

# SECTION 3.

## Land Development Review and Evaluation



# **Chapter 13. Land Development Review and Evaluation**

## **13.1 Introduction**

Each county required to plan under GMA must designate an urban growth area or areas within which urban growth shall occur and outside of which urban growth shall not be allowed. Urban growth areas are to be sized based upon the projected 20-year population growth forecast generated by the Washington State Office of Financial Management. All cities planning under GMA must be included in an urban growth area.

In 1998, Kitsap County allocated a 20-year population forecast of 14,808 total population to the City of Poulsbo. The City prepared a land capacity analysis to estimate how many people could be accommodated within the city limits to meet this growth allocation. This analysis concluded that there was not enough developable land within the city limits to accommodate the projected 20 year growth. In accordance with Kitsap County's 1998 Comprehensive Plan urban growth area policies, the City and County embarked on a joint planning process to determine the size and shape of Poulsbo's unincorporated Urban Growth Area.

The Poulsbo Subarea Plan was developed through a joint City/County process to address and resolve the issues identified in the 1998 Kitsap County Comprehensive Plan related to the designation of a Poulsbo UGA. A land capacity analysis was included in the Poulsbo Subarea Plan to "show the work" in establishing the Poulsbo UGA. The analysis followed the County's adopted land capacity methodology at that time.

In 2002, the Kitsap County Commissioners and Poulsbo City Council adopted the Poulsbo Subarea Plan and the designation of the Poulsbo Urban Growth Area. The Poulsbo UGA is the primary area where the City may provide urban services and property may be annexed into its city limits.

Further, in 2004 when the Kitsap Regional Coordinating Council adopted new population allocations for cities and urban growth areas, Poulsbo's total population of 14,808 was not altered (Kitsap Countywide Planning Policy Appendix B); this was due to the intensive joint planning process and adoption of the Poulsbo Subarea Plan that had recently occurred and to allow the urban planning policies time to be implemented. **And in 2016, the total population of 14,808 continues to be the population allocation for Poulsbo and urban growth area.**

Key to the success of the GMA is ensuring that the densities planned and assumed in the designation of urban growth areas, are being achieved when residential projects are submitted to and approved by jurisdictions. The state legislature recognized this, and in 1997 adopted an amendment to the Growth Management Act, commonly referred to as

the “Buildable Lands” amendment.

The amendment, codified in RCW 36.70A.215, requires certain counties and their cities to monitor development activities ~~periodically through five year periods~~ and conduct a coordinated housing unit and employment capacity analysis for each jurisdiction.

Much of the emphasis in the Buildable Lands Program focuses on the collection and monitoring of annual development data in order to evaluate whether or not population and employment allocations are being met. Further, through the Buildable Lands reporting requirements, a substantial amount of data is collected that assists local jurisdictions in evaluating the effectiveness of their adopted comprehensive plans and associated development regulations.

Kitsap County and its cities are required by state law to participate in the Buildable Lands monitoring program. Kitsap County is the lead agency implementing the program.

**There have been two Buildable Lands Report (BLR) since the adoption of the Poulsbo Subarea Plan that the City has participated in – the 2007 BLR and the 2014 BLR. These reports meet the official requirements of GMA’s Buildable Lands reporting.**

~~Kitsap County adopted the 2007 Buildable Lands Report (BLR) in spring 2008, which evaluated development data from 2000-2005 for Kitsap County and its cities. This Report meets the official requirements of GMA’s Buildable Lands reporting.~~

~~However, For purposes of Poulsbo’s 2009 Comprehensive Plan update, this chapter was included to provides a detailed analysis of land development in Poulsbo since 2002 when the Poulsbo Subarea Plan was adopted and the Poulsbo UGA was designated. This effort was made to review and evaluate how the City’s growth strategies are working. The conclusion in the 2009 Comprehensive Plan is that the City’s growth strategies worked, and there remained sufficient land for the City’s population forecast.~~

**In 2013-2014, the City participated in Kitsap County’s Buildable Lands Report data collection and reporting; this effort was intended to be in preparation for the 2016 Comprehensive Plan Periodic Update. Chapter 13 is updated to include the buildable lands and land capacity analysis data that is included in Kitsap County 2014 Buildable Lands Report.**

The following sections provide the results of three evaluation efforts:

- The first section provides the summary of Poulsbo’s reporting included in the 2014 Kitsap Buildable Lands Report. In addition, the City has updated its land development report of approved residential projects from the 2009 Comprehensive Plan update to September 2016. every residential project approved since 2002, and its gross and net density achieved to determine whether the City has been meeting its required and planned residential densities. This

~~section further depicts, from those approved projects, how many residential certificates of occupancy have been issued since 2002.~~

- The second section is an updated land capacity analysis for the city limits and unincorporated urban growth area ~~as included in the 2014 Kitsap County Buildable Lands Report~~. This evaluation was completed to determine what extent the increased buffer requirements of the City's 2007 Critical Areas Ordinance would have on available land for future development. While the Poulsbo Subarea Plan remains adopted and valid for purposes of the Poulsbo UGA, this land capacity analysis was made to evaluate the availability of usable land to accommodate the City's adopted population allocation of 14,808.
- Reasonable Measures Evaluation is the third and final section. This section was performed as required by RCW 36.70A.215. Before an adjustment to the Poulsbo UGA can be contemplated, reasonable measures must be identified and implemented.

## 13.2 Land Development Monitoring

### 13.2.1 *2014 Kitsap County Buildable Lands Report - Poulsbo*

#### *Evaluation of Approved Residential Projects 2006-2012 since 2002*

Table 13-1 below summarizes all of the residential projects approved by the City ~~2006-2012 (the designated BLR reporting period)~~ since 2002 in total number of lots, gross acres, net acres, gross density and net density. ~~Appendix C-1 provides the detailed project by project spreadsheet for all residential projects. There were 12 final plats, 14 short plats and 1 testamentary subdivision recorded in the reporting period.~~

**Table 13-1 Summary of City's approved residential projects 2006-2012 since 2002-2008**

Land Use Designation/ Zoning District	Lots/Units Approved	Gross Acres	Net Acres	Avg. Gross Density	Avg. Net Density
Residential Low 4-5 du/acre (34 projects)	<u>555</u> 1060	<u>121.37</u> 246.35	<u>76.95</u> 174.75	<u>4.57</u> 4.3	<u>7.21</u> 6.1
Residential Medium 5-10 du/acre (1 project)	<u>3*</u> 40	<u>26.17</u> 1.03	<u>12.33</u> .82	<u>0.11</u> 9.7	<u>0.24</u> 12.2
Residential High 10-14 du/acre (6 projects)	<u>10</u> 121	<u>8.13</u> 18.87	<u>4.45</u> 9.49	<u>1.23</u> 6.4	<u>2.24</u> 12.8
Redevelopment District (Poulsbo Place)	<u>122</u>	<u>11.59</u>	<u>8.25</u>	<u>10.53</u>	<u>14.78</u>

	199	15.09	12.53	13.2	15.9
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Source: Poulsbo Planning Department and Kitsap County Buildable Lands Report 2014

\* Seven lots were created in the Residential Medium zone during the reporting period; however, 3 lots were for future residential development.

The Central Puget Sound Growth Management Hearings Board has made a distinction between gross acres and net acres, especially for purposes of calculating density. The CPSGMHB allows for the reduction from gross acres the land needed for rights-of-way, storm water management/treatment facilities, designated open spaces and critical areas.

