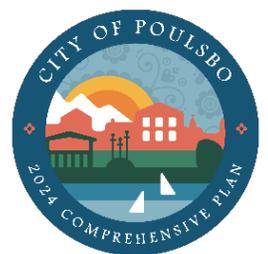


City of Poulsbo 2024 Comprehensive Plan Update

Final EIS



April 11, 2025



City of Poulsbo 2024 Comprehensive Plan Update

Final

Environmental Impact Statement

April 11, 2025

Prepared by:

City of Poulsbo Staff

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Cover Letter

April 11, 2025

Subject: Final Environmental Impact Statement (FEIS or Final EIS) for the City of Poulsbo 2024 Comprehensive Plan Update

Dear Reader:

The City of Poulsbo is updating its Comprehensive Plan consistent with the Growth Management Act (GMA; RCW 36.70A). The plan is designed to help the City meet its long-term vision for land use and growth management in incorporated city limits and associated unincorporated urban growth area.

In accordance with GMA, the 2024 Update addresses a 2044 horizon year, and considers new population, housing and job targets, changes to the future Land Use map, a fair share of affordable housing, housing policy amendments to address racially disparate impacts, and supporting investments in parks and multimodal/active transportation, utilities, and public services. The comprehensive plan is also required to be consistent with the Kitsap Countywide Planning Policies (CPPs), and with regional plans such as the Puget Sound Regional Council's (PSRC's) Vision 2050 which contains the Multi-County Planning Policies (MPPs).

This Draft EIS studies four land use and growth alternatives that included one no action and three action alternatives:

- Alternative 1** No Action, Current Adopted Plan
- Alternative 2** Adopted Plan + Missing Middle Housing Emphasis
- Alternative 3** Growth focused within SR 305 Corridor Center
- Alternative 4** Growth focused within SR 305 Corridor Center + Increase to density in Residential Medium and Residential High zoning districts

Agencies affected tribes and members of the public had an opportunity to comment on the Poulsbo 2044 Comprehensive Plan DEIS between January 18, 2025 through February 18, 2025. The City of Poulsbo received 6 letters or emails, with a total of 50 separate comments during this period. This FEIS contains a response to comments as well as additional information to address questions and comments where appropriate and possible.

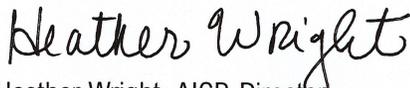
The Poulsbo City Council and Planning Commission evaluated the alternatives, staff recommendation, public comments received during the comment period and met on March 11, 2025. After discussion and deliberation, the Poulsbo City Council and Planning Commission chose Alternative 4 as the Preferred Alternative at their meeting.

The Final EIS provides responses to comments, as well as any needed clarifications or corrections from the DEIS. Code amendment proposals necessary to implement the Preferred Alternative are also included. The Final EIS does not repeat the information in the Draft EIS.

If you have questions, please contact: Nikole Coleman, Planning Manager, City of Poulsbo, 360.394.9748 or ncoleman@cityofpoulsbo.com. For more information, please see the project website: <https://cityofpoulsbo.com/planning-economic-development/2024compplanupdate/>.

Thank you for your interest in the future of Poulsbo.

Sincerely,



Heather Wright, AICP, Director

City of Poulsbo Planning and Economic Development, SEPA Responsible Official

Fact Sheet

Project Title

City of Poulsbo 2024-2044 Comprehensive Plan Update.

Proposed Action and Alternatives

The City of Poulsbo is updating the Poulsbo Growth Management Act Comprehensive Plan (“the comprehensive plan”) consistent with the Growth Management Act (GMA; [RCW 36.70A](#)). The comprehensive plan is designed to help the City meet its long-term vision for land use and growth management. The comprehensive plan:

- allocates population, and employment growth to various areas of the county, with a majority of growth occurring in Urban Growth Areas (UGAs);
- reduces sprawl in rural areas and maintains rural character;
- addresses housing needs of all economic segments of the population;
- supports economic development;
- conserves agricultural, forest, and mineral lands of long-term commercial significance;
- protects open space, cultural, and scenic resources;
- provides for parks, recreation, and capital facilities and utilities; and
- develops a transportation network necessary to serve the population and employment.

