



August 17, 2021

Job No. 2090-003-021

Mr. John McDonagh
Senior Planner
City of Port Townsend
250 Madison St, Suite 3
Port Townsend, WA 98368

**RE: Planned Unit Development Approval Criteria
Madrona Ridge**

Dear Mr. McDonagh:

Please accept this letter and accompanying information on behalf of Montebanc Management, as our Planned Unit Development (PUD) application approval criteria letter.

In an effort to provide concise and direct responses, we have copied the pertinent PUD approval zoning code sections below in *italics* and included our responses in **bold**.

17.32.100 Preliminary approval criteria

The following criteria are the minimum measures by which each proposed PUD will be considered:

- A. *PUDs shall be given preliminary approval, including preliminary approval subject to conditions, upon finding by the city that all of the following have been satisfied:*
1. *The proposed PUD conforms to:*
 - a. *Port Townsend Comprehensive Plan*

The proposed Planned Unit Development is consistent with the *Port Townsend Comprehensive Plan* (PTCP) designation of R-II (SF) Residential Single Family, Medium Density and R-III. The project is consistent with the following specific goals and policies of the PTCP:

Chapter 4- Land Use Element

***Policy 2.3:** Protect natural resource lands, archaeological properties, and critical areas through public and private initiatives, such as open space tax incentives, cluster development, PUDs, transfer or purchase of development rights, public land acquisition, dedication of City-owned tracts and street rights of way, conservation easements, landowner compacts, soliciting donations of land, downzoning, limiting the amount of lot coverage, and best management practices in development.*

The project proposes to protect, and keep as permanent open space, critical areas, and their associated buffers by placing them in non-buildable tracts. While there will be some reductions to the buffers, they will be mitigated through buffer averaging additions. See *Critical Area Report and Mitigation Plan* by Wetland Resources, dated August 2021 for details.

Policy 3.2: Develop and implement nonregulatory and regulatory means for acquiring and developing the open space and trails network.

3.2.1: During development review, encourage applicants to dedicate land for future open space and trails.

The applicant is providing a 5.84-acre open space tract (Tract I) in the southwestern portion of the project site. Tract I is proposed as a potential dedication and addition to the City for the future Janke property Park.

4.3.1: During development review, encourage developers to dedicate land for future park and recreation facilities.

The applicant is providing an open space tract (Tract I) in the southwestern portion of the project site. Tract I is proposed as a potential dedication and addition to the City for the future Janke property Park.

Policy 7.3: Pursue strategies intended to reduce stormwater runoff to levels not likely to cause flooding, significant erosion to natural drainage ways, or significant degradation of water quality.

The applicant is providing stormwater detention ponds that will provide water quality treatment of stormwater. The ponds were designed to accommodate the stormwater runoff from the Madrona Ridge project and will discharge into the piped public stormwater system. The stormwater discharge from all ponds in the vicinity of the parcels #973800201 and 973800301 discharge at rates and durations that are less than the pre-developed forested conditions for all flows up to the 100-year storm event. Since the areas of the project site that drain to those wetlands will remain approximately equal from pre- to post-development, the total runoff volume (and the net hydrologic response) that the wetlands receive will be maintained in the post-development conditions. Additionally, all stormwater runoff is treated in for Basic Water Quality Treatment (80% TSS removal, as determined in WWHM2012) in the dead-storage of each proposed detention pond to ensure that the wetlands are not affected by the proposed development.

7.3.3: Develop standards for narrower residential streets, with reduced, but adequate, parking opportunities.

The applicant is proposing an internal road network consisting of 40' wide residential roads. Each residential lot will accommodate 4 onsite parking spaces.

7.3.8: Encourage cluster development that minimizes impervious surfaces.

The project made use of cluster development techniques to minimize impervious surfaces and provide open space for public use.

Policy 9.2: Locate medium and high-density housing in areas of the community most suitable for such uses, based on consideration of environmentally sensitive areas, the availability of existing services, public utilities and facilities, and transportation facilities.

The applicant is proposing a medium density housing development in an overwhelmingly residential area of Port Townsend. The project design considers environmentally sensitive areas, provides adequate public utilities, and will develop transportation facilities.

Chapter 5 - Housing Element

Policy 4.1: Encourage the integration of a mix of housing types, densities, and costs suitable for a population diverse in age, income, household composition, and individual needs.

The applicant is proposing to integrate a mix of densities (R-II and R-III) in order to provide a variety of housing inventory and attract a diverse community to the development.

Policy 4.2: Encourage innovation and variety in housing design and site development and support unique and sustainable community housing projects such as co-housing, planned unit developments (PUDs), "grow" home and cottage home developments, and cluster developments that offer an alternative to the City's prevailing grid pattern.