Therefore, net density is expressed as a number of residential dwelling units per acre of adjusted land in a residential development. It is density based on net acreage that the CPSGMHB has ruled is the appropriate number for determining whether urban densities are being achieved.

Figures 13-1 and 13-2 graphically illustrate City of Poulsbo planning permit approved projects by year and type since 2002. These figures correspond with detailed residential project spreadsheet table in Appendix C-1.

### **Residential Building Permits Issued**

**During the Buildable Lands reporting period, there were no permits issued for new multi-family development. The following table identifies single-family building permits issued during the reporting period by zoning district in which a certificate of occupancy was also issued.**

**Table 13-2: 2006-2012 Poulsbo Residential Building Permits**

Zoning District	Total Acreage	Number of Units	Achieved Density
<u>Residential Low</u>	<u>75.5</u>	<u>473</u>	<u>6.26</u>
<u>Residential Medium</u>	<u>0</u>	<u>0</u>	<u>N/A</u>
<u>Residential High</u>	<u>0.57</u>	<u>4</u>	<u>7.01</u>
<u>Redevelopment Zone</u>	<u>6.13</u>	<u>84</u>	<u>13.70</u>

Source: Poulsbo Planning Department

**These figures indicate that the City did not have many projects in the RM or RH zoning district during the BLR reporting period. The homes approved in the RH zoning district were from one short plat that was recorded prior to the City requiring developments in the RM and RH zoning district meet minimum zoned density. In future BLR reporting, the City anticipates seeing RM and RH projects**

**meet density due to its new code updates that require minimum density to be achieved.**

The conclusions of the density evaluation of approved residential projects **2006-2012** since 2002 are:

**The City's growth strategies have worked.** The land use designation density ranges, minimum density requirements and incentives for clustering and infill have worked for the City to obtain an average net density of 7 units per net acre. This overall density is completely consistent with vision, goals and policies of the Poulsbo Subarea Plan and City's 1994 Comprehensive Plan.

**The City is meeting its density target identified in the Poulsbo Subarea Plan for the RL designation/zoning district.** The Poulsbo Subarea Plan identified a 5 du/net acre density target for the RL district (after consideration of critical areas and other reduction factors). The evaluation of all residential projects concludes that an average density of **7.21** ~~6.1~~ du/net acre was achieved in the RL district. Contributing to this density was the use of the planned unit development bonus density provisions on a number of projects; **of the 12 recorded final plats reported, 6 were under the PUD provisions.** However, it should also be highlighted that many standard subdivision projects were able to obtain land efficiency and achieve density at or above 5 du/net acre. **The City updated its zoning code provisions in 2007, and again in 2013, which will impact future development trends in Poulsbo. The 2007 update removed the Planned Unit Development (PUD) code provisions and replaced them with the Planned Residential Development (PRD) regulations.** The PRD standards require a public benefit in exchange for a density bonus and recent submittals have not included requests for bonus density. Projects will still be held to the minimum density of 4 dwelling units per net acre. The maximum density in the RL zone is 5 dwelling units per gross acre.

**Single family detached** in the City's Residential Low land use designation/zoning district **continues to be the primary housing type,** as **56%** ~~81%~~ of the new lots/units approved **2006-2012** since 2002 are in the RL district. This is to be expected as the RL district encompasses **63%** ~~62%~~ of the entire City's zoned acreage, including non-residentially zoned land. Clearly, the density range of 4-5 dwelling units per gross acre in the RL zoning district, as expressed through single-family detached housing units, is intended to be the primary land use in the City of Poulsbo.

**The projects approved in the Residential Medium and Residential High zoning district are of mixed results.**

**There were a total of four short plats that approved 10 lots during the BLR reporting period in the City's Residential High Zone. Out of all recorded short plats, 4 lots were approved for single-family units. The other 6 lots are intended for future development. The apparent low density reported is not particularly relevant because the larger lots separated out are intended for future development at the**

density range allowed in the Residential High zoning district (11-14 dwelling units/acre). If all 4.45 acres of net developable acreage is developed at a density of 14 dwelling units/net acre, it is likely that the properties could accommodate approximately 62 new dwellings.

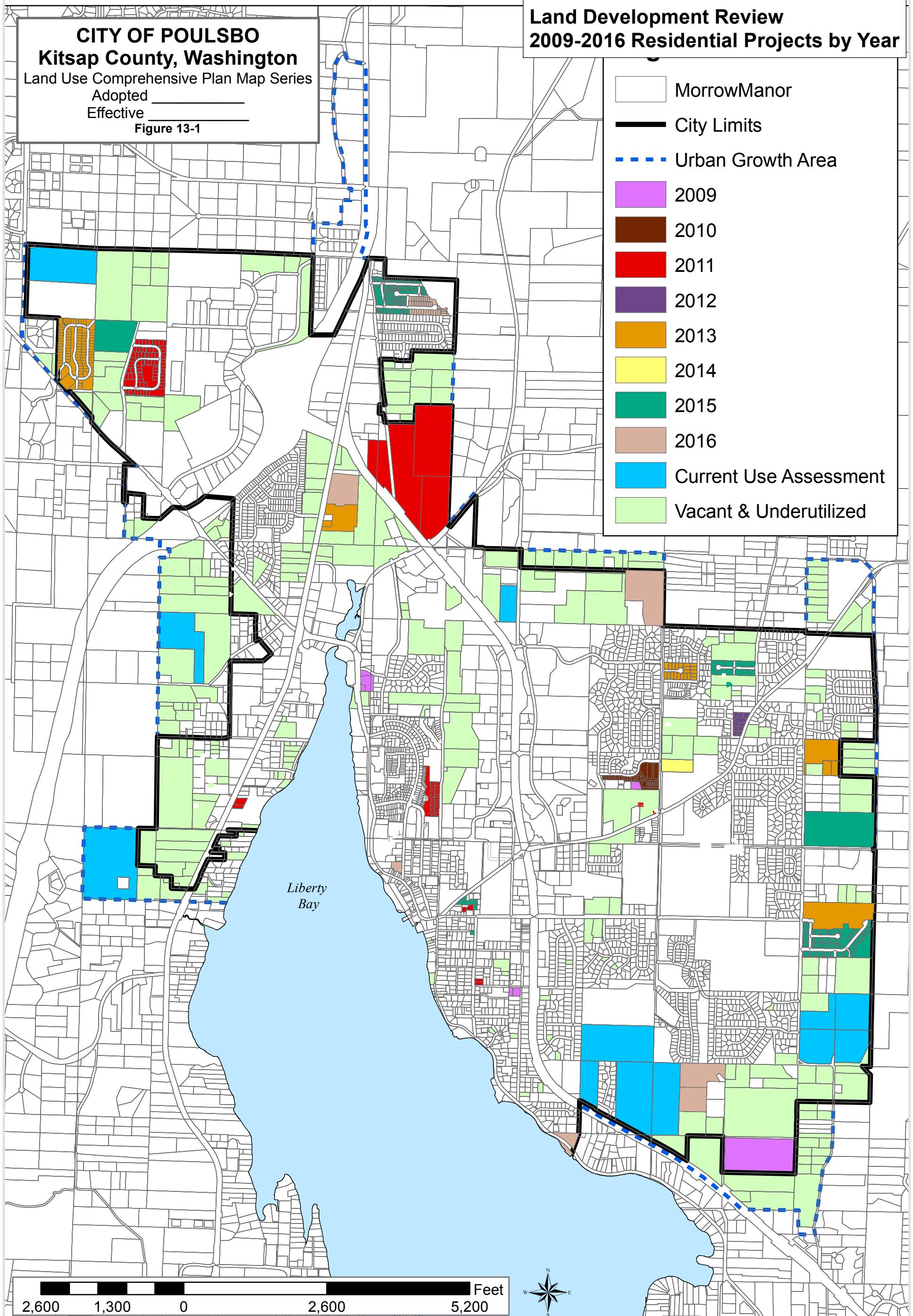
The City did not see many projects proposed in the multi-family zoning districts during the BLR reporting period, but it is likely that future projects will benefit from increase flexibility in housing types and a requirement to meet minimum density standards.

