting, and provide you written comments for the Comprehensive Plan update by Friday, October 18.

Blair



Blair King

City Manager

www.bainbridgewa.gov

facebook.com/citybainbridgeisland/

206.842.2545 (office/remote)



This is a public document and may be made available to a third party upon request

Jennifer Sutton

From: HB Harper
Sent: Tuesday, October 22, 2024 2:35 PM
To: Jennifer Sutton; Peter Best
Subject: FW: Alternatives--sorry so late!

From: Blair King <bking@bainbridgewa.gov>
Sent: Tuesday, October 22, 2024 2:29 PM
To: HB Harper <hharper@bainbridgewa.gov>; Patricia Charnas <pcharnas@bainbridgewa.gov>
Subject: FW: Alternatives--sorry so late!

Here are some comments from Ashley. Thank you

From: Ashley Mathews <amathews@bainbridgewa.gov>
Sent: Tuesday, October 22, 2024 2:26 PM
To: Blair King <bking@bainbridgewa.gov>
Subject: Alternatives--sorry so late!

Hi Blair,

Winslow

-Achieve affordable housing through a mixture of alternatives 2 and 3

Leave Rolling Bay, Island Center and Lynwood alone except Lynwood Center allow for increase FAR for existing parcel (Blossom parcel)

Consult Island Center group

Find ways to protect agricultural lands

Loosen ADU regulations to also use conservation areas to achieve targets

- 1 Winslow & Affordable Housing
- 2 Neighborhood Center
- 3 Natural Resources/ Agriculture
- 4 Housing Diversity

Ashley Mathews

Councilmember-South Ward District 6

www.bainbridgewa.gov

206-949-7413 Direct



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TO: City Manager Blair King, for Planning Director and Staff

CC: Mayor Joe Deets and Deputy Mayor Ashley Mathews

FROM: Council Member Jon Quitslund

Here are my thoughts on several topics related to the Draft Environmental Impact Statement and the work ahead of us, in collaboration with Planning staff and the Planning Commission, on the Winslow Subarea Plan and the Comprehensive Plan. I am looking forward to the discussion on Nov. 5, and further decision-making later in the process.

#1: On more than one occasion, I have called upon the Council and Planning staff to give thoughtful attention to **GOAL LU-14** in the Land Use element: “Develop *context-sensitive* regulations for residential development in areas designated R-2, R-1 or R-0.4, in order to limit clearing [and] soil disturbance, promote *low impact development*, and **reconcile** development and conservation” (emphasis added).

To *reconcile* means “to bring into agreement or harmony; to make compatible or consistent.” Such a sense of purpose might guide our comprehensive planning not only in the least-dense zones, but Island-wide. Does the Council agree that this **goal** for land use policies and practices is legitimate, and worth pursuing in implementation of the Land Use, Environmental, and Housing elements of the 2024 Comprehensive Plan?

If so, we should ask the Planning Commission and Planning staff to strengthen policy statements in the 2024 Comprehensive Plan, to be consistent with this intention. Phrases such as “context-sensitive” and “low impact development” should be defined, and Municipal Code revisions will be needed in due course, in accordance with recommendations in the Housing Action Plan.

#2: According to the DEIS, there are three distinct portions of the Island that need to be planned for, separately and as a totality:

- A. The Winslow subarea, however its boundaries are defined;
- B. Neighborhood Centers and Business/Industrial designations;
- C. The Conservation Area.

I will comment on the three portions of the Island in turn, as they are dealt with in the DEIS and in comments received during the Public Engagement period.

A: Winslow. It is generally agreed that, in order to accommodate a population increase and a greater diversity of household incomes over the course of the next 20 years, zoning rules and development regulations need to be revised to allow for higher-density development and more housing, especially in multi-family housing types, throughout the mixed-use town center and the residential zoning districts.

Where the development of two “action alternatives” tests the feasibility of the work done in earlier stages of the Winslow Subarea Plan update, the DEIS clarifies several choices that must be made, but a lot of ground-truthing remains to be done at neighborhood levels. I expect that the updated Winslow Subarea Plan will identify some neighborhoods and zoning districts where little or no

1
Implementation/
Conservation
Area

2
Winslow &
Housing
Diversity

change in the development pattern is anticipated, and other areas where change (infill and/or re-development) is anticipated.

The DEIS tells us very little about where multi-family housing of different types for different income levels should be provided for. (On a large scale this would be too much to expect, but I think that some examples should be identified before we settle on a Preferred Alternative for Winslow.) I have spent hours studying the DEIS alternatives for Winslow and I still can't visualize significant differences between Alternatives 2 and 3, except that the boundaries are obviously different.

3
Winslow

B: Neighborhood Centers. Alternative plans for the Neighborhood Centers and Business/Industrial districts are important features of the two "action alternatives," and they propose some surprising and controversial changes, especially in Lynwood Center, Island Center, and Rolling Bay. In the short term, where the DEIS proposes expansion of the Center boundaries, my reaction is, "What's the rush?"

I believe that no binding decisions on changes to the boundaries of the Neighborhood Centers should be made at this time. A coordinated and thorough subarea planning process is needed for each of the three NCs, and I don't think that is feasible until 2026 at the earliest. Some specific decisions affecting existing business interests and pending plans could be made without waiting for completion of the Comprehensive Plan.

4
Neighborhood
Centers (NC)
& Subarea
Planning

As described in the BIMC, the process for modifying boundaries, uses, and development standards for a neighborhood center has been shown to be dysfunctional, although the persistent efforts devoted to planning for Island Center resulted in some decisions that could be acted upon without further delay.

I will vote for the "No Action" alternative on all of the designated centers outside of Winslow. At the same time, I think that the 2024 Comprehensive Plan should establish a goal and policies for achieving a certain amount of housing for income-qualified individuals or households, within the boundaries or in the vicinities of the Neighborhood Centers. Similarly, there should be a goal for new jobs based in the Centers.