The applicant is proposing a cluster development, through a PUD application.

4.2.1: Encourage clustering and small lot PUDs in order to retain open space and promote the construction of affordably priced attached single-family houses.

The applicant is proposing a cluster development, with lots ranging from 3600 to 4770 SF through the PUD application process. The area gained through clustering will be used as open space and for the protection of environmentally sensitive areas.

Chapter 6 - Transportation Element

Policy 1.3: Provide a transportation system that enhances neighborhood development and infill.

The proposed dedication for Rainier Street will provide north/south access to future developments and construct a significant portion of a much-needed north/south transportation connection. The internal road network promotes local access use only.

Policy 1.5: Design streets to serve a varied land use pattern, which includes higher standards for commercial areas and mixed-use centers and lower standards for local access streets.

The applicant is providing smaller roads (40' wide) for internal use. The internal road design was selected with the lower standard necessary for local access streets in mind.

Policy 1.7: Promote biking, walking, and transit use in order to reduce growth of automobile traffic.

Through the provision of multi-use pathways, the project is promoting biking and walking as alternatives to automobile traffic.

Policy 1.11: Encourage land use and transportation practices that reduce fossil fuel consumption and greenhouse gas emissions.

The use of clustering to reduce impervious surfaces and sprawl and the provision of multi-use paths to promote active recreation and transportation are design choices meant to reduce fossil fuel consumption and greenhouse gas emissions.

Policy 3.5: Provide adequate setbacks for residential uses along arterials to protect adjoining properties from noise, dust, and traffic safety impacts.

Rainier Street is a minor arterial proposed with the development. The residential uses will have at least 20' of separation between property lines and the future Rainier Street. Most lots closest to Rainier Street will have open space and/or a storm pond between the road and nearest property lines.

Policy 3.7: Manage access onto arterials and minimize driveways and driveway width.

Access onto the future minor arterial will be limited one entrance (Madrona Blvd).

Policy 4.2: Develop and maintain design standards that encourage "narrow streets" to help retain the City's small-town atmosphere, to enhance safety, and to minimize the amount of paved area to reduce construction costs, storm water runoff, and heat buildup. Local street standards should reflect a balance between safety, efficiency, maintenance, and preserving small town character.

The internal road network consists of 40' wide roads. These tree lined streets with sidewalks on both sides will create a pedestrian friendly, small-town atmosphere, while reducing paved areas and vehicular travel speeds.

Policy 4.3: Develop standards and street layout guidance to encourage local access and residential traffic only on local streets to minimize traffic noise, congestion, and hazards to pedestrians. Discourage through access for motorized traffic by traffic calming and/or by not requiring certain sections of streets to be opened to motor vehicles.

The reduced street width (40') and street layout encourage local access and residential traffic only on the internal roads. The minor arterial connecting to the site will only have one access which will discourage through access for motorized traffic.

Policy 4.6: Facilitate active transportation connections by encouraging the street system in new subdivisions and planned unit developments (PUDs) to be designed and built on a rectangular grid or a modified grid pattern. If cul-de-sacs or dead-end streets are used, require multi-use paths to connect the dead ends to on-site and off-site pedestrian and bicycle facilities and provide for a sufficient number of thoroughfares (connections to arterials, collectors, or feeders) for public transit and emergency access.

The proposed PUD will have an efficient rectangular grid pattern with pedestrian facilities throughout. No cul-de-sacs or dead-end streets are proposed.

Policy 5.3: Provide pedestrians and bicyclists with a safe, convenient, and interconnected system of facilities, incentives, and services that fully support trip-making connections between residential areas, employment centers, shopping, recreational facilities, points of interest,

schools, public transit, and other public services within the City. Develop this system using measures that include:

- a. Physically separating pedestrian and vehicle (including bicycles) traffic;
- d. Providing pedestrian facilities that meet ADA requirements;
- f. Expanding and improving the City-wide sidewalk/pathway system including on- and off-road trails to establish safe integration of bicycle and pedestrian circulation.

The project will provide pedestrian and bicycle facilities throughout that meet ADA requirements and that expand and enhance the City-wide sidewalk and pathway system.

Policy 5.5: Require walkways, bikeways, and trails where appropriate in planned unit development (PUD), subdivision, and plat approvals, including safe routes for children who walk to school.

All lots will have walkways that provide a safe route for children who walk to school.

Policy 6.4: New developments should be designed to allow local traffic movement while discouraging nonlocal through traffic.

The rectangular grid pattern and single access to the minor arterial will allow for local traffic movement while discouraging nonlocal through traffic.