Over half of the projects approved in the RH zoning district did not meet the Poulsbo Subarea Plan density target of 14 du/net acre, those primarily being short plat applications. The other projects proposed as high density projects, either met or were very close to the 14 du/net acre target. One project was approved in the RM zoning district, and it did meet its density target of 10 du/net acre. Minimum density requirements, incentives to develop multi family units (rather than single family detached in these higher density zones), and flexibility in development standards were all strategies adopted in the 2007 zoning ordinance amendments for the RM and RH zoning districts—intended to ensure future development will achieve higher densities in these districts.

### **13.2.2 Residential Development Review 2009-2016**

While GMA requires the official reporting of development permit monitoring be completed through the regional Buildable Lands Reporting (BLR) program, Poulsbo also monitors its approved projects annually, and provides periodic updates to elected officials, businesses, citizens and other interested parties. Permit monitoring provides a snapshot of what has been approved for development and is helpful in capital facility planning and prioritization, it should also be noted that the economic market has influence on whether the approved projects become reality. Some projects which are approved expire before recording or development occurs.

Figure 13-1 depicts the residential projects approved by the City of Poulsbo by year from 2009 through September 2016. Figure 13-2 depicts these same projects and identifies the type of residential permit that was approved.



Comprehensive Plan map Series Primary Map Sources and original Scales:  
Kitsap County Assessor's Tax Maps (Kitsap County IT, GIS Division)  
City of Poulsbo Planning Department records were used to develop project list from 2009-2015

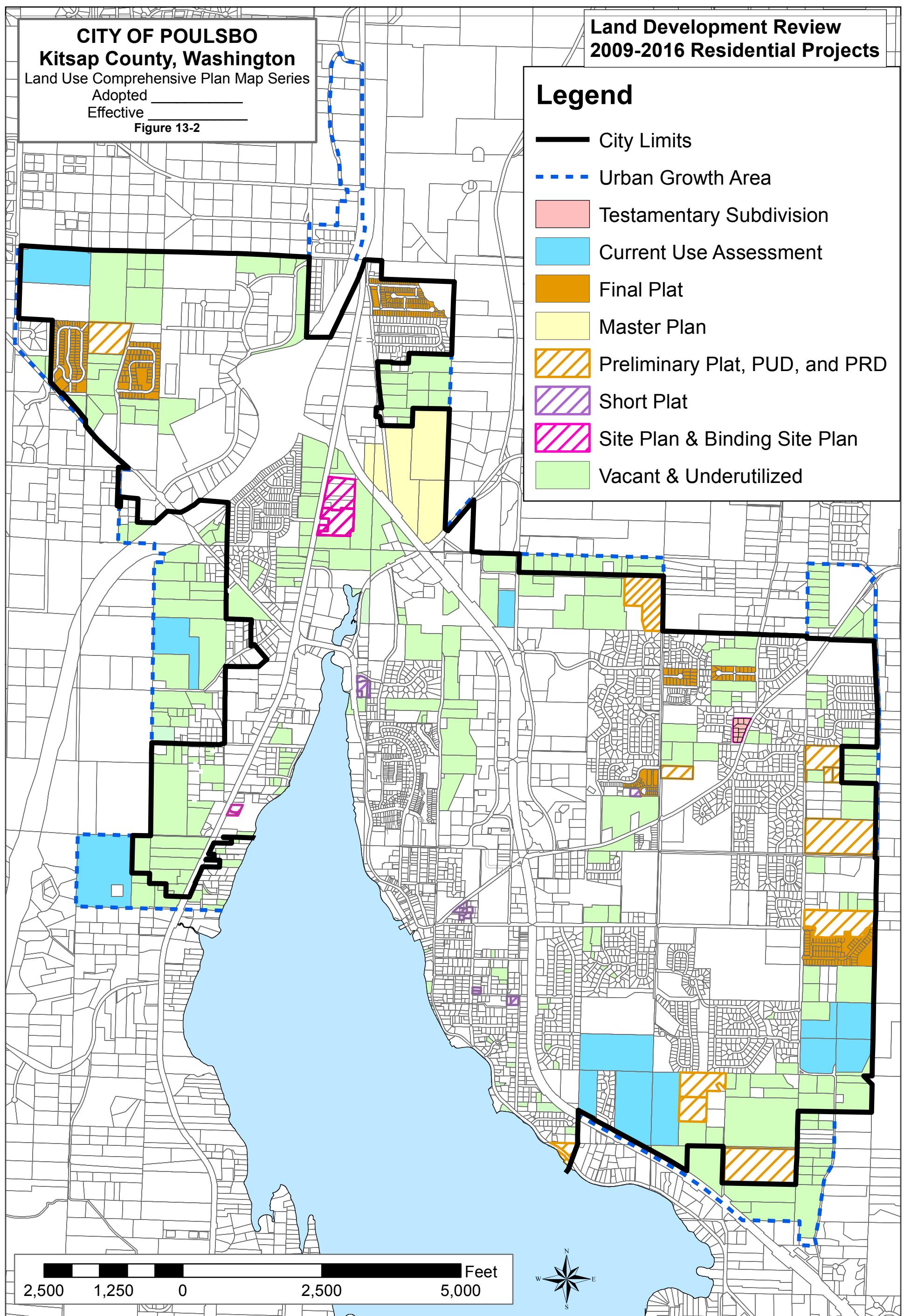
This comprehensive plan map series is intended for general comprehensive planning. These maps are schematic representations of physical features, infrastructure, and land ownership boundaries. The map information was derived from available public records and existing sources, not from surveys. Studies may be necessary with project review to verify information.

