

## 2023 Comprehensive Plan Amendments Findings and Conclusions

### Findings of Fact

1. **Proposal:** The City of Port Townsend proposes amendments to various sections of the Comprehensive Plan and Municipal Code. The amendments relate to:
  - a. Increasing affordable housing capacity in the High Density Multifamily, Neighborhood Mixed Use Center, Community Mixed Use Center, and Mixed Commercial/Light Manufacturing Subarea Zones.
2. **Location:** The proposed amendments apply throughout the City of Port Townsend.
3. **Environmental Review:** Amendments to the land use/development regulations are subject to review under the State Environmental Policy Act (SEPA). The SEPA Responsible Official issued a Determination of Non-Significance (DNS) (Exhibit B) on August 23, 2023. The SEPA comment period will expire on September 12, 2023.
4. **Commerce Review:** The City must notify the WA Department of Commerce of any proposed amendments to the comprehensive plan or development regulations. The City submitted the proposed amendments to Commerce on August 21, 2023. The City is awaiting further response from Commerce.
5. **Planning Commission Review:** Per PTMC Section 20.04.080 Planning Commission Hearing and 20.04.090 C. Planning Commission Review, the Planning Commission shall hold a public hearing on any Comprehensive Plan final docket and text amendments to the land use code. The Planning Commission must make a recommendation to City Council using the decision criteria set forth in PTMC 20.04.080.A.3. In accordance with PTMC Section 20.04.090(B), notice of the public hearing will be posted and published on August 23, 2023.
6. **Meetings:** Staff presented and refined amendments with the Planning Commission and City Council on the following dates:
  - May 25, 2023, Planning Commission Regular Meeting
  - June 8, 2023, Planning Commission Regular Meeting
  - June 22, 2023, Planning Commission Regular Meeting
  - July 3, 2023, City Council Regular Meeting
  - July 12, 2023, Planning Commission Special Meeting
  - July 19, 2023, Planning Commission Special Meeting
  - July 26, 2023, Planning Commission Special Meeting
  - August 9, 2023, Planning Commission Special Meeting
  - August 23, 2023, Planning Commission Special Meeting
7. **Public Hearing:** Public Hearings are scheduled on the following dates and will be duly noticed in the paper of record at least 10 days in advance of each hearing:
  - September 14, 2023 Public Hearing before the Planning Commission
  - September 28, 2023, Planning Commission Final Action on Proposed Comprehensive Plan Amendments
  - October 2, 2023, Public Hearing before City Council
  - October 16, 2023, City Council Second Reading of Proposed Comprehensive Plan Amendments

### Findings and Conclusions

- a) **Whether the amendment will adversely affect the public health, safety and welfare in any significant way.**

**Finding:** The SEPA Responsible Official has reviewed the proposed amendments and issued a Determination of Non-Significance.

**Conclusion:** PCD Staff conclude that the proposed amendments will not adversely affect the public health, safety, and welfare in any significant way.

**b) Whether the proposed amendment is consistent with the GMA and adopted county-wide planning policies.**

**Finding:** The proposed amendment enacts the following GMA goals and CWPPs:

GMA Goal 1: "Urban growth. Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner." And CWPP #1: "The designation of urban growth areas (UGAs)."

The proposed amendments incentivize development in underdeveloped urban areas with sufficient public facilities and services.

GMA Goal 2: "Reduce sprawl. Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development" and CWPP #2: "Promotion of contiguous and orderly development and the provision of services to such development."

The proposal is for concentrated, high-density development in areas that can support more units.

GMA Goal 3: "Transportation. Encourage efficient multimodal transportation systems that are based on regional priorities and coordinated with county and city comprehensive plans" and CWPP #5: "County-wide transportation facilities and strategies."

The proposed amendments include a reduction in minimum parking requirements in specific high-density zones to encourage greater use of non-motorized transportation and the county-wide public transit system.

GMA Goal 4: "Housing. Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock" and CWPP #6: "The need for affordable housing for all economic segments of the population."