5
NCs and Day
Road B/I area

C: The Conservation Area. When the scope of the DEIS was determined, a sharp distinction was made between Winslow and the other designated centers, currently occupying 8.9% of the Island's land mass, and all the rest of the Island, which is referred to as a "Conservation Area." The DEIS does not anticipate any changes to zoning and development regulations in this "remainder," although it is home to well over half of the Island's current population. With current zoning, the capacity exists for approximately 4,000 more residents. Setting aside most of the Island's buildable lands in a "No Action" alternative was a policy decision that simplified the scope of the DEIS, but at a cost. That short-sighted decision should be addressed during revision of the Land Use, Housing, and Environmental elements of the Comprehensive Plan.

6
Housing
Diversity/
Conservation
Area

Of course, high-priced single-family homes will continue to be built in the Conservation Area, and older homes will be sold at prices that are guaranteed to continue appreciating. The Conservation Area will continue to be a place where younger couples and families with children want to live, but for decades we have more or less deliberately limited access. The City could, without endangering

environmental values, make parts of the Conservation Area more inclusive, more diverse and equitable.

6
Housing
Diversity/
Conservation
Area
cot'd

The DEIS recognizes that the Conservation Area contains some potential for affordable housing in ADUs. I believe that duplex designs for moderately priced housing should be permitted, provided that the footprint resembles that of a typical single-family house. The Housing Action Plan's recommendation of co-op housing (HAP p. 137, Action 4.3) should be noticed in the Comprehensive Plan's policies.

#3: The City Council ought to discuss the pros and cons of designating a portion of Winslow as a **Candidate Countywide Growth Center**.

7
Countywide
Growth Center

#4: According to the DEIS, the steps taken in Alternatives 2 and 3 to allow higher density development in both the FAR-based zoning districts and some of the units-per-acre zones will create **more population capacity than Bainbridge Island is required to plan for at this time**. The differences seen on page 1-8 are dramatic. The Housing target is approximately 2,000 units, and Alternatives 2 and 3 show capacities either above or slightly below 5,000 units. Similarly, the Population target is approximately 4,500 people, and Alternatives 2 and 3 show capacities above 11,000 people.

8
Affordable
Housing

Do these discrepancies indicate that the proposed alternatives involve higher density development than we need? Perhaps so, and in that case the fine-tuned Preferred Alternative could cancel or reduce some of the proposed density increases, and/or tighten the boundaries that define the Winslow subarea.

One big question is, how much of the Housing and Population targets (and how much of the required housing for income-qualified households) do we want to locate in Winslow? According to the capacity analysis, Winslow alone will have enough capacity: 2,868 units in Alt. 2, and 2,386 units in Alt. 3. (See Table 3.2-6 on p. 3.2-14.)

Another big question is, how accurate can the capacity predictions be? It's important to bear in mind that the predictions apply not to the capacity available within the next 20 years, but to "full-buildout conditions," and this long-range projection involves a lot of hypothesizing.

9
Housing
Capacity

I am not as concerned about discrepancies between the target numbers and the capacity numbers as I am about identifying specifically where the opportunities are for building what we need most urgently, and how the City can develop a pragmatic agenda for developing a more diverse housing stock, avoiding unwarranted assumptions and adverse consequences.

I suppose it goes without saying that comprehensive planning for Winslow and the Island as a whole will involve a lot more than wringing our hands over the requirements of HB 1220.

10
Affordable
Housing

- **Proposed broad direction to Planning Commission re Comprehensive Plan Update**
- **Initial comments on DEIS**
- **Follow up questions for staff regarding DEIS and Alternatives 2 and 3**

RECOMMENDED BROAD DIRECTION FOR PLANNING COMMISSION/ HIGHEST LEVEL GOAL FOR PLAN:

The council’s goal is to integrate new housing legislation (including HB 1220) into the city’s comprehensive plan in a manner that will (1) maximize the production of affordable housing with (2) minimal increase in market rate housing, while (3) having the least impact possible on the Island’s finite resources, and (4) only in conjunction with a plan for timely and feasible (financially and otherwise) infrastructure improvements to meet the needs of new and existing development.

1
Affordable
Housing

2
Environment

3
Capital
Facilities

INITIAL COMMENTS ON DEIS

1. The DEIS appears to have focused almost exclusively on increasing density (upzoning) to comply with HB 1220 and meet our affordable housing goals. The only result that that guarantees is significantly more market rate housing. The proposal to increase new units beyond the number allocated to the city (a projected 44% increase in population) will only magnify that impact and is contrary to the overarching goals of the comprehensive plan.

Volume alone does not create affordability in highly desirable, high priced markets like Bainbridge. Without additional tools there’s no reason to believe that any of the newly zoned units will be affordable. And, even with incentives, revised development standards, etc. – which have rarely been successful in the past – for-profit developers will not be building units for below 80-100% AMI and are very unlikely to ever build fully affordable projects even at 80-100%.

The city and non-profits will build some units for 30-60%, but neither is likely to build for 0-30%. Yet, 867 of the 1417 affordable units we are talking about upzoning for in Winslow are designated for 0-30% AMI, while nothing can or will stop those from being developed instead for a higher level of affordability – most likely, market rate. The broader community has no desire to foster more than a minimal amount of

4
Affordable
Housing

market rate growth, which unlike affordable housing is all impact, and no community benefit. While we must and should create additional capacity in Winslow (and update development regulations and incentives to increase the likelihood affordable units will be built) it is not reasonable or desirable to zone for more units than we were allocated under HB 1220.

4
Affordable
Housing
cot'd

2. The capacity analysis (for accommodating target income levels) appears to be inconsistent and/or incomplete, with the result being a potentially inflated projected deficit of units needed in Winslow.