**CITY OF POULSBO**  
**Kitsap County, Washington**  
 Land Use Comprehensive Plan Map Series  
 Adopted \_\_\_\_\_  
 Effective \_\_\_\_\_  
 Figure 13-2

**Land Development Review**  
**2009-2016 Residential Projects**

**Legend**

- City Limits
- - - Urban Growth Area
- Testamentary Subdivision
- Current Use Assessment
- Final Plat
- Master Plan
- Preliminary Plat, PUD, and PRD
- Short Plat
- Site Plan & Binding Site Plan
- Vacant & Underutilized



Comprehensive Plan Map Series Primary Map Sources and original Scales:  
 Kitsap County Assessor's Tax Maps (Kitsap County IT, GIS Division)  
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City of Poulsbo Planning Department GIS  
 September 14, 2016

**Table 13-3 provides details on the residential project approvals depicted in Figures 13-1 and 13-2, and provides additional data from the BLR 2006-2012 reporting period, showing an increase in residential projects approved from 2013-2016, including a number of multi-family developments. Project specific data is included in Appendix C-1.**

**NEW Table 13-3 Residential Projects Approved 2009-2016**

Zoning District	Acreage Lots/Units	2009	2010	2011	2012	2013	2014	2015	2016 (Sept)
RL	Gross Acreage	19.89	5.23	17.2	2.14	65.43	2.96	40.81	29.45
	Net Acreage	10.48	5.23	14.8	2.14	41.71	2.24	23.46	21.63
	Lots/Units	85	34	72	10	305	13	213	126
	Gross Density	4	6.5	4	4.7	4.6	4	5	4
	Net Density	8	6.5	5	4.7	7	5.8	9	6
RM	Gross Acreage	1.68	N/A	46	N/A	N/A	N/A	N/A	N/A
	Net Acreage	1.68			33.34				
	Units	18			540*				
	Gross Density	11			12				
	Net Density	11			16				
RH	Gross Acreage	N/A	N/A	N/A	N/A	6.38	N/A	N/A	6.67
	Net Acreage					.79			4.35
	Lots/Units					18			91
	Gross Density					3			14
	Net Density					22			20
RDZ	Gross Acreage	N/A	N/A	4.19	N/A	N/A	N/A	N/A	N/A
	Net Acreage				2.22				
	Lots/Units				32				
	Gross Density				8				
	Net Density				14				
C**	Gross Acreage	N/A	N/A	.87	N/A	N/A	N/A	.74	N/A
	Net Acreage			.87				.74	
	Units			8				58	
	Gross Density			9				78	
	Net Density			9				78	

\* Master Plan approval    \*\* These projects are mixed use buildings in C zoning district; no minimum or maximum density requirements are established for mixed use buildings.    Source: Poulsbo Planning Department

**Table 13-4 summarizes the annual data in Table 13-3, and identifies the total number residential lots or units approved, and the densities achieved by zoning district. A few trends can be observed after the BLR reporting period, especially in the RM and RH zoning districts, where net densities were easily achieved, and the RL zoning district's net density remained consistent at 7 du/net acre.**

**NEW Table 13-4 Summary of Residential Projects Approved 2009-2016 (Sept.)**

Zoning District	Approved Lots/Units	Total Gross Acreage	Overall Residential Density per Gross Acre	Total Net Acreage	Overall Residential Density per Net Acre
<b>RL</b>	858	183	5	122	7
<b>RM</b>	558	47.68	12	35.02	16
<b>RH</b>	109	13.05	8	5.14	21
<b>RDZ</b>	32	4.19	8	2.22	14
<b>C</b>	66	1.61	41	1.61	41

*Source: Poulsbo Planning Department*

**Evaluation of Certificates of Occupancy issued since 2002**

The review of approved planning permits since 2002 is important to determine whether the density targets of the Poulsbo Subarea Plan are reasonable and achievable. This evaluation gives useful information to City leaders regarding their adopted growth strategies and provides insight into housing market trends in Poulsbo. It helps highlight any need for modifications to development standards or incentives (such as was done in 2007 for the RM and RH zoning districts).

However, the fact that planning permits are approved by the City does not guarantee all the approved projects will be developed. The other side of the equation is the housing market; since planning permits have time limits, if the market waits too long to develop housing units, planning permits will often expire.

Therefore, to determine what has been developed and occupied from the list of approved planning permits, an evaluation of residential certificates of occupancy issued throughout the city since 2002 was made. An intensive hand count of all residential building permits and certificates of occupancy was made in late 2008 to guarantee the most accurate information.

Figure 1-3 graphically illustrates residential certificates of occupancy (COs) issued in Poulsbo by year. (Residential building permits issued by Kitsap County before annexations are also depicted). The majority of the COs issued by the City occurred in final platted subdivisions. The main plats include Poulsbo Place, Meredith Heights, Alasund Meadows, Vetter Homestead and Stendahl Ridge. Several smaller plats,

~~primarily located on the east side of the city, were also built during this time. From 2002–2008, 630 residential COs were issued. These COs were for a total of 741 residential dwelling units.~~

~~Poulsbo's annual population estimate provided by the Washington State Office of Financial Management (OFM) each summer is largely based upon the number of residential certificates of occupancy issued by the City. This annual population is the definitive representation of how the City is growing—not the number of units approved through planning permits.~~

~~The conclusions of the evaluation of certificates of occupancy issued by the City since 2002 are: The majority of new residential units were **constructed in final platted subdivisions**, as opposed to infill or redevelopment in existing neighborhoods.~~

~~When the number of occupancy permits issued on an annual basis is considered, (see Figure 13-3 legend), a **continual, stable and manageable rate of growth in the city is observed**. While development of larger projects may lend to a perception that the city is growing at a fast rate, Figure 13-3 illustrates that a gradual and citywide distribution of housing units over the past six years has occurred.~~

## **13.3 Poulsbo Land Capacity Analysis**

### **Land Capacity Analysis Methodology**

Kitsap County's adopted Land Capacity Analysis (LCA) methodology has undergone modifications and refinements since the County's initial comprehensive plan adoption in 1995. The following provides the chronology of the LCA journey, how it has been applied in Poulsbo's past comprehensive planning, and the current methodology applied to this comprehensive plan's update.

#### **1998 Kitsap County Comprehensive Plan**

In 1998, Kitsap County adopted a comprehensive plan that included a land capacity methodology and reduction factors. This methodology and reduction factors were accepted by the CPSGMHB (the 1998 plan was in response to original and subsequent appeals of the 1995 Kitsap County Comprehensive Plan, of which land capacity reduction factors were one of the items appealed).

#### **Poulsbo Subarea Plan**

Kitsap County's 1998 land capacity methodology was used in the development of the Poulsbo Subarea Plan and the ultimate sizing of the Poulsbo Urban Growth Area. On page 20 of the Poulsbo Subarea Plan, Table 1 summarizes the reduction factors used in the land capacity analysis.

Certain variables in the County's 1998 land capacity methodology were refined when applied to the city limit's population capacity. Three different variables were utilized by the city based on Poulsbo specific circumstances: 1) increased critical area reduction factor based on city staff's parcel by parcel analysis of critical areas impact on available land within the city limits; 2) a slightly smaller household size than assumed by Kitsap County; and 3) high end of zoning districts' density range utilized when calculating population capacity.

Other than these agreed upon variable differences, the methodology and other reduction factors utilized in calculating the city limit's holding capacity and the unincorporated UGA land capacity analysis, was as set forth in the County's 1998 Plan.

