



STATE OF WASHINGTON

DEPARTMENT OF COMMERCE

1011 Plum Street SE • PO Box 42525 • Olympia, Washington 98504-2525 • (360) 725-4000
www.commerce.wa.gov

February 22, 2024

Planning Commission
City of Poulsbo
c/o Nikole Coleman
Senior Planner

Sent Via Electronic Mail: ncoleman@cityofpoulsbo.com

Re: Review of Proposed Amendments to the Poulsbo Municipal Code (PMC)

Dear Commission Members:

Thank for the opportunity comment on proposed amendments to Poulsbo Municipal Code (PMC) 18.70.070 and 18.80.080, which relate to supportive housing types in residential and commercial zones respectively. Growth Management Services received the proposed amendments on January 4, 2024, and processed them with material identification number 2024-S-6782.

In 2021, the legislature adopted ESSHB 1220, changing how local governments in Washington plan for housing. The bill, partially codified in RCW 35.21.683, supports transitional housing, permanent supportive housing, as well as emergency housing and shelters through development of comprehensive plans and development regulations. ESSHB 1220 became effective July 25, 2021, with the exception of Sections 3 and 4 which became effective September 30, 2021.

We appreciate the City of Poulsbo's efforts to implement ESSHB 1220 and, based on our review of the proposed amendments, offer our comments and suggestions below:

1. As proposed in both residential and commercial zones, spacing is required between permanent supportive housing, transitional housing and emergency housing. In combination with this spacing requirement, the draft code limits occupancy of indoor emergency shelters to no more than ten families or 40 people, and it caps the density of permanent supportive and transitional housing at the surrounding zoning densities. According to the City of Poulsbo's "[Planning for Housing](#)" document updated December 2023, the housing needs allocation chart indicates Poulsbo needs to accommodate 166 permanent supportive housing units and 83 shelter beds over the next 20 years. As written, this draft amendment may not allow a sufficient number of supportive housing units to meet the allocated need for 20-year growth.

Per [RCW 35.21.683](#), “reasonable occupancy, spacing, and intensity of use requirements may be imposed by ordinance on permanent supportive housing, transitional housing, indoor emergency housing, and indoor emergency shelters to protect public health and safety. Any such requirements on occupancy, spacing, and intensity of use may not prevent the siting of a sufficient number of permanent supportive housing, transitional housing, indoor emergency housing, or indoor emergency shelters necessary to accommodate each city's projected need for such housing and shelter under RCW 36.70A.070(2)(a)(ii)”.

If the spacing requirement is retained, then we recommend that a staff report be prepared which includes:

- a. An explanation of how the requirements are connected to the protection of public health and safety.
 - b. Demonstration of available land capacity for development of a sufficient number of these housing types to meet projected needs.
2. We are also concerned that permanent supportive housing is perceived to have the same types of impacts as emergency shelters. We have heard from many cities that permanent supportive housing, when well-managed, does not have negative impacts in the neighborhoods in which it is sited. However, the bigger issue is that, with the combination of spacing requirements and occupancy restrictions included in this draft, Poulsbo may not be able to accommodate the number of such housing units allocated to the city. We recommend that spacing is not required and that the city rely on licensor requirements to maintain public health and safety while allowing the operation of supported housing types.

[RCW 35.21.683](#) expressly states requirements on occupancy, spacing, and intensity of use may not prevent the siting of a sufficient number of permanent supportive housing, transitional housing, indoor emergency housing, or indoor emergency shelters necessary to accommodate each city’s projected need for such housing and shelter under RCW 36.70A.070(2)(a)(ii).

3. We appreciate Poulsbo’s proposed amendments to regulations for accessory dwelling units (ADUs) as well as proposed amendments to exempt ADUs from impact fees. The addition of ADUs can help increase the variety of housing types in a community and offer the opportunity for more attainable housing. The proposed amendments to PMC 18.70.070, in large, appear consistent with the requirements of House Bill 1337. With that, the draft appears to be missing an allowance for zero setback at a rear lot line that abuts a public access alleyway, which is a required component of HB 1337. If new lots are platted with public access alleyways, zero setbacks at rear lot lines must be allowed.

As a friendly reminder, copies of adopted plans must be submitted to Commerce within ten days after final adoption ([RCW 36.70A.106\(2\)](#)).

We understand a workshop with Council was scheduled for February 21, 2024, and the intended date of adoption is March 6, 2024. To that end, we are available for technical assistance and, if requested, can attend meetings. Thank you again for the opportunity to comment. If you have any questions, please feel free to contact me at (360)725-2706 or Carol.Holman@commerce.wa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Carol Holman". The signature is written in a cursive, flowing style.