For example, it appears that there may be inaccurate assumptions regarding whether some number of units between 80-120% of AMI could be accommodated in existing capacity in the conservation area through ADUs. It is not clear how existing capacity in Winslow was calculated – what assumptions were made about unit sizes and types, projected number of ADUs, what pipeline projects are included, etc.

5
Affordable
Housing

3. It appears that no consideration is being given to developing a viable TDR (Transfer of Development Rights) program to move some of our existing capacity in the conservation area into Winslow where it would better meet our overall housing and climate goals, while also as addressing our HB 1220 deficit.

TDRs have been in the city code for over a decade, and a plan to revise and improve them has been officially and unofficially on the council's workplan for probably almost as long. They are consistent with the community's goal of directing new growth into Winslow. Given the Island's finite resources and limited infrastructure, TDRs are a rational part of the solution now more than ever as location of our existing capacity has become critical to our ability to comply with state growth mandates.

6
Transfer of
Development
Rights

4. The alternatives appear to have been influenced by a desire to qualify as a Countywide Growth Center, possibly at the expense of thoughtful planning and without clear council direction.

The term "Countywide Growth Center" appears 63 times in the DEIS, and the reference is repeatedly made that we "are considering" designating an area in Winslow as a Countywide Center during the update. As we must qualify under PSRC (Puget Sound Regional Council) standards for such a designation, and qualification is based on having a sufficient amount of "activity units" per acre, the question needs to be asked to what extent Alternative 2 and 3 were designed to achieve center status, whether that focus resulted in intensifying activity in areas there

7
Countywide
Growth
Center

would not otherwise be designated, and what the implications are for our other community goals and needs.

With regard to council direction, the question of whether to seek a formal PSRC growth center designation has been discussed on multiple occasions since 2020 and questions regarding the option of not making that designation was the subject of a council directed letter from the city manager to KRCC (Kitsap Regional Coordinating Council) in 2022. To date the council has not given direction to move forward with seeking that designation.

7
Countywide
Growth
Center
cot'd

5. There are areas in Winslow proposed be upzoned under Alternatives 2 and 3 that don't make sense (at least aren't intuitive), including some that appear to create a risk of displacement, and others that seem to invite premature redevelopment of relatively new and vibrant existing residential uses. Similarly, there are areas where height or density increases appear contrary to the community's stated preferences and the uses associated with those areas.

Examples include: 2.5 to 4 times increase (depending on scenario) over current maximum density of the properties containing Virginia Villa Apartments, Rhododendron Apartments and Island Terrace Apartments (a total of 138 existing units affordable to low to extremely low income levels), more than doubling the base density of Northtown Woods (a 24 year old, popular family neighborhood already built to a similar density), and increasing building heights to 55 feet in the heart of Winslow (in and around the Waterfront Park, Parfitt Way,). Council and the community need to understand the why behind such specific, target proposal and to what extent community preferences and best practices in planning and urban design were considered.

8
Winslow
Alternatives

6. It does not appear that complete information is being used to estimate the capacity of the Winslow sewer plant for all current and projected needs. There is also no evidence that the city has studied the feasibility of siting, designing, permitting, funding and building an additional plant within the time frame needed to accommodate the number of units being proposed (at the same time that it is acknowledged that there will not be capacity for those units at full build out of the existing plant).

The council has an obligation to ensure that the needs of existing and zoned for but not yet developed (or redeveloped) properties in the Winslow sewer service area be met. It would be irresponsible to add additional housing (or commercial) capacity to Winslow without simultaneously planning for adequate sewer facilities.

9
Sewer
System
Planning/
Infrastructure

7. There has been no reference in the planning process to the fact that the state legislature excused Bainbridge, as a sole-source island city, from compliance with the HB 1110 housing bill, which was passed after HB 1220, and whether that fact should impact our application of 1220.

10
Affordable
Housing

HB 1110 does not apply to “*areas designated as sole-source aquifers by the United States environmental protection agency on islands in the Puget Sound*” (e.g. Bainbridge Island). Minimally, it should be acknowledged that that fact validates the long-held belief of many, if not most, in the community (and clearly stated in the comprehensive plan) that the Island has a limited carrying capacity which should be considered in all decisions regarding growth and development.

8. Alternatives 2 and 3 appear to be premature for the neighborhood centers, due to both lack of adequate transit and multi-modal connections (all centers) and lack of sewer service (Rolling Bay and Island Center). There are also questions surrounding the proposed boundary and density changes for the centers including how much influence benefitting property owners may have had in their development, the fact that subarea processes have either not occurred (Rolling Bay), not completed (Island Center), or are clearly outdated (Lynwood Center) and the fact that where direct community guidance was available, it appears to have been ignored (Island Center).

11
Neighborhood
Centers &
Infrastructure

It is contrary to the goals of our climate action plan to direct further growth to the centers without adequate (non-single use vehicle) transportation infrastructure – a goal recognized the last comprehensive plan update, and not yet realized. Upzoning and changing the boundaries of the centers without a subarea planning process ignores the direction of the existing comprehensive plan and our municipal code. The pending Island Center subarea process should be completed, and in the case of Lynwood Center, there should be a process to update the 27-year-old subarea plan, which seems to have been largely ignored in recent years.

9. The DEIS states that “Island aquifers are expected to be sufficient to supply water” for all three alternatives. But the Groundwater Management Plan is not completed and there are policy questions the council must answer before making such a determination. In particular, the question must be asked whether the projected drawdown of the Fletcher Bay Aquifer is a responsible and sustainable policy.