#### **Kitsap County-wide Planning Policy**

The Kitsap Countywide Planning Policies includes policies regarding land capacity methodology. Urban Growth Areas (UGA) Policy 1 requires a coordinated Land Capacity Analysis approach which meets the requirements of GMA 36.70A.215, commonly known as "Buildable Lands." Specifically, the policies state:

##### **Policy 1. Land Capacity Analysis Program:**

- a. The County and the Cities shall maintain a Land Capacity Analysis Program using consistent, agreed upon methodology to estimate the land

~~supply available to accommodate future residential, commercial, and industrial growth.~~

- ~~b. The County and Cities shall participate in an agreed upon Buildable Lands Analysis Program to monitor and evaluate the effectiveness of their respective Comprehensive Plans.~~
- ~~c. The County and Cities shall establish procedures for resolving disputes in collection and analysis of Land Capacity data. In the event a resolution cannot be achieved, the Kitsap Regional Coordinating Council shall be a forum to review and if possible facilitate any disputes between parties.~~

#### **Kitsap County's 2005 Updated Land Capacity Analysis**

~~Kitsap County initiated updating its Land Capacity Methodology by hiring a consultant and convening a Citizens Advisory Group (CAG). This effort was in response to the recently adopted Kitsap Countywide Planning Policy requiring a consistent Land Capacity Analysis methodology for all jurisdictions. Representatives from all cities participated on the CAG.~~

~~The CAG's task was to evaluate the 1998's Comprehensive Plan's Land Capacity methodology's rationale and assumptions for determining residential and commercial/industrial capacity (in both urban and rural), and to thereby establish an "objective approach by which to determine the current land and how much population and development Kitsap County can expect to accommodate under current zoning and development regulations in the existing rural lands and urban growth areas (UGAs)." (2005 Updated Land Capacity Analysis at page 2).~~

~~Kitsap County's 2005 Updated Land Capacity Analysis established the rationale and assumptions for land capacity calculations. It provides "step by step" narrative on how to calculate: Densities assumed per zoning district (ULCA report at page 6); Vacant lands methodology (ULCA report at page 7); Underutilized lands methodology (ULCA report at page 12); and Calculation of total housing unit and population holding capacity for residential zones.~~

~~The 2005 ULCA public process included seven months of CAG meetings, a presentation to the KRCC Board, a public hearing before the Kitsap County Planning Commission and Board of Commissioners, with the Board making a "final framework recommendation" in April 2005. The "Kitsap County 2005 Updated Land Capacity Analysis" report was released in October 2005.~~

#### **Central Puget Sound Growth Management Hearings Board**

~~On December 19, 2005, Kitsap County adopted an ordinance amending the Kingston Subarea Plan, which included expanding the Kingston Urban Growth Area. This ordinance was appealed to the CPSGMHB, as Case No. 06 3 0007 KCRP VI v. Kitsap County.~~

Among the five main issues appealed by KCRP, one of the issues appealed was the Urban Land Capacity Analysis utilized in determining the size of the Kingston UGA. The Kingston Subarea Plan utilized the 2005 ULCA methodology.

The Petitioners raised specific arguments regarding most of the changes made in the 2005 ULCA Report from the previous methodology. The Petitioners state that “the new methodology institutes a new, more restrictive definition of ‘vacant lands,’ changes several ‘reduction factors,’ and establishes a new reduction – ‘sewer constrained lands’ – all resulting in an excessively oversized UGA.” (Page 23 Final Decision and Order.)

The Board, however, concurred with Kitsap County’s arguments on the validity of the reduction factors included in the 2005 ULCA, with one exception – sewer constrained lands. The Board’s decision states the GMA requires that urban infrastructure be available to support an urban growth area within the 20 year planning horizon, and therefore a reduction factor for “sewer constrained” is not appropriate. (page 25 Final Decision and Order.)

Therefore, through the KCRP VI v. Kitsap County’s decision, the CPSGMHB has validated the 2005 ULCA methodology with the exception of the sewer constrained lands reduction factor.

#### Kitsap County 2006 Comprehensive Plan

The County’s 2006 Comprehensive Plan’s Section 2.2.2 “Land Capacity Analysis” in the Plan’s Land Use chapter, includes Policy LU 6: “Use the Updated Land Capacity Analysis methods to identify capacity for urban residential and urban commercial/industrial lands.” The County’s 2006 Plan utilized the 2005 UCLA methodology with the exception of sewer constrained lands reduction factor, when enlarging certain urban growth areas in the 2006 Plan.

#### Kitsap County 2007 Buildable Lands Report

In August 2007, Kitsap County released its Buildable Lands Report (BLR). This report is in response to RCW 26.70A.215 Buildable Lands requirement of five year reporting. This report evaluated the growth and densities achieved in Kitsap County and its cities from 2000–2005.

The BLR is divided into five parts: 1) Population growth permitted housing units in Kitsap County’s unincorporated lands (urban growth areas and rural), and within each of the cities’ limits are reported; 2) Data collection and land capacity analysis methodology are outlined. It is clearly stated that the methodology utilized for the report is the 2005 Updated Land Capacity Analysis methodology, with the removal of the “sewer constrained lands” reduction factor; 3) Population and Housing Analysis by Jurisdiction, where the density growth from 2000–2005 is set forth. A buildable land capacity is also included; 4) Commercial and industrial land analysis; and 5) Reasonable Measures evaluation.

The 2007 BLR also identifies in its Appendix A, the ULCA methodology and variables utilized by each of the County's four cities. The City of Poulsbo has identified two variable refinements from the ULCA methodology: 1) continue to use the critical area reduction factor from the Poulsbo Subarea Plan, and 2) utilize a 2.45 average household size (hhs). The remaining methodology and variables as set forth in the ULCA are to be applied to the city limits and Poulsbo urban growth area.

The Kitsap County Board of Commissioners adopted the 2007 BLR in spring 2008; the report was not appealed.

#### **Poulsbo 2009 Comprehensive Plan Update**

Kitsap County Department of Community Development completed the land capacity analysis for Poulsbo's comprehensive plan update. The County completed three analyses for Poulsbo— all utilizing the adopted ULCA methodology, variable critical area reduction factor, and 2.45 hhs.

#### **Analysis of new CAO impact on land availability**

The City adopted a new Critical Areas Ordinance in 2007; among the many new provisions and requirements of the new CAO, increased vegetative buffer requirements for regulated streams and wetlands were established. The increased buffer widths result in decreasing the amount of available land for future development previously assumed in the Poulsbo Subarea Plan's land capacity analysis.

A new critical area reduction factor was determined by performing an analysis through the City's Geographic Information System (GIS). The GIS analysis captured all mapped critical areas and applied the highest and most likely buffer that would be required by the new City CAO on all vacant and underutilized parcels in the city limits and urban growth area. A comparison between the available vacant and underutilized parcels and the critical area and buffer map was made in GIS to determine the overall impact on the available land as a percentage. The result is that 26.5% of the available vacant and underutilized land in the city limits and urban growth area are encumbered by critical areas and vegetated buffer requirements.

#### **2008 2014 Poulsbo Land Capacity Analysis**

Kitsap County Community Development Geographic Information Systems (GIS) division performed the land capacity analysis for both the Poulsbo city limits and the unincorporated urban growth area in November 2008. The methodology utilized is the adopted 2005 Updated Land Capacity Analysis methodology (without sewer constrained reduction) with the two variable refinements specific to Poulsbo (household size and critical area reduction factor). **GMA requires as a component of the Buildable Lands Reporting, a determination there is sufficient suitable land to accommodate the countywide population projection. For the 2014 Kitsap Buildable Lands Report, a land capacity analysis of each of the city limits and unincorporated urban growth area was completed. Poulsbo's land capacity analysis evaluated whether sufficient land remained available to accommodate is 2036 population allocation of 14,808.**

The completed Poulsbo 2008 **2014 Kitsap Buildable Lands Report** Updated Land Capacity Analysis tables are included in Appendix C-2.

Poulsbo requested three analyses be completed—one utilizing the critical area reduction factor of 22% (as adopted in the Poulsbo Subarea Plan and 2007 BLR); the second utilizing a critical area reduction factor of 26.5% which reflects the impact of the increased vegetative buffer requirements on available land due to the City's new CAO; and the third utilizing Kitsap County's ULCA methodology critical area reduction factor.