Carol Holman
Western Washington Regional Manager
Growth Management Services

cc:

David Andersen, AICP, Senior Managing Director, Growth Management Services
Valerie Smith, AICP, Deputy Managing Director, Growth Management Services
Ben Serr, AICP, Eastern Washington Regional Manager, Growth Management Services
Anne Fritzel, AICP, Housing Programs Manager, Growth Management Services
Virginia MacDonald, Housing Planner, Growth Management Services

Dear Councilmembers

December 27, 2023

I am would like to propose a thoughtful amendment to the current zoning regulations in Poulsbo, with the aim of addressing emerging needs and fostering sustainable growth within our community.

Objective:

The proposed amendment seeks to strike a balance between preserving the unique character of Poulsbo and accommodating the evolving requirements of our residents. This initiative aims to enhance the city's livability, promote economic vitality, and ensure a harmonious coexistence between residential spaces.

I have a detached garage about 450 sq. that was built in 1921. Recently I have learned that I could convert the structure to an ADU unit. To replace the garage and build a two-bedroom apartment, 800 to 1000 sq. foot, there needs to be an expansion horizontally and or vertically. Ideally, I could build a two-story building replacing current structure with minimal expansion. I have an old growth Beech Tree behind the garage which limits me to some extent for expansion horizontally, I do not want to harm the tree. I would appreciate a closer look at the underlying zone requirements regarding the setback, allowing us to get a permit to replace an old existing structure with a new safe building with fire code for a livable space that complies with the city standard.

Key Recommendations:

- *Issue a city or county remodeling Permit for the conversion of existing structure and ease on certain development standards and requirements, especially setbacks where it is practical and does not affect the natural areas. This will encourage the development of vibrant neighborhoods.*
- *The Ease on certain regulation such as setbacks would be an incentive for developers to build a habitable and affordable housing units in their projects, addressing the pressing need for diverse housing options in Poulsbo.*
- *By incentivizing diverse housing options, you can address the housing affordability challenge and accommodate the needs of residents at various income levels and contribute to a higher quality of life for Poulsbo's residents.*

Next Steps:

I propose that the councilmembers to review and refine these recommendations, considering input from various homeowners and city engineers.

I look forward to the opportunity to discuss these proposed changes further and collaborate on making Poulsbo an even more vibrant and resilient community.

Sincerely,

Manochehr Nourizadeh

mano.nouri@gmail.com, (206-780-8558)

Dear Councilmembers,

I just wanted to thank wholeheartedly the Planning Commission for the recommendation to move forward with the zoning code amendments (ADU's). I and a couple of our neighbors are excited that the City Council going ahead with the agenda for consent. We think the new simplified version of the Zoning Code and permits will help us a lot moving forward for renovation and construction without losing the footprint. It really means a lot to us to be able to update and rebuild the old structures and being able to add an ADU unit if it is feasible to do it.

We are proud of our city officials (Planning and Economic Development staff, Commissioners and Councilmembers) for the work that is being done. We want to keep our City a beautiful place to live in and you are a big part of that.

Sincerely,

February 21, 2024

Manochehr Nourizadeh

From: [Charles Thrasher](#)
To: [City of Poulsbo Planning and Economic Development](#)
Subject: Re: 2023 Zoning Code Amendments - City Council Public Hearing - March 6th
Date: Tuesday, February 20, 2024 5:02:34 PM