Policy 9.9: New and redeveloped residential areas should be planned to accommodate adequate off-street parking. This will encourage narrower streets.

The development will provide at least four (4) off-street parking spaces (including garages) per residential lot and will allow for 40' wide streets.

Chapter 7 - Utilities Element

Policy 2.1: Require all new development to connect to the City's water system as a condition of development.

The applicant is proposing to connect to the City's water system.

Policy 2.2: Require new development to construct water system improvements necessary to serve the development consistent with the City engineering design and construction standards and Washington State Department of Health (DOH) regulations and requirements, and provided that the costs of the extensions are paid for by the developer or new customers, off-site impacts are mitigated, all necessary permits are obtained, and all right-of-way issues are resolved.

The applicant will construct a water system improvement necessary to serve the development.

Policy 10.1: Ensure that all existing and new development within the Port Townsend Urban Growth Area (UGA) has adequate wastewater collection and treatment facilities and that connection to the sanitary sewer system is required wherever practical or environmentally necessary.

The project will connect to the City's sanitary sewer system.

Policy 14.1: Review each public and private development project to ensure conformance with the standards of the City's Stormwater Management Plan, Engineering Design Standards, and the Department of Ecology's Stormwater Management Manual for Western Washington to ensure that discharges of stormwater into ponds, drainage corridors, wetlands, groundwater, salt water, and other water bodies, do not result in a degradation of water quality.

The proposed stormwater ponds will adhere to standards of the City's stormwater management plan, engineering design standards, and the Department of Ecology's Stormwater Management Manual.

Policy 15.2: Pursue strategies intended to reduce stormwater runoff to levels not likely to cause flooding, significant erosion to natural drainage ways, or significant degradation of water quality.

The proposed development's four (4) stormwater detention ponds are intended to control stormwater runoff and protect water quality.

Policy 15.4: Protect wetlands and other environmentally sensitive areas from flooding and increased runoff from new development and land clearing activities.

The onsite wetlands will be placed in non-buildable open space tracts in perpetuity, which will protect them from any future impacts, including land clearing activities.

Chapter 8 - Capital Facilities Element

Policy 4.2: Review and condition each development to ensure that appropriate provisions are made for facilities, services, and utilities not required for concurrency, including but not limited to:

- a. Fire and emergency medical services (EMS);
- b. Parks, open spaces, and trails;
- c. Law enforcement; and
- d. Schools and school facilities.

The proposed development has made provisions for fire and emergency medical services throughout the site, including a 20' wide emergency access road at the NE corner of the project site that provides an additional connection to Rainier Street.

The proposed project provides approximately 13.52 acres of open space and a network of multi-use trails.

Chapter 9 - Economic Development Element

Policy 1.4: Maintain and enhance Port Townsend's natural, historical, and cultural amenities in order to assist in attracting new businesses, retaining existing ones, and promoting economic vitality.

Madrona Ridge is proposing to enhance and embody Port Townsend's historical character by incorporating Victorian design elements in a public courtyard, benches, lighting, and other site features.

b. All provisions of the Port Townsend Zoning Code which are not proposed for modification;

The project intends to follow all provisions of the Port Townsend Zoning Code which are not proposed for modification. The proposed modifications are thoroughly explained in the *Project Narrative*, dated August 2021 attached with this submittal.

c. All engineering design standards which are not proposed for modification;

The project proposes to follow all engineering design standards except for a few Chapter 6 - Transportation standards. The modifications are thoroughly explained in the *Project Narrative*, dated August 2021 attached with this submittal.

d. Critical Areas Ordinance (Chapter [19.05](#) PTMC); and

The development proposes to follow the Critical Areas Ordinance. Any deviations or impacts from the standard buffers have been mitigated and analyzed through the *Critical Areas Report and Mitigation Plan* by Wetland Resources, dated August 2021, in accordance with Chapter 19.05 PTMC.

e. Any other applicable city, state or federal regulations, policies, or plans, except those standards proposed for modification;

The proposed development intends to follow any other applicable city, state, or federal regulations, policies or plans, except those standards proposed for modification through the PUD process.

2. Utilities and other public services necessary to serve the needs of the proposed PUD shall be made available, including open spaces, drainage ways, streets, alleys, other public ways, potable water, transit facilities, sanitary sewers, parks, playgrounds, schools, sidewalks, and other improvements that assure safe walking conditions for students who walk to and from school;

Proposed infrastructure provides roads and utilities appropriate for fire access, domestic water, sanitary sewer, and stormwater management for the development. They will be reviewed for approval by the fire department, City of Port Townsend Engineering Department for infrastructure improvements, and City of Port Townsend review staff. Public services, such as open space, playgrounds, multiuse pathways, sidewalks, and other improvements that assure safe walking conditions are proposed throughout the development.