- The Land Capacity Analysis utilizing the 22% critical area reduction factor concludes that the current city limits can accommodate 4,341 additional persons and the current urban growth area can accommodate 987 additional persons, for a combined total of 5,328 population capacity.

**Table 13-5 2 2014 Poulsbo Land Capacity Analysis City Limits with 22% critical area reduction factor**

<b>Poulsbo City Limits</b>				
	<u>Residential Low (5 Du/Ac)</u>	<u>Residential Medium (10 Du/Ac)</u>	<u>Residential High (14 Du/Ac)</u>	<u>Total</u>
	<u>Acres</u>	<u>Acres</u>	<u>Acres</u>	<u>Acres</u>
<u>Net Developable Acres</u>	<u>272.888</u>	<u>53.579</u>	<u>37.17696039</u>	<u>363.644</u>
<u>Dwelling Unit Capacity</u>	<u>5 du/ac</u>	<u>10 du/ac</u>	<u>14 du/ac</u>	<u>DUs</u>
	<u>1292.442</u>	<u>525.789</u>	<u>510</u>	<u>2328.231</u>
<u>Population Capacity</u>	<u>2.3 PPH</u>	<u>2.3 PPH</u>	<u>2.3 PPH</u>	<u>Total Population</u>
	<u>2972.617</u>	<u>1209.316</u>	<u>1174</u>	<u>5355.93</u>

*Source: City of Poulsbo Planning and Economic Development Department*

**Table 13-6 3 2014 Poulsbo Land Capacity Urban Growth Area**

<b>Poulsbo Urban Growth Area</b>		
	<b>Residential Low (5 du/Ac)</b>	<b>Total</b>
	<u>Acres</u>	-
<b>Net Developable Acres</b>	<b>119.157</b>	<b>119.157</b>
	<u>5 du/ac</u>	-
<b>Dwelling Unit Capacity</b>	<b>539.785</b>	<b>539.785</b>
	<u>2.3 PPH</u>	-
<b>Population Capacity</b>	<b>1241.506</b>	<b>1241.506</b>

*Source: City of Poulsbo Planning and Economic Development Department*

	<b>RL minimum 4 du/acre</b>	<b>RM minimum 5 du/acre</b>	<b>RH minimum 10 du/acre</b>	<b>Redevelopment Zone (Poulsbo Place)</b>
Net Developable Acres - City	268.4	57.12	39.18	
Net Developable Acres - UGA	118.73	0	0	
Total Net Developable Acres	387.13	57.12	39.18	
Dwelling Unit Capacity	1548.52	285.60	391.80	137
Decreased by existing units	163	10	15	
Total Dwelling Unit Capacity	1385.52	275.60	376.80	137
Total Population @ 2.45 pph	3394.52	675.22	923.16	336
<b>Total Population Capacity</b>				<b>5,328</b>

*Source: Poulsbo 2008 Land Capacity Analysis Table 22% critical area reduction factor*

- The Land Capacity Analysis utilizing the 26.5% critical area reduction factor concludes that the current city limits can accommodate 4,094 additional persons and the current urban growth area can accommodate 920 additional persons, for a combined total of 5,014 population capacity.

**Table 13-3 Land Capacity Analysis with 26.5% critical area reduction factor**

	<b>RL minimum 4 du/acre</b>	<b>RM minimum 5 du/acre</b>	<b>RH minimum 10 du/acre</b>	<b>Redevelopment Zone (Poulsbo Place)</b>
Net Developable Acres - City	252.91	53.82	36.93	
Net Developable Acres - UGA	111.88	0	0	
Total Net Developable Acres	364.79	53.82	36.93	
Dwelling Unit Capacity	1459.16	269.10	369.3	137
Decreased by existing units	163	10	15	

Total Dwelling Unit Capacity	1296.16	259.10	354.3	137
Total Population @ 2.45 pph	3175.59	634.8	868.03	336
<b>Total Population Capacity</b>				<b>5,014</b>

Source: Poulsbo 2008 Land Capacity Analysis Table 26.5% critical area reduction factor

- The Land Capacity Analysis utilizing the ULCA critical area reduction factor concludes that the current city limits can accommodate 4,353 additional persons and the current urban growth area can accommodate 973 additional persons, for a combined total of 5,326 population capacity.

**Table 13-4 Land Capacity Analysis with Kitsap County's ULCA critical area reduction factor**

	<b>RL minimum 4 du/acre</b>	<b>RM minimum 5 du/acre</b>	<b>RH minimum 10 du/acre</b>	<b>Redevelopment Zone (Poulsbo Place)</b>
Net Developable Acres - City	290.18	63.22	27.9	
Net Developable Acres - UGA	117.29	0	0	
Total Net Developable Acres	407.47	63.22	27.9	
Dwelling Unit Capacity	1629.88	316.1	279	137
Decreased by existing units	163	10	15	
Total Dwelling Unit Capacity	1466.88	306.1	264	137
Total Population @ 2.45 pph	3593.86	749.95	646.8	336
<b>Total Population Capacity</b>				<b>5,326</b>

Source: Poulsbo 2008 Land Capacity Analysis Table ULCA critical area reduction factor

By performing the land capacity analysis utilizing three legitimate critical area reduction factors—a population capacity range has been established for Poulsbo and its urban growth area. Comparing the three results, a couple of conclusions can be made:

- Comparing the 22% and 26.5% critical area reduction factors, the City's new critical area buffer requirements has displaced the available land capacity to accommodate 314 persons;
- Kitsap County's ULCA critical area reduction factor results in a population capacity that is practically the same as the Poulsbo Subarea Plan's 22% critical area reduction factor.

Therefore, based on the updated land capacity analyses performed for the city limits and urban growth area, the population capacity for Poulsbo ranges between 5,014 and 5,329 persons.

## ***Comparison of population capacity to 2025 2036 population allocation***

Poulsbo has been allocated through Appendix B-1 of the Kitsap Countywide Planning Policy, a total 2025 2036 population of 14,808. This population is for both the city limits and urban growth area. To determine the amount of new growth remaining, the 2009 2016 population in the city limits and urban growth area has been subtracted from the 14,808.

**Table 13-7 5 Poulsbo 2036 2009-2025 Projected New Growth**

<b>Population Distribution</b>	<b>2025 2036 Total Population</b>	<b>- 2016 2009 Population</b>	<b>= New persons expected by 2025</b>
Poulsbo City	10,552	<u>10,210</u> 8,855	<u>342</u> 1,697
Poulsbo UGA	4,256	<u>416</u> 438	<u>3,840</u> 3,818
<b>TOTAL</b>	<b>14,808</b>	<b><u>10,626</u> 9,293</b>	<b><u>4,182</u> 5,515</b>

Source: Appendix B-1 Population Distribution Through 2036 2005-2025 Kitsap Countywide Planning Policy; 2009 2015 OFM population estimate; and Kitsap Assessor Data for 2016 2009-Poulsbo UGA population.