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

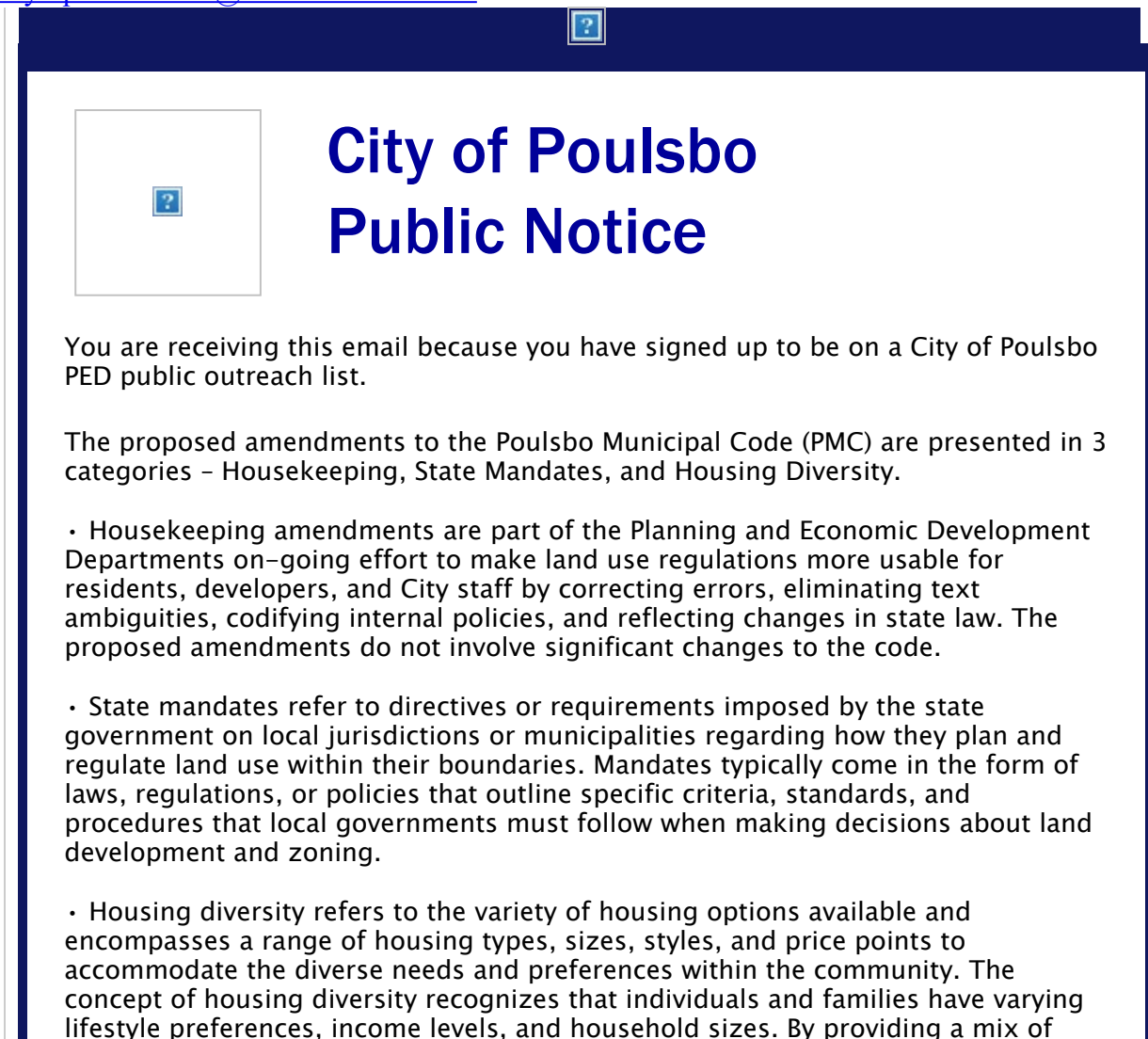
C-1 Downtown limited zoning amendment.

My question

What is commercial parking ratio ?
Will the residential units have off street parking?

Thank you
Charles Thrasher

On Tue, Feb 20, 2024, 11:05 AM City of Poulsbo PED Department <planninginfo-cityofpoulsbo.com@shared1.ccsend.com> wrote:



The graphic is a public notice from the City of Poulsbo. It features a dark blue header with a white question mark icon. Below the header is a white box with a blue question mark icon on the left and the text "City of Poulsbo Public Notice" in large blue font. The main body of the notice is white with a dark blue border. It contains three paragraphs of text and a bulleted list of three items. The first paragraph explains why the recipient is receiving the email. The second paragraph introduces the proposed amendments to the Municipal Code (PMC). The third paragraph is a bulleted list detailing the types of amendments: Housekeeping, State Mandates, and Housing Diversity.

**City of Poulsbo
Public Notice**

You are receiving this email because you have signed up to be on a City of Poulsbo PED public outreach list.

The proposed amendments to the Poulsbo Municipal Code (PMC) are presented in 3 categories – Housekeeping, State Mandates, and Housing Diversity.

- Housekeeping amendments are part of the Planning and Economic Development Departments on-going effort to make land use regulations more usable for residents, developers, and City staff by correcting errors, eliminating text ambiguities, codifying internal policies, and reflecting changes in state law. The proposed amendments do not involve significant changes to the code.
- State mandates refer to directives or requirements imposed by the state government on local jurisdictions or municipalities regarding how they plan and regulate land use within their boundaries. Mandates typically come in the form of laws, regulations, or policies that outline specific criteria, standards, and procedures that local governments must follow when making decisions about land development and zoning.
- Housing diversity refers to the variety of housing options available and encompasses a range of housing types, sizes, styles, and price points to accommodate the diverse needs and preferences within the community. The concept of housing diversity recognizes that individuals and families have varying lifestyle preferences, income levels, and household sizes. By providing a mix of

From: [Charles Thrasher](#)
To: [Nikole CH. Coleman](#)
Subject: Building height change
Date: Thursday, February 22, 2024 3:51:19 PM

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Nikole,

Thank you for the clarification on 3rd Ave, C-1 building height.

But I believe you are increasing the build heights and these buildings can be designed with roof access in the existing 25 ft. limit.

Thank You Charles Thrasher

Sent from [Mail](#) for Windows