The proposed amendments permit greater housing densities in regions where developers, particularly developers of affordable housing, cannot afford to build at current density levels. The amendments will increase housing stock and encourage development of affordable housing units.

GMA Goal 5: "Economic development. Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities" and CWPP #7: "County-wide economic development and employment."

The proposed amendments address barriers to economic development in specific land use zones. Developers report that they cannot afford to build on mixed use zones because the balance of residential to commercial space is not viable for their funding sources, leaving these properties undeveloped. The undeveloped mixed-use properties are not serving as local businesses or residences, hampering economic development.

Similarly, zones allowing high-density residential developments remain undeveloped because developers cannot afford to build unless the total number of units is high enough that renting them will absorb unexpected development costs. Port Townsend and Jefferson County lack sufficient housing, meaning that local industries do not have a local workforce.

GMA Goal 6: “Property rights. Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.”

The proposed amendments do not take private property or remove currently allowed uses from privately held property.

GMA Goal: “7) Permits. Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.”

The proposed amendments do not impact permit application processes or timelines.

GMA Goal 8: “Natural resource industries. Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands, and discourage incompatible uses.”

The proposed amendments do not impact natural resource industries.

GMA Goal 9: “Open space and recreation. Retain open space, enhance recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.”

The proposed amendments encourage development in high-density areas that are adjacent to open space, allowing residents access to recreational areas without development sprawling into natural areas.

GMA Goal 10: “Environment. Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.”

The proposed amendments do not impact air or water quality or availability.

GMA Goal 11: “Citizen participation and coordination. Encourage the involvement of citizens in the planning process and ensure coordination between communities and jurisdictions to reconcile conflicts.”

The proposed amendments do not impact citizen participation. However, citizens have provided feedback on the draft amendments through meetings with the Planning Commission and other opportunities for public comment.

GMA Goal 12: “Public facilities and services. Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.”

The proposed amendments propose increasing density in zones that are underdeveloped, meaning that increased demand for public facilities and services will remain in proportion to levels planned in the Comprehensive Plan.

GMA Goal 13: “Historic preservation. Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance.”

The proposed amendments do not impact historic preservation.

**Conclusion:** Staff conclude that the proposed amendments are consistent with both the GMA and the CWPPs.

**c) Whether the proposed amendment reflects current widely held community values or resolves inconsistencies in the city's comprehensive plan.**

**Finding:** City Council and Planning Commission meetings are largely focused on the need for more housing and more affordable housing. Public comment shows that Port Townsend residents are highly concerned about having sufficient housing in their community. Business owners share that they are losing employees who cannot find housing. Developers report that they cannot build needed housing under current height and density restrictions. The proposed amendment reflects the community's widely held value of providing affordable housing for all economic segments of the City.

**Conclusion:** Staff concludes that the proposed amendments support the widely held community value of housing access.

**d) Whether the proposed amendment would maintain the appropriate balance of land uses within the city.**

**Finding:** The proposed amendments to the Comprehensive Plan do not alter the balance of land uses within the City. The proposed increases to height and density do not alter land uses, only encourage concentrating residential use in zones that already permit multifamily housing.

**Conclusion:** Staff concludes that the proposed amendments will maintain the appropriate balance of land uses within the city.

**e) Whether the proposal implements the comprehensive plan; or alternatively**

**f) Since the adoption of the comprehensive plan, there has been a substantial change in circumstances related to the proposed amendment and/or the area in which it is located which warrants the proposal.**

**Finding:** The proposed amendments implement the following sections of the comprehensive plan:

*Comprehensive Plan Direction Statement:* "a great place to live," with a "wide choice of housing types and prices is available for a diversity of lifestyles and incomes. Residential development is centered in distinct neighborhoods." The proposed amendments support styles of high-density housing that are not currently feasible in the City, centered in distinct neighborhoods.