### ***Comparison of net growth remaining to population capacity***

To determine whether the City and its urban growth area can accommodate its 2025 2036 population allocation, a comparison between the results of the land capacity analyses and the new growth remaining is made. Table 13-8 6 depicts this comparison:

**Table 13-8 6 Comparison of new growth remaining to population capacity**

<b>Poulsbo City Limits and UGA</b>	<b>Population Capacity and Demand</b>
<b>2036 Population Capacity City limits + urban growth area (Tables 13-5 and 13-6)</b>	<b><u>6,597</u></b>
<b>2036 Population Target (Table 13-7)</b>	<b><u>4,182</u></b>
<b>Net 20-year population capacity</b>	<b><u>2,415</u></b>

Source: City of Poulsbo Planning and Economic Development Department

Therefore, based on the updated 2014 Buildable Lands Report land capacity analyses methodology that calculates the available land's ability to accommodate future housing units - compared to the remaining net growth the City must accommodate - there appears

to be sufficient capacity within the city limits and urban growth area to accommodate the adopted population target. a range of anticipated new persons that cannot be accommodated. Looking at the most conservative estimate, this may result in a need for 205 additional dwelling units.

The population capacity for the city limits and urban growth area has increased since the 2007 Buildable Lands Report and the 2009 Comprehensive Plan updated land capacity analysis. This increase can be explained primarily by changes in the land capacity methodology; and particularly, the density assumptions per zoning district now utilizes the maximum density per zone when calculating population, whereas past land capacity methodology utilized the minimum density per zoning district. If minimum densities were utilized for the land capacity analysis, the population capacity would decrease by 1,100 persons. However, the 2014 BLR methodology utilized the maximum density per zoning district due to a remand order from the Central Puget Sound Growth Management Hearings Board, and Poulsbo's land use capacity utilized the same methodology. Additionally, while there is no way to guarantee that projects will develop at maximum density, the net densities approved residential development projects have achieved also supports utilizing the maximum density assumption.

Regardless of whether the minimum or maximum density per zoning district is utilized, it is clear that the existing available land within the city limits and urban growth area remains adequate for Poulsbo's 2036 14,808 population target.

Estimated growth to accommodate 5,515 new persons	Population Capacity Ranges		
	22% CA reduction	26.5% CA reduction	ULCA CA reduction
	5,328	5,014	5,326
	population capacity	population capacity	population capacity

Table 13-7 translates the remaining new persons from Table 13-6 into dwelling units (by 2.45 pph), in order to recognize the potential impact of the theoretical shortfall.

**Table 13-7 Additional dwelling units to accommodate new persons**

Population Capacity Ranges		
22% CA reduction	26.5% CA reduction	ULCA CA reduction
187 person shortfall	501 person shortfall	189 person shortfall
<b>76 dwelling units</b>	<b>205 dwelling units</b>	<b>77 dwelling units</b>

## ***Accommodating Poulsbo's population allocation***

The 2008 2014 Poulsbo Land Capacity Analysis completed by Kitsap County demonstrates that Poulsbo has sufficient capacity within its city limits and urban growth area to accommodate its 2025 2036 population allocation of 14,808.

~~The potential dwelling unit shortfall identified Table 13-7 can be easily accommodated through many of the infill and density maximization techniques identified in the 2009 Comprehensive Plan and which will be implemented through development regulations.~~

**Additionally, the City has adopted in its zoning ordinance** These density maximization techniques **that should result in efficient land use,** will likely afford higher number of units than the minimum density assumed in the land capacity analyses. Other **Reduction factors assumptions applied in the land capacity methodology,** such as critical areas, roads, and public facilities may not be as high as assumed in the 2014 BLR land capacity analysis; and lands not even considered in the land capacity analysis (i.e. current use exempt land), may exit out of the program and be available for development. Many factors are unknown - this land capacity analysis is a temporary snapshot.

~~The City has many years left in its 2025 planning period.~~ The City must maintain thorough monitoring of its approved **residential project** densities, final plats and certificates of occupancy. Appropriate annual monitoring by the City Planning Department will ensure the City's population capacity remains on course.

- The City shall build on the data bases created in conjunction with the development of this comprehensive plan, and keep them current.
- The City shall review annually:
  - Net growth adjusted each year by new population estimate by OFM;
  - Residential project densities approved to determine trends; and
  - Identify if any significant variation from density assumptions has occurred.

Further, the GMA has built into its requirements certain check-ins over time to ensure that implementation of comprehensive plans is consistent with the requirements of growth management. There are three identified check-in points: 1) the seven five-year Buildable Lands Reporting; 2) the eight seven-year comprehensive plan review and update if necessary; and 3) the ten-year urban growth area review **in conjunction with the comprehensive plan review** and update if necessary.

Of these, the five-year Buildable Lands Reporting (BLR) provides the City critical evaluation of its density trends and updates its land and population capacity at each interval. The BLR is completed in coordination with Kitsap County, ensuring the Kitsap Countywide Planning Policies on BLR are implemented.

Further, the Central Puget Sound Growth Management Hearings Board has stated:

*There is a sound and logical link between the BLR's assessment of past activities and the land capacity analysis' evaluation of accommodating future growth. The information derived from the BLR should provide data better than theoretical densities and serve as a basis for modifying planning assumptions, policies and designations and testing them with a future land capacity analysis to determine whether jurisdictions have planned for the capacity to accommodate newly assigned growth. [Pilchuck VI, 06315c, FDO, at 17.]*

Therefore, the City will continue to coordinate with Kitsap County in its ~~five year~~ Buildable Lands Reporting. The City shall utilize the data collected and analyzed to monitor and scrutinize development trends to ensure adequate densities are being achieved to accommodate the City's population allocation. The City should also discuss with Kitsap County if land capacity methodology assumptions for Poulsbo should be refined based on the BLR evaluation results.

#### **Reasonable measures**

The GMA requires that a jurisdiction consider reasonable measures before enlarging an urban growth area to accommodate population growth. The City will begin implementing reasonable measures to increase its population capacity. Section 13.4 completes a reasonable measure evaluation.

#### **Conclusion**

The City has an adopted Subarea Plan that established an appropriately sized urban growth area using the adopted land capacity analysis methodology at that time. A review of all residential projects approved since 2002 concludes that urban densities have been achieved, resulting in an overall city average of 7 du/net acre.

A new land capacity analysis was completed for the City's 2009 Comprehensive Plan update. The analysis has identified a range of population capacity. This updated land capacity analysis completed by Kitsap County, demonstrates that Poulsbo has sufficient capacity within its city limits and urban growth area to accommodate its 2025 population allocation of 14,808.

The City still has many years left in its 2025 planning period. Poulsbo has provided in the 2009 Comprehensive Plan a variety of infill and density maximization policies and techniques that are available for future developments. Over the course of the 2025 planning period, accommodation of the potential dwelling unit shortfall may be easily made through implementation of these tools and techniques.

The City needs to continue monitoring. Appropriate annual monitoring by the City Planning Department as well as the five year Buildable Lands Reporting will ensure the City's population capacity remains on course.

The City will also implement reasonable measures to increase its population capacity.

## **13.4 Reasonable Measures Evaluation**

The GMA requires that a jurisdiction must consider reasonable measures before enlarging an urban growth area to accommodate population growth: RCW 36.70A.215(1)(b) “Identify reasonable measures, other than adjusting urban growth areas, that will be taken to comply with the requirements of this chapter.”

Further, the Kitsap Countywide Planning Policies includes the following in its Urban Growth Area Policies:

“2. Each jurisdiction is responsible for implementing appropriate reasonable measures within its jurisdictional boundaries. If the Buildable Lands Analysis shows that a jurisdiction’s Comprehensive Plan growth goals are not being met, that jurisdiction shall consider implementing additional reasonable measures in order to use its designated urban land more efficiently.”