In accordance with GMA, the 2024 Update addresses and 2044 horizon year, and considers new population, housing and job targets, changes to the future Land Use map, a fair share of affordable housing, housing policy amendments to address racially disparate impacts, and supporting investments in multimodal/active transportation, utilities, public services and facilities, and parks. The comprehensive plan is also required to be consistent with the Kitsap Countywide Planning Policies (CPPs), and with regional plans such as the Puget Sound Regional Council’s (PSRC’s) Vision 2050 which contains the Multi-County Planning Policies (MPPs).

Four alternatives were examined in a Draft Environmental Impact Statement (Draft EIS) in January 2025:

- 1) **Alternative 1 – No Action, Current Adopted Plan:** This alternative assumes no changes to the future land use designations currently shown on the City’s Comprehensive Plan Land Use Map, and there will be no policy, zoning or regulation changes associated with this alternative. This alternative is required under SEPA.
- 2) **Alternative 2 – Adopted Plan + Missing Middle Housing Emphasis:** This strategy will focus on adding policies and development regulation amendments that would promote missing middle housing within the residential zoning districts. Examples of Missing Middle Housing that would be considered in zoning regulations are reduced minimum lot sizes; attached units (duplex, triplex, etc.) allowed in Residential Low zoning districts; infill; multiplex buildings; town or rowhouses; accessory dwelling units; and cottage/courtyard developments.
- 3) **Alternative 3 – Growth focused within SR 305 Corridor Center:** This alternative would evaluate the C-3 Commercial zone for opportunities to increase residential development along an existing transit corridor, while also maintaining a vital employment area. There are opportunities for development within this area and future code amendments may include increased building height, reduced parking requirements, and other incentives. A substantial portion of the population and new jobs will be assigned to this alternative. Residential designations and densities (Residential Low, Residential Medium and Residential High) remain the same as Alternative 1 Current Adopted Plan and includes Alternative 2 Missing Middle Emphasis.
- 4) **Alternative 4 – Growth focused within SR 305 Corridor Center and increase to density in Residential Medium and Residential High zoning districts:** This alternative would include the SR 305 Corridor Center evaluation and add increased densities to the City’s Residential Medium (RM) and Residential High (RH) zoning districts. RM density would increase from 6-10 units/acre to 6-14 units/acre; and RH would increase from 11-14 units/acre to 15-22 units/acre. Residential Low (4-5 unit/acre) remains the same as currently adopted.

The Poulsbo City Council and Planning Commission evaluated the alternatives, staff recommendation, public comments received during the comment period and met on March 11, 2025. After discussion and deliberation, the Poulsbo City Council and Planning Commission chose Alternative 4 as the Preferred Alternative at their meeting.

This FEIS responds to comments on the Draft EIS issued in January 2025 and completes the environmental review for the proposal.

Proponent and Lead Agency

City of Poulsbo Planning and Economic Development

Location

The proposal encompasses all incorporated City of Poulsbo and unincorporated areas associated with the Poulsbo Urban Growth Area. The City of Poulsbo is in the northern portion of Kitsap County.

Tentative Date of Implementation

Summer 2025

Responsible SEPA Official

Heather Wright, AICP, Director

City of Poulsbo Planning and Economic Development
200 NE Moe Street | Poulsbo, WA | 98370
360-394-9748 | hwright@cityofpoulsbo.com

Contact Person

Nikole Coleman, AICP, Planning Manager

City of Poulsbo Planning and Economic Development
200 NE Moe Street | Poulsbo, WA | 98370
360-394-9748 | ncoleman@cityofpoulsbo.com

Required Approvals

The proposal will be reviewed by the Poulsbo Planning Commission and considered for approval and adoption by the Poulsbo City Council. The proposal will be reviewed by the Washington State Department of Commerce for a 60-day period prior to City action. Puget Sound Regional Council will review the plan and certify the Transportation Element.

Principal EIS Authors and Contributors

The Final EIS has been prepared under the direction of the Poulsbo Planning and Economic Development Department.