12
Groundwater
Management
Plan/ Natural
Resources

The Fletcher Bay Aquifer, from which the city’s water utility draws most of its water, is our deepest aquifer which contains ancient water (over 1000 years old) that is not recharged by annual rainfall. While that means that the effects of climate change are not an immediate threat to water levels in the aquifer, it also means that we are at risk of withdrawing water

from that aquifer at a much higher rate than it can be replenished. Models have always shown a drawdown of the Fletcher Bay Aquifer, which isn't surprising as it has been described as being "imperceptibly recharged". The question needs to be asked whether the rate at which we are projected to draw down this finite resource under various growth scenarios is sustainable and responsible – not just for us, but for future generations.

12
Groundwater
Management
Plan/ Natural
Resources
cot'd

10. At the same time that the community and council members have expressed distress over the lack of clarity in the DEIS and it's significant disconnect from the community's vision for the Island, it has been observed on council and in the community that the 2016 comprehensive plan is a high-quality document that articulates virtually the same goals and policies we are pursuing in 2024 (specifically in land use and housing). It may be appropriate at this time to shift the structure of the process toward reaffirming, updating, and fine tuning our existing goals and policies rather than struggling to understand and evaluate (and ultimately work backward from) the alternatives illustrated in the 615-page DEIS document

13
Comprehensive
Plan Update
Process

SPECIFIC QUESTIONS REGARDING DEIS:

1. WHAT WERE THE ASSUMPTIONS/ POLICY DECISIONS BEHIND EXISTING CAPACITY NUMBERS?

a. How were future ADUs estimated for inclusion in capacity of the Winslow subarea and for the conservation area?

(What is the source of that approach and are there other approaches/ formulas that could have been used?)

b. Why was it assumed that no future ADUs in the conservation zone would serve 80-120% AMI* when most ADUs are renting for ~\$1500 - \$2000?

(If 100% AMI 2-person household income is \$95,760, and 80% AMI (same household) is \$76,600, housing budgets (30%) should be ~ \$2400/mo. and \$1900/mo. respectively. Note that AMI chart in the DEIS is two years outdated)*

c. What portion of the existing capacity in Winslow (592 units?) is zoned multifamily or otherwise meets some of our need under 1220?

i. Does the 592-unit capacity include pipeline projects? What pipeline projects were identified in Winslow?

(Wintergreen? The Oliver? Ericksen Community? Finch Green? The city's affordable housing project at WW and 305?...)

14
Affordable
Housing

d. Was the potential for subdivision (into duplexes etc.) of existing structures (residential and commercial) considered?	15 Housing Capacity
e. Was the development of a viable TDR program considered as a tool to move existing conservation area capacity into Winslow to lessen the amount of new capacity needed? <i>(Note that TDRs were on the City Council's work plan as recently as last year)</i>	16 Transfer of Development Rights
2. <u>WHAT WERE THE ASSUMPTIONS/POLICY DECISIONS BEHIND THE SPECIFIC INCREASES TO HEIGHT, DENSITY, AND LOCATION OF NEW DEVELOPMENT/ REDEVELOPMENT ILLUSTRATED IN ALTERNATIVES 2 AND 3?</u>	
a. What assumptions were made to translate FAR into number of residential units? (e.g. with regard to square footage, number of bedrooms, etc.) <i>(What is the source of that approach and are there other approaches/ formulas/ best practices that could have been used?)</i>	17 Housing Capacity
b. What assumptions were made to substantiate a recommendation of heights up to 55 feet? <i>(Specifically, what factors (other than penciling out for developers) were considered? Were any design principles/ best practices for urban planning – e.g. preference for “human scale” buildings – considered when developing height and mass recommendations.)</i>	18 Winslow Alternatives
c. To what extent were proposed upzones, and the location of those upzones, as shown in the alternatives, intended to increase activity within a specific area to qualify as a Countywide Growth Center?	19 Countywide Growth Center
d. To what extent were requests of proposals from specific landowners considered in the development of the alternatives? <i>(For example, the boundary changes and upzones proposed for the neighborhood centers)</i>	20 Alternatives
e. How was the risk of displacement specifically analyzed in developing recommendations for rezoning existing affordable housing in Winslow?	21 Winslow Alternatives
f. How will rezoning existing viable residential properties (e.g. Northtown Woods) increase the number of affordable units within this comprehensive plan cycle?	22 Housing Capacity

3. WHAT WERE THE ASSUMPTIONS /POLICY DECISIONS BEHIND THE ESTIMATED CAPACITY OF THE EXISTING WINSLOW SEWER PLANT AND THE FEASIBILITY OF A PROPOSED NEW FACILITY?

- a. Has a feasibility study been done for a new sewer plant (of any size) in or near Winslow subarea?**

(If so, where would this plant and outfall be located, what would be the estimated cost, how would it be funded, and by when could it feasibly be designed, permitted and built?)

23
Sewer
System
Planning/
Infrastructure

- b. What is the true maximum capacity of the current plant at full build out, and what is its projected excess capacity after taking into consideration current users, existing commercial and residential capacity not yet developed, and residents on septic inside the Winslow sewer service area?**

24
Sewer
System
Planning/
Infrastructure

4. WHAT OTHER ASSUMPTIONS /POLICY DECISIONS HAVE BEEN MADE IN THE OVERALL APPROACH TO THE DEIS

- a. Was the fact that the legislature has recognized (subsequent to the passage of HB 1220) that Bainbridge Island has unique limitations due to our status as a sole-source aquifer island-city taken into consideration in any of the planning around the DEIS alternatives?**

RCW 36.70A.635 (implementing HB 1110):

...

(8) The provisions of this section do not apply to:

...

(b) Areas designated as sole-source aquifers by the United States environmental protection agency on islands in Puget Sound;

...