*Comprehensive Plan Chapter 4 Land Use Element:* per Goal 9, "accommodate the population growth objectives for the City of Port Townsend and further the objectives of the Housing Element of this Plan," allow development in the currently underutilized R-IV High Density Multi-Family, C-I/MU Neighborhood Mixed Use Center, C-II/MU Community Mixed Use Center, and M/C Mixed Light Manufacturing and Commercial in the Rainier Subarea. The amendments also implement Goal 10, providing "adequate commercial land to conveniently serve community needs while maintaining Port Townsend's small town atmosphere" by encouraging the development of commercial uses in mixed-use zones. This also contributes to Goal 12, encouraging "the creation of mixed use centers that combine commercial and residential land uses, providing an opportunity to develop areas in Port Townsend that are transit-oriented and pedestrian friendly and offering opportunities for affordable housing, convenience shopping, and quality design."

*Comprehensive Plan Chapter 5 Housing Element:* providing more housing stock is an essential part of OlyCAP and Jefferson Shelter to Housing Partnership's 10 Year Plan to

End Homelessness in Jefferson County, WA. This includes enacting Goal 1, providing an “adequate supply of housing for residents of all income groups, including sufficient housing affordable to low and moderate income groups.” The proposed amendments encourage Goal 2, promoting “the provision of affordable housing throughout all geographic and economic segments of the community” because developers cannot currently afford to build affordable units unless they are allowed to build more total units that will absorb the costs of permanently affordable units. These amendments “promote a variety of housing choices” per Goal 4. Developing these specific zones also makes them more suitable for “the development of housing opportunities for low income and special needs populations” per Goal 5. The amendments implement Goal 6 by increasing development opportunities in mixed use zones that will “promote a balance of housing and employment opportunities.” Per Goal 7, these higher density residential developments are located within the City’s urban core instead of sprawling out. Finally, per An Affordable Housing Strategy for Port Townsend, the amendments re-evaluate development standards to maintain public health and safety while reducing development costs as a barrier to affordable housing.

*Comprehensive Plan Chapter 6 Transportation Element:* The proposed reduction in parking minimums enacts Goal 9, “Encourage the City, transit, and private interests to establish coordinated parking strategies to achieve overall transportation goals and to ensure that parking standards do not act as a deterrent to new development or redevelopment.”

*Chapter 8 Capital Facilities Element:* Per Goal 4, “Ensure that water, wastewater, stormwater, and transportation facilities are provided concurrent with new development, based on the City’s adopted level of service standards” and Goal 5, “Provide needed public facilities within the City’s financial capabilities or within the City’s authority to require others to provide such facilities,” developments under these proposed amendments must be served by utilities and public facilities in concurrence with the project’s development.

*Chapter 9 Economic Development Element:* The proposed amendments make developing the M/C(S) and mixed use zones more affordable and appealing to developers, which means these zones can be used by local businesses to implement Goal 1, fostering “a balanced, diversified, and sustainable local economy that contributes to Port Townsend’s high quality of life.”

*Rainier Street & Upper Sims Way Subarea Plan:* The proposed amendments to M/C(S) implement Goal LU.4, ensure a variety of housing options and living environment choices are provided throughout the subarea.” They also implement Goal LU.5, “provide family-wage employment by promoting a variety of manufacturing and commercial uses across the subarea” by encouraging development in this area, which has not seen the predicted level of development since its creation.

The proposed amendments also address how housing access has substantially changed. When the Port Townsend comprehensive plan was updated in 2015, housing was one of several primary concerns, along with attracting businesses and supporting economic growth. Since then, housing became a primary concern across income levels, political groups, and geographic areas.

The housing crisis is a national problem that is deeply felt in Port Townsend. The city needs local solutions.

**Conclusion:** Staff concludes that the proposed amendments implement the Comprehensive Plan’s goals for community direction, land use, housing, transportation, capital facilities, and economic development. The amendments also implement the Rainier Street & Upper Sims Way Subarea Plan.

**Recommendation**

Port Townsend Community Development Staff RECOMMENDS APPROVAL of the amendments to various sections of the Comprehensive Plan to

Respectfully submitted on behalf of Port Townsend Planning and Community Development,

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List of Exhibits