Principal Authors:

Karla Boughton, Special Projects Planner
Nikole Coleman, AICP, Planning Manager
Tiffany Simmons, GIS

Consultants:

Parametrix - Transportation
Gary & Osborne - Water
BJC - Sanitary Sewer
Grette Associates – Environment
The Leland Group – Land Use

Contributors:

Heather Wright, AICP, Planning and Economic Development Director
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Josh Ranes, PE, City Engineer
Charlie Roberts, PE, Utilities Engineer
Rory Clark, Planning Intern

Draft EIS

Date of Issuance: January 17, 2025

Comment Period: January 17 to February 18, 2025

Final EIS

Date of Issuance: April 11, 2025

Date of Final Action

June 2025

Prior Environmental Review

Since 1995, the City of Poulsbo has issued the following series of environmental impact statements and supplements regarding the Poulsbo GMA Comprehensive Plans:

- City of Poulsbo 1994 Draft and Final Environmental Impact Statement
- City of Poulsbo 2009 Draft and Final Supplemental Environmental Impact Statement
- City of Poulsbo 2016 Determination of Non-Significance with Phased Review

Location of Background Data

You may review the project website for relevant reports and studies associate with the 2024 Comprehensive Plan Update at: <https://cityofpoulsbo.com/planning-economic-development/2024compplanupdate/>. Please see the contact person above if you desire clarifications or have questions.

Purchase/Availability of Final EIS

This FEIS is available for review at Poulsbo Planning and Economic Development, 2nd floor of the Poulsbo City Hall: 200 NE Moe Street, Poulsbo, WA 98370. The FEIS is posted on the City’s website: <https://cityofpoulsbo.com/planning-economic-development/2024compplanupdate/>. Thumb drives are available for purchase at cost at Poulsbo Planning and Economic Development Department.

Phased Review

Phased review of the proposal pursuant to WAC 197-11-060(5) is anticipated. Phased review assists agencies and the public to focus on issues that are ready for decision and exclude from consideration issues already decided or not yet ready. In phased review, broader environmental documents, such as the EIS for this proposal, may be followed by narrower documents that incorporate prior general discussion by reference and concentrate solely on the issues specific to that phase of the proposal.

Distribution List

Federal and Tribal Agencies

Suquamish Tribe
Port Gamble S’Klallam Tribe
U.S. Navy
U.S. Army Corps of Engineers

State and Regional Agencies

Department of Commerce
Department of Archaeology and Historic Preservation
Department of Ecology
Department of Fish and Wildlife
Department of Transportation
Puget Sound Clear Air Agency
Puget Sound Regional Council

Local and Regional Jurisdictions/Agencies

Kitsap County
City of Bainbridge Island
City of Bremerton
City of Port Orchard
Kitsap Transit
Kitsap Public Utilities District
Port of Poulsbo
Poulsbo Fire District
North Kitsap School District

Utilities

Puget Sound Energy
Cascade Natural Gas

Media

Kitsap Daily News
Kitsap Sun
Seattle Times

Community Organizations and Individuals

Community Organizations and Individuals maintained in the Comprehensive Plan Update email list.

Commenters

Commenters on the Draft EIS receive a notice of availability.

Chapter 1.0 | Introduction and Summary



1.1 Introduction

This section provides a summary of the City's proposals, alternatives, and environmental evaluation.

1.1.1 Overview of the Proposal

The City of Poulsbo is updating the Poulsbo Growth Management Act Comprehensive Plan ("the comprehensive plan") consistent with the Growth Management Act (GMA; [RCW 36.70A](#)). The comprehensive plan is designed to help the City meet its long-term vision for land use and growth management. The comprehensive plan:

- allocates population, and employment growth to various areas of the county, with a majority of growth occurring in Urban Growth Areas (UGAs);
- reduces sprawl in rural areas and maintains rural character;
- addresses housing needs of all economic segments of the population;
- supports economic development;
- protects open space, cultural, and scenic resources;
- provides for parks, recreation, and capital facilities and utilities; and
- develops a multimodal transportation network necessary to serve the population and employment.

In accordance with GMA, the 2024 Update addresses and 2044 horizon year, and considers new population, housing and job targets, changes to the future Land Use map, a fair share of affordable housing, housing policy amendments to address racially disparate impacts, and supporting investments in parks and multimodal/active transportation, utilities and public services. The comprehensive plan is also required to be consistent with the Kitsap Countywide Planning Policies (CPPs), and with regional plans such as the Puget Sound Regional Council's (PSRC's) Vision 2050 which contains the Multi-County Planning Policies (MPPs).