25
Alternatives

- b. Has the question been asked not just whether there will be sufficient groundwater (for human and environmental needs) over the next 100 years, but whether the drawdown is sustainable for future generations?**

(On September 24th of this year, the council was presented with data showing a drawdown of the Fletcher Bay Aquifer of “over 100 feet” in the areas around the largest wells pulling from that aquifer. The aquifer has been described as varying being 50-300 feet thick. This would seem to suggest a significant impact on capacity available for the subsequent 100 years.)

26
Groundwater
Management
Plan/ Natural
Resources

Councilmember	Comment #	Comment	Staff Response/Analysis/Notes
AFFORDABLE HOUSING			
Schneider	2	Offer a variety of incentives or subsidies for projects that are 100% affordable to households below low-income (80% AMI and below)	Noted
Schneider	5	Increase base FAR in Winslow to enable a mandatory inclusionary zoning program and other incentives to achieve moderate income units and to promote deeper affordability.	The housing section of the DEIS (Section 3.2) acknowledges that improvements to the City's inclusionary zoning program and other Housing Action Plan (HAP) actions must be implemented even to achieve affordability with Alternatives 2 and 3.
Deets	1	The City has a responsibility to increase affordable housing on Bainbridge Island.	Affordable housing was a major driver for land use changes proposed in DEIS Alternatives 2 and 3.
Mathews	1	Achieve affordable housing in Winslow through a combination of Alternatives 2 and 3.	Noted.
Quitslund	8	Does the difference between proposed capacities and mandated targets indicate that the proposed alternatives involve higher density development than is needed?	Through the Affordable Housing Task Force, a 2019 report by ECONorthwest, and the Housing Action Plan (HAP), the City has been examining how its inclusionary zoning could be updated to ensure that it produces affordable housing units in a mixed-income development. The densities studied and proposed by Alternatives 2 and 3 in the designated centers were selected to meet State mandates as well as implement the Housing Action Plan, including mandatory inclusionary zoning and increasing middle housing opportunities. Existing density or significantly lower density development than studied may make a mandatory inclusionary zoning program infeasible. It should be noted that there is not any "downzoning" proposed in Alternatives 2 and 3, therefore population capacity in the Conservation Area is more than 4,000 people in all 3 Alternatives (DEIS Table 3.1-2).
Quitslund	10	Comprehensive planning inside and outside of Winslow involves more than meeting the requirement of HB 1220.	Noted. Transportation, Public services, and Utilities are a few of the other topics to address through comprehensive planning.

Councilmember	Comment #	Comment	Staff Response/Analysis/Notes
Hytopoulos	1	Maximize affordable housing with minimal increase in market rate housing.	Noted. Through the Affordable Housing Task Force, a 2019 report by ECONorthwest, and the Housing Action Plan (HAP), the City has been examining how its inclusionary zoning could be updated to ensure that it produces affordable housing units in a mixed-income development. Higher FARs in some Winslow zones proposed by Alternatives 2 and 3 in Winslow are proposed to enable a mandatory inclusionary zoning program.
Hytopoulos	4	The focus on meeting HB 1220 affordable housing requirements increases market rate units, which are not desired. Other housing tools, besides density, are needed to ensure affordable housing is built. Limit extra market rate units.	See response to Comment #1 above. Other housing tools identified by the HAP can continue to be considered.
Hytopoulos	5	What types of units were assumed to serve 80-120%AMI in capacity analysis? Were ADUs counted toward meeting target in that income range? What assumptions were made about unit sizes?	The City utilized Department of Commerce guidance to estimate what type of units could be serve different income ranges. ADUs are assumed to serve 80%-120% AMI per this guidance. This is discussed in Table 2-3 of the DEIS—ADUs comprise the full extent of 188 units in the Conservation Area under “Multi-Family (Mod. Density) >80%-120% AMI.” (See also Step 8.4 of Land Capacity Analysis report for information about how ADUs were included in residential capacity.) An average unit size of 850 ft ² was used to calculate multifamily units in FAR zones in all alternatives (see Step 8.1 of Land Capacity Analysis report).
Hytopoulos	10	No reference in DEIS that City is exempted from middle housing bills because the City is a sole-source island City, and whether that should impact the City's requirements of HB 1220.	The City of Bainbridge Island was exempted by HB-2321 from HB-1110 (now codified in RCW 36.70A.635). The City of Bainbridge Island is also exempt from HB-1337 (related to ADUs) because of the Island-wide aquifer recharge area designation. HB-1220 (now codified in RCW 36.70A.070 – Mandatory Elements) does not provide an exception applicable to the City of Bainbridge Island. Therefore, the housing allocations adopted in the Kitsap Countywide Planning Policies are the housing growth targets for the City of Bainbridge Island Comprehensive Plan Periodic Update.

Councilmember	Comment #	Comment	Staff Response/Analysis/Notes
Hytopoulos	14	How were future ADUs estimated for inclusion in capacity? Why was it assumed that future ADUs would not serve 80-120% AMI? Does any of the Winslow Alt. 1 capacity zoned multifamily or otherwise meet HB 1220 requirements? Were pipeline projects included in housing capacity?	See response to comment #5 above related to ADU capacity and assumed income levels. See DEIS Table 2-3 for information about units and assumed income levels. For the 3 alternatives in Winslow, housing units in the R-14, R-8, and all mixed-use zones were assumed to produce multifamily units. See DEIS Table 3.2-10 in Section 3.2 Housing for information about housing units per zone for each Alternative. See Step 1.1 of Land Capacity Analysis report for information about how pipeline projects were included in capacity.
HOUSING DIVERSITY			
Schneider	1	Promote smaller units by 1) allowing 2 ADUs per property and reduce regulatory barriers to constructing ADUs; 2) allow existing buildings to be divided into multiple units; 3) switch from units/acre zoning to FAR or Form-based Code.	1) DEIS Alternatives 2 and 3 propose allowing 2 ADUs in R-5 zone. 2) The City must comply with House Bill-1042 by 6/30/2025. This requires the City to allow a one-time 50% residential density bonus during the internal renovation/alteration of any existing residential or commercial building. Switching density standard away from units/acre was not studied in the DEIS outside of Winslow and the Neighborhood Centers.
Schneider	6	Incentivize other community housing needs e.g. rentals and/or smaller units. See diagram included with comment	Floor Area Ratio as a tool already incentivizes smaller units, so further incentivizing is unlikely to be as effective. Implementing regulations could include a required minimum mix of dwelling unit sizes, though this may be difficult to be effective across an array of project types. Rentals may be incentivized via the Multifamily Tax Exemption program, particularly if that program were expanded as described in HAP. There are other tools to promote smaller units (e.g. microunits) that could be considered as part of development regulations.
Mathews	4	Remove regulatory barriers to promote ADU construction to work towards housing targets.	DEIS Alternatives 2 and 3 proposed allowing 2 ADUs in the R-5 zone. Allowing more than 1 ADU in other residential zones, including Winslow, and/or removing barriers to ADU construction were identified in the Housing Action Plan, and could be considered as part a Preferred Alternative and implementing development regulations.