To assist in the identification of appropriate reasonable measures, in 2005 the Kitsap Regional Coordinating Council ~~has~~ prepared a list of numerous reasonable measures to encourage urban densities and increase residential development capacity in existing urban growth areas for jurisdictions to consider during their comprehensive plan updates.

### ***KRCC's List of Reasonable Measures***

The following reasonable measures ~~are~~ were included identified in the 2005 KRCC's list to maximize density:

- Increase building height to allow for higher densities
- Allow accessory dwelling units
- Clustering
- Duplexes, town homes, and condominiums
- Density bonuses
- Higher allowable densities
- Minimum density requirements
- Mixed use
- Small lot/Cottage housing
- Transit-oriented development
- Urban centers and Urban villages
- Lot size averaging
- Allow co-housing
- Encourage infill and redevelopment
- Mandate maximum lot sizes
- Enact inclusionary zoning ordinance for new housing developments
- Zone areas by performance, not by use

Many of these identified reasonable measures are currently implemented and codified in the Poulsbo Zoning Ordinance (such as accessory dwelling units, clustering, attached housing units, mixed use, small lot/cottage housing, and infill and redevelopment). Of those reasonable measures either not currently implemented or not fully implemented, the following may be applicable to Poulsbo's need to increase capacity:

1. Increase building height to allow for higher densities
2. Duplexes, town homes, and condominiums
3. Density Bonuses
4. Higher Allowable Densities
5. Urban Centers and Urban Villages
6. Lot Size Averaging
7. **Infill and Redevelopment**

### **Poulsbo's Reasonable Measures Evaluation**

#### **1. *Increase building height to allow for higher densities***

Currently, Poulsbo's height limit is 35' (from average finish grade to peak of roof) for all zoning districts. Practically, this limits the height of structures to no more than three-stories. An increase of height in the multi-family zones (RM and RH) would allow for higher densities to be achieved in the same footprint as currently allowed. Further, allowing an increase in height in the Commercial zone when mixed use is proposed – when residential units are to be located above the street/first floor – could also help maximize residential unit capacity.

#### **2. *Duplexes, town homes, and condominiums***

Duplexes, town homes and condominiums, as well other types of attached developments, are all appropriate for the City's RM and RH zoning districts. In 2007 and 2013, the City amended its zoning development regulations for the RM and RH zones to facilitate increased efficiency in these zones. The new standards identify duplexes, triplexes, apartments, town homes, detached cottage and attached or detached condominiums as permitted, and provide standards to encourage development of these types of housing units over the traditional single-family detached subdivision. The City should monitor how these amendments are implemented and if the desired results occur.

#### **3. *Density Bonuses***

Density bonuses are currently provided for in Poulsbo's Planned Residential Development provisions. These density bonuses are tied to specific public benefit provision and therefore, may not be widely utilized by developers. ~~The City amended these provisions in 2007 and none of the PRD applications submitted since then have proposed utilizing the density bonus provision. However, there has not been enough implementation time to identify a trend.~~ Monitoring of the use of density bonuses should be made to evaluate whether the public benefit requirement for density bonuses should be refined.

**4. *Higher Allowable Densities***

Of all the proposed reasonable measures, this measure is the most quantifiable. Since Poulsbo has minimum density requirements, increasing the City's minimum densities even by one dwelling unit in each of the three residential zones, would provide for additional residential unit and population capacity. Increasing densities not only is more quantifiable, it also provides the highest level of predictability. It is possible, of course, for residential projects to develop to the maximum density allowed per zoning district or utilize the density bonus provision of the planned residential development – but this is less predictable as it is largely dependent on economic market factors and developer preferences.

**5. *Urban Centers and Urban Villages***

Urban Centers or Urban Villages can provide creative mixing of uses and residential densities, while facilitating walkability and inter-connected neighborhoods. Poulsbo has two centers designated by the KRCC – College MarketPlace and Town Center. The City is planning to initiate a Viking Avenue Mixed Use Corridor Plan and Town Center Neighborhood Plan to define its planning boundary, identify mixed use, commercial uses, residential density opportunities, and enhance neighborhood connectivity and pedestrian amenities. This plan will likely result in recommendations to increase and enhance mixed use developments, identify methods to provide a variety of housing types and densities, design guidelines, and streetscape amenities.

**6. *Lot Size Averaging***

Poulsbo does not currently provide for lot size averaging. For residential development projects not utilizing the City's PRD provisions, a lot size averaging provision could help maximize the development's ability to reach maximize zoned density. While not exceeding the underlying maximum zoned density, a project may be able to utilize a variety of lot sizes to achieve the zoned density, where otherwise constraints such as critical areas, storm water management facilities and roads may result in a lower overall density. The 2013 zoning code update included provisions for lot size averaging in the RL zoning district. The City should monitor how these amendments are implemented and if the desired results occur.

**7. *Encourage infill and redevelopment***

The 2013 zoning code update introduced additional flexibility to achieve density. New zoning provisions included expanded sections on infill residential development in residential zoning districts, and incentives in for residential units within commercial zoning districts. The City should monitor how these amendments are implemented and if the desired results occur.

## ***2009 Reasonable Measure Implementation***

The following reasonable measures shall be implemented after the adoption of the 2009 Comprehensive Plan update, and monitored to ensure their successful execution.

1. ***Initiate Viking Avenue Mixed Use Corridor Plan and Town Center Neighborhood.*** The City shall consider initiating a Viking Avenue Mixed Use Corridor Plan and Town Center Neighborhood Plan, which would define a planning area boundary (that could serve as an overlay zone), identify mixed use opportunities, enhance neighborhood connectivity and pedestrian amenities, identify housing types and densities, and streetscape amenities.
2. ***Include Lot Size Averaging provisions*** in the City's development regulations to provide opportunity for density maximization in the RL zoning district. Amendments to the Poulsbo zoning ordinance are necessary to implement this reasonable measure.
3. ***Monitor recently amended density bonus provision and RM/RH development standards*** to ensure these amendments are implemented, if these techniques provide density maximization, or if refinements are necessary to ensure desired results.

## ***Future Reasonable Measure Implementation***

Additional population allocations to Poulsbo will be distributed by the KRCC in the future; this is the nature of growth management planning - it is ongoing and continuous. The City will need to evaluate and implement additional reasonable measures in the future to increase population capacity for any new population distribution made by the KRCC. A full palette of reasonable measures options will be evaluated, with additional reasonable measures identified either from the KRCC List or from other appropriate planning resources.

## ***Conclusion***

The City will begin implementing reasonable measures. For this 2009 Comprehensive Plan Update, the City will initiate a Viking Avenue Mixed Use Corridor Plan and Town Center Neighborhood Plan, where one component of the Plans would identify residential density opportunities. Additionally, the City has included a policy in its land use chapter to include lot size averaging provisions within its development regulations. Monitoring of the current density bonus provisions should be made to determine whether refinements to the 2007 amendments may be necessary; and the same should be made for the amendments made in the RM and RH zoning districts to ensure desired results occur.

Additional reasonable measures may be identified, either from the KRCC Menu or from other appropriate planning resources, at such a time when the City must begin additional reasonable measures implementation, most likely at such a time when Poulsbo receives a new population allocation from the KRCC.