3. The probable significant adverse environmental impacts of the proposed PUD, together with any practical means of mitigating adverse impacts, have been considered such that the proposal will not have an unacceptable adverse effect upon the quality of the environment, in accordance with Chapters [19.04](#) PTMC and [43.21C](#) RCW;

There are several wetlands on site. The applicant's proposal anticipates mitigating wetland buffer impacts by utilizing buffer averaging. This mitigation will accommodate the placement of stormwater ponds 1, 3, and 4, a portion of lot #1, and a portion of the proposed Rainier Street in accordance with PTMC 19.04. The impacts have been analyzed and will be mitigated as discussed in the attached *Critical Areas Report and Mitigation Plan* by Wetland Resources, dated August 2021.

4. Approving the proposed PUD will serve the public use and interest and adequate provision has been made for the public health, safety, and general welfare;

Future development of the residential site will be in accordance with applicable codes and regulations will ensure protection of the public health, safety, and welfare. Proposed infrastructure provides access and utilities appropriate for fire access, domestic water, sanitary sewer, and stormwater management for the site. All structures will be constructed to the most current Port Townsend building standards. The onsite critical areas and their proposed buffers will continue to provide natural habitat and hydrology features within the City. Additionally, the project is providing multiple recreational areas and multiuse trails that will provide residents with active and passive recreation opportunities, thereby increasing the general welfare of the City.

5. The proposed PUD satisfies all criteria set forth in PTMC [17.32.070](#) through [17.32.090](#), as applicable; and

The applicant is proposing to follow PTMC 17.32.070 through 17.32.090. 17.32.070 The applicant is looking to blend R-II and R-III zoning standards, with lot sizes ranging from 3,600 SF to 5,951 SF, with an average lot size of 3,979 SF. The development is utilizing an innovative residential development technique, clustered housing. The project meets 17.32.070.D, through the provision of public recreation facilities. The recreation facilities, passive, and active open space areas, exceed the requirements.

17.32.080 is not applicable to the project, as this code section is intended for commercial uses.

17.32.090 The applicant is seeking to modify a few of the development standards through the PUD process: the minimum lot size for the R-II zone, required off-street parking spaces, and a portion of the engineering design standards. The development will not have off-street parking spaces but will provide four (4) on-site parking spaces per residential lot., thereby exceeding the required number of parking spaces. None of the 17.32.090.B standards are proposed to be modified. The project will utilize the allowed modifications to provide a higher level of public benefits than a conventional development would allow.

6. The proposed PUD will be superior to or more innovative than conventional development and will provide greater public benefit without additional probable significant adverse impacts to public health, safety, or the environment, than available through the use of conventional zoning and/or development standards.

The proposed PUD is superior and more innovative than conventional developments because of the multiple special recreational amenities proposed, the proposed construction of the Rainier Street improvements, the preservation of more than 13.5 acres of permanent open space, and maintenance of significant critical areas as natural habitat. Additionally, the

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development will include a Victorian era theme in its decorative elements ranging from lighting, benches, landscaping, and a courtyard feature along Madrona Blvd. The Victorian era elements are proposed to naturally incorporate the new development with Port Townsend's historic character and create a sense of place. Overall, the applicant is proposing a superior development that will provide Port Townsend's current and future residents with an enhanced multimodal transportation network in a manner that clearly embodies the intent of the Comprehensive Plan's Community Direction statement to create communities with a sense of history, that prizes its natural setting, and be a great place to live.

B. Notwithstanding approval criteria set forth in subsection A, in accordance with RCW [58.17.120](#), as now adopted and hereafter amended, a proposed PUD may be denied because of flood, inundation or swamp conditions. Where any portion of the proposed PUD lies within both a flood control zone, as specified by Chapter [19.05](#) PTMC and Chapter [86.16](#) RCW, and either the one percent flood hazard area or the regulatory floodway, the city shall not approve the PUD unless it imposes a condition requiring the applicant to comply with Chapter [19.05](#) PTMC and any written recommendations of the Washington Department of Ecology. In such cases, no development permit associated with the proposed PUD shall be issued by the city until flood control problems have been resolved.

Requirement noted. The site does not lie within a flood control zone.

We look forward to working with your staff for this project. Should you have any further questions or would like clarification on any information, feel free to contact me at any time at (253) 838-613.

Sincerely,

ESM CONSULTING ENGINEERS, LLC



NOHELY MORENO, MS
Planner

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