Councilmember	Comment #	Comment	Staff Response/Analysis/Notes
Quitslund	2	Zoning should be revised to enable higher density and multifamily housing. What areas are NOT expected to change through any of the alternatives?	Noted. There are several areas not proposed for any zoning changes in Winslow Alternative 2 or 3, particularly in the eastern and western portions of greater Winslow. DEIS Figure 3.1-13 is a side-by-side map of all 3 Winslow Alternatives.
Quitslund	6	Interest in allowing duplexes and housing co-operatives in the Conservation Area	Noted. Multifamily is allowed as a conditional use in the Conservation area today, albeit with density standards applied. House Bill-1042 would enable the conversion of existing single-family residences into duplexes, but additional changes would be required to enable new duplex buildings.
WINSLOW			
Schneider	3	Modify Winslow Subarea boundary as in Alternative 3 to expand to north and west and exclude area in eastern Winslow.	Noted
Schneider	7 & 8	Incentivize redevelopment in Ferry and High School Road Districts to achieve a walkable neighborhood with mandatory and incentivized affordable housing.	Alternatives 2 and 3 propose the largest increases of FAR in the Ferry and High School zones to spur redevelopment.
Quitslund	3	What are examples of housing types that are generated by each Alternative?	Within the DEIS Housing section (3.2) there is a graphic to show generally the types of housing that would be generated by Alternative 1 (Table 3.2-8) and Alternatives 2 and 3 (Table 3.2-11).
Hytopoulos	8	Why were some areas upzoned in Alts. 2 and 3 Winslow? Do we expect redevelop everywhere? Displacement risk for existing affordable housing?	Although every property has a “zone”, the City did not assume that every property would redevelop under any of the alternatives. The City can’t propose “spot zoning” to rezone only vacant properties. The City is required to adopt anti-displacement measures as part of new Housing Element requirements, and to implement the Housing Action Plan. Displacement is addressed in DEIS Section 3.1 Land Use and Section 3.2 Housing.
Hytopoulos	18	What assumptions were made to substantiate a recommendation of heights up to 55 feet?	Increasing the building height by approximately 1 or 2 stories in some zones in the Winslow alternatives allows the City to consider increasing density without increasing building footprints, because the buildings can “Go Up”, as Alternative 2 has been labeled. See a detailed description of the Winslow Subarea Plan Alternatives in DEIS Chapter 2 EIS Overview & Alternatives and in the Draft Summary of Alternatives document on the WSP project website .

Councilmember	Comment #	Comment	Staff Response/Analysis/Notes
Hytopoulos	21	How was the risk of displacement specifically analyzed in developing recommendations for rezoning existing affordable housing in Winslow?	See response to comment #8 above.
NEIGHBORHOOD CENTERS			
Mathews	2	Leave all three NC areas unchanged at this time, except to increase FAR on one undeveloped NC property in Lynwood. The City should reconvene previous Island Center Subarea Planning committee.	Noted.
Quitslund	4	No action in the 3 NCs at this time. Future changes should be considered through subarea planning, except for Island Center Subarea Planning, where some previous recommendations should be considered.	Noted.
Quitslund	5	No action in the 3 NCs or Day Road at this time. Comprehensive Plan should establish goals for achieving affordable housing and jobs in these areas.	Noted.

Councilmember	Comment #	Comment	Staff Response/Analysis/Notes
Hytopoulos	11	Alternatives 2 and 3 for the NC areas seem premature without adequate transportation and utility infrastructure. Unclear if benefiting property owners influenced had in developing alternatives. Why wasn't subarea planning begun or included (regarding Island Center).	Utility and transportation capacity were analyzed in DEIS Sections 3.7 and 3.9. Planned improvements were found to provide adequate capacity for Alternatives 2 and 3. GMA requires [WAC 365-196-010(1)(f), .210(7), and .840], infrastructure improvements to happen concurrently with development. Staff consulted with the Kitsap Public Health District regarding reasonable assumptions for urban development in Neighborhood Centers on septic systems. These assumptions are documented in the Land Capacity Analysis for the DEIS alternatives. On 8/10/2021, the City Council indefinitely suspended the Island Center subarea planning process and requested a recommendation related to rezoning the Bainbridge Garden properties and dimensional standards for existing NC properties in Island Center. The requested review has been wrapped into the Comprehensive Plan Periodic Update. On 6/27/2023, the City Council adopted a Work Plan for the Comprehensive Plan Periodic Update, which included integrating only the Winslow Subarea planning process and no other subarea planning process.
ALTERNATIVES			
Hytopoulos	20	To what extent were requests/proposals from specific landowners considered in the development of the alternatives?	The Alternatives were developed to meet housing, sustainable transportation, and climate goals. During the scoping and DEIS comment periods, the City received comments and inquiries regarding the rezoning of specific parcels in or near Winslow and Island Center. Staff did not consider these parcels individually, but rather assessed areas on a district basis. Some of the parcels ended up being included in the alternatives and some did not.
Hytopoulos	25	Was the fact that the legislature has recognized (subsequent to the passage of HB 1220) that Bainbridge Island has unique limitations due to our status as a sole-source aquifer island-city taken into consideration in an of the planning around the DEIS alternatives?	The alternatives were drafted to respond to the City's housing, climate and transportation goals. The DEIS analyzes or discusses the City's aquifers and the Groundwater Management Plan in Sections 3.7 Utilities and 3.8 Natural Environment.

Councilmember	Comment #	Comment	Staff Response/Analysis/Notes
CAPITAL FACILITIES/INFRASTRUCTURE			
Deets	3	The City must manage development with respect to economic sustainability.	After a preferred alternative is identified, the City will draft updates to its Capital Facilities Plan for City Council review.
Hytopoulos	3	The City must manage development with a plan for providing timely and feasible infrastructure	Noted The Growth Management Act does require concurrency between land use and capital facilities (infrastructure) planning. The City's Capital Facilities Plan will be updated to support a preferred alternative. The impact of the 3 alternatives on infrastructure is described in DEIS Sections 3.7 Utilities and 3.10 Transportation.
Hytopoulos	9	What is the estimated capacity of the Winslow sewer plan for all current and projected needs? What has the City studied in relation to building a new sewer plant?	The DEIS addresses the impact of the three alternatives on the City's sewer utility in Section 3.7. The Winslow Wastewater Treatment Plant (WWTP) is currently undergoing capacity upgrades as required by the City's Discharge Permit through the Department of Ecology as a result of existing flows exceeding 85% of the plant's capacity. The upgrades provide capacity to serve an additional 1,102 ERUs (2,733 people) and will require additional upgrades beyond 2038 that can reasonably provide an additional 1,008 ERUs (2,500 people) capacity. The City has performed a wastewater beneficial re-use study that sites an upstream secondary plant where groundwater recharge is favorable and commercial re-use customers might exist (irrigation sites) near or around Sakai Park. Footprint expansion of the existing Winslow WWTP could also be considered, as it will not likely be necessary until post 2045.
Hytopoulos	23	Has a feasibility study been done for a new sewer plan (or any size) in or near the Winslow subarea?	As mentioned in the previous response, the only feasibility work performed for a new sewer plant in the Winslow area is the draft, conceptual level analysis included as part of the Wastewater Beneficial Re-use project. No further analysis work is currently planned.
Hytopoulos	24	What is the true maximum capacity of the current sewer plant at full build out, and what is its projected excess capacity after taking into consideration of current users, existing commercial, and residential capacity not yet developed, and residents on septic inside the Winslow sewer service area?	The estimated maximum capacity of the Winslow Wastewater Treatment Plant is identified in the previous response (#9). The capacity is based primarily on residential development, as there are many variables affecting commercial capacity, including types of uses, sizes of those uses, and potential pre-treatment mitigation options. The staff have not performed an analysis of how many existing homes in the Winslow sewer service area are currently served by septic systems. However, the service area boundary is closely mimicked by existing infrastructure, indicating that there are a limited number of single-family homes that are served by septic.

Councilmember	Comment #	Comment	Staff Response/Analysis/Notes
ENVIRONMENT/NATURAL RESOURCES			
Deets	2	The City must manage development with respect to environmental sustainability.	Chapter 3 of the DEIS analyzes how a wide variety of aspects of the environment are affected by the proposed alternatives.
Mathews	3	Adopt additional agriculture protection/conservation tools.	The Land Use, Environmental, and Economic Elements of the existing Comprehensive Plan have goals and policies that advocate for protection of agriculture on Banbridge Island. See also BIMC 16.24 (Protection & Preservation of Farmlands and Open Space), BIMC 16.26 (Right to Farm), BIMC 18.27 (Transfer of Development Rights).The City collaborates with the County to review applications for the Current Use Tax Assessment program , reducing property taxes for qualifying properties.
Hytopoulos	2	The City must manage development to have the least impact with respect to environmental finite resources.	Chapter 3 of the DEIS analyzes how a wide variety of aspects of the environment are affected by the proposed alternatives.
Hytopoulos	12	DEIS states that aquifers are expected to supply water for all three alternatives. The GWMP isn't completed, and the City Council should answer policy questions first, particularly about the Fletcher Bay Aquifer.	The next groundwater management plan discussion is scheduled for the November 19 CC study session - update and support provided by City's consultant EA engineering. Initial groundwater modeling presented to the City Council in September indicates that resources are sufficient to meet the demands of the proposed increases in population – including stresses associated with climate change - with associated infrastructure planning and environmental mitigation.
Hytopoulos	26	Has the question been asked not just whether there will be sufficient groundwater (for human and environmental needs) over the next 100 years, but whether the drawdown is sustainable for future generations?	The groundwater management plan makes projections about the 100-year drawdown, but bases that projection on several compounding hypothetical variables, including well locations. Well locations, particularly major production well locations, are critical for understanding drawdown since the more production wells there are, and the more spread out they are, the more they will shape drawdown patterns. The initial groundwater modeling results indicate that the City's aquifers are resilient and able to provide supply at the 100-year timeframe. However, as the final GWMP is developed, the City's consultant team will be making a recommendation about the level of drawdown that can be considered reasonable over certain time periods.
TRANSFER OF DEVELOPMENT RIGHTS (TDR)			

Councilmember	Comment #	Comment	Staff Response/Analysis/Notes
Hytopoulos	6	It looks like a TDR program was not considered in the DEIS, as part of conservation or promoting bonus multifamily units in centers.	The City's TDR program was not in the DEIS analysis. Improvements to the program could be part of implementing regulations for a preferred alternative.
Hytopoulos	16	Was the development of a viable TDR program considered as a tool to move Conservation Area capacity into Winslow?	See response to comment #6 above.
COUNTYWIDE GROWTH CENTER DESIGNATION			
Quitslund	7	Interest in discussing candidate countywide growth center designation	Noted. Information regarding this designation can be found in the Countywide Planning Policies and in DEIS Population and Employment section, pages 3.3-20 and 3.3-24.
Hytopoulos	7	The alternatives appear to have been influenced by a desire to qualify as Countywide Growth Center.	The City did not analyze the Winslow Alternatives for qualifying as a Countywide Growth Center until Alternatives were undergoing environmental review through the DEIS; the alternatives were developed to achieve housing, sustainable transportation, and climate action goals. Winslow is identified as a Candidate Countywide Growth Center in the Countywide Planning Policies. See DEIS Population and Employment section, pages 3.3-20 and 3.3-24.
Hytopoulos	19	To what extent were proposed upzones and the location of those upzones [in Winslow] intended to increase activity within a specific area to qualify as a Countywide Growth Center?	See response to comment #7 above.
HOUSING CAPACITY			
Quitslund	9	How accurate are the capacity predictions?	Capacity predictions take into account the best available information; however, the exercise is inherently theoretical and cannot be relied upon to predict with absolute precision how development will occur over the course of the planning period.

Councilmember	Comment #	Comment	Staff Response/Analysis/Notes
Hytopoulos	15	Was the potential for subdivision (into duplexes etc.) of existing structures (residential and commercial) considered.	Future subdivision in residential zones was included in the Alternatives capacity analysis. See DEIS Table 3.2-10 in Section 3.2 and Step 1.4 in the Land Capacity Analysis report. Dividing up the interior of existing buildings to create new residences was not considered in the City's capacity analysis. Under HB-1042, existing structures can be remodeled to residential use with a 50% bonus density. Without a history of this type of development in the Conservation Area, staff conservatively assumed there would be no significant amount of units created under this new provision. The City will monitor this type of development to inform future capacity assumptions.
Hytopoulos	17	What assumptions were made to translate floor area ratio (FAR) into number of units?	In the Winslow zones that utilize FAR, and for Neighborhood Center properties in Alternatives 2 and 3 where FAR is proposed, an average unit size of 850 square feet was utilized to translate building size into dwelling units. See Step 8.1 below from the Land Capacity Analysis report (page 15-16).
Hytopoulos	22	How will rezoning existing viable residential properties (e.g. North Town Woods) increase the number of affordable units within this comprehensive plan cycle.	In Winslow Alternative 3, the subarea boundary is proposed to move to the north and west to align with the City's sewer boundary, and properties within this expanded boundary are rezoned in this alternative. As with existing zoning (Alt. 1), the City's capacity methodology assumes that redevelopment is more likely with vacant or underdeveloped properties, and fully developed or recently developed properties are not assumed to be redeveloped. There are some existing ADUs within the North Town Woods development, and it is reasonable to expect additional ADUs to be constructed in the future.
IMPLEMENTATION			
Schneider	4	Remove the minimum parking requirements.	Modifications to parking requirements will be reviewed with development regulations for the preferred alternative. Recent state legislation (SB 6015 and HB-1042) will already require some changes to City parking standards as part of this update.
Quitslund	1	Define "context-sensitive" and "low impact development" to reconcile development and conservation per adopted Goal LU-14.	Note that Goal LU-14 was partially implemented through adoption of the City's Aquifer Recharge Protection Area (ARPA) regulations (BIMC 16.20.100) in 2018. City subdivision (BIMC Title 17) and stormwater (BIMC Chapter 15.19 and 15.20) regulations also implement this goal.
COMPREHENSIVE PLAN UPDATE PROCESS			

Councilmember	Comment #	Comment	Staff Response/Analysis/Notes
Hytopoulos	13	Community members have expressed distress about the DEIS and a disconnect from the existing Comprehensive Plan vision. It seems like goals of this 2024 effort are the same as already exist in 2016 Comprehensive Plan, and it's time to review the existing goals and policies.	During the 2023 scoping period, the City heard strong support for the existing vision for outside Winslow and the updated the Winslow vision. Once the City finalizes a Preferred Alternative of the Winslow Subarea and Comprehensive Plans, then the existing Plan goals and policies will be reviewed, and any necessary updates identified.

**Questions for City Council Response on Comprehensive Plan and
Policy Direction on Preferred Alternative.**

1. Should residential growth only be allocated to the Winslow Town Center (with no growth allocated to the designated Neighborhood Centers)?
2. Should the city encourage the private developers to build some of the affordable (0-100% Area Median Income households) housing required by HB 1220 using mixed income development?
3. If yes, should the city develop and implement a mandatory inclusionary housing zoning program in all of Winslow or only in limited areas of Winslow (e.g., High School Road, Ferry, Core Districts)?
4. Should maximum building heights in Winslow be increased to 45 feet in the less intense zones and 65 feet in the more intense zones or should only the most intense zones (High School Road, Ferry and Core Districts) have maximum building heights increased?
5. Should the Winslow subarea boundary shift to the north and west to align with the sewer service area boundary?
6. Should the eastern side of the currently designated Winslow Town Center be changed so that Wing Point is no longer in the subarea?
7. Should the capacity of the Day Road Business and Industrial Center be increased to encourage economic development?
8. Should density be increased in the Conservation Area to allow more housing?
9. Should the City allow more than one accessory dwelling unit (ADU) per lot in any of the following areas? Conservation Area, Neighborhood Centers, Winslow
10. Should an area within Winslow be designated a countywide growth center per the Kitsap Countywide Planning Policies?