Four alternatives were examined in a Draft Environmental Impact Statement ([Draft EIS](#)) in January 2025:

- 1) **Alternative 1 – No Action, Current Adopted Plan:** This alternative assumes no changes to the future land use designations currently shown on the City's Comprehensive Plan Land Use Map, and there will be no policy, zoning or regulation changes associated with this alternative. This alternative is required under SEPA.
- 2) **Alternative 2 – Adopted Plan + Missing Middle Housing Emphasis:** This strategy will focus on adding policies and development regulation amendments that would promote missing middle housing within the residential zoning districts. Examples of Missing Middle Housing that would be considered in zoning regulations are reduced minimum lot sizes; attached units (duplex, triplex, etc.) allowed in Residential Low zoning districts; infill; multiplex buildings; town or rowhouses; accessory dwelling units; and cottage/courtyard developments.
- 3) **Alternative 3 – Growth focused within SR 305 Corridor Center:** This alternative would evaluate the C-3 Commercial zone for opportunities to increase residential development along an existing transit corridor, while also maintaining a vital employment area. There are opportunities for development within this area and future code amendments may include increased building height, reduced parking requirements, and other incentives. A substantial portion of the population and new jobs will be assigned to this alternative. Residential designations and densities (Residential Low, Residential Medium and Residential High) remains the same as Alternative 1 Current Adopted Plan and includes Alternative 2 Missing Middle Emphasis.
- 4) **Alternative 4 – Growth focused within SR 305 Corridor Center and increase to density in Residential Medium and Residential High zoning districts:** This alternative would include the SR 305 Corridor Center evaluation and add increased densities to the City's Residential Medium (RM) and Residential High (RH) zoning districts. RM density would increase from 6-10 units/acre to 6-14 units/acre; and RH would increase from 11-14 units/acre to 15-22 units/acre. Residential Low (4-5 unit/acre) remains the same as currently adopted.

The Poulsbo City Council and Planning Commission chose Alternative 4 as the Preferred Alternative at a March 11, 2025 meeting. The Final EIS provides responses to comments, as well as any needed clarifications or corrections from the Draft EIS. Code amendment proposals necessary to implement the Preferred Alternative are also included. The Final EIS does not repeat the information in the [Draft EIS](#).

1.1.2 Study Area

The primary study area includes all of the City of Poulsbo and associated unincorporated urban growth area Centrally located in North Kitsap County, Poulsbo is served by three state highways: SR 3, SR 307, and SR 305. Poulsbo's natural setting has highly recognizable characteristics that define the city as a unique and special place. Encompassing 5.36 square miles,

Poulsbo has numerous hills and valleys, streams, and frontage on the waters of Liberty Bay. Elevations range from sea level to 440 feet, with two ridges running along each side of Liberty Bay, which gradually rise in elevation and merge to the north. The western leg of the ridge slopes gradually towards Liberty Bay, while the eastern leg slopes in a broken pattern of knolls, valleys, and benches to the eastern shore of the Bay. Liberty Bay and the Liberty Bay Estuary are the two major bodies of water in Poulsbo. Relatively narrow and shallow, the bay serves as the receiving waters for Dogfish Creek, as well as a number of other streams at the edges of the city limits. Dogfish Creek is the largest stream system in Poulsbo and extends extensively outside of the city limits. The South Fork of Dogfish Creek is completely within the city limits, on the east side of Poulsbo, generally along the SR 305 corridor.

1.1.3 Land Acknowledgment

Every part of this soil is sacred in the estimation of my people. Every hillside, every valley, every plain and grove, has been hallowed by some sad or happy event in days long vanished.” - Chief Seattle 1854

We would like to begin by acknowledging that the land on which we gather is within the ancestral territory of the suq̓wabs̓ “People of Clear Salt Water” (Suquamish People). Expert fisherman, canoe builders and basket weavers, the suq̓wabs̓ live in harmony with the lands and waterways along Washington’s Central Salish Sea as they have for thousands of years. Here, the suq̓wabs̓ live and protect the land and waters of their ancestors for future generations as promised by the Point Elliot Treaty of 1855.

1.1.3 Organization of the Final EIS

The [Draft EIS](#) lays the foundation for the initial environmental analysis that was conducted and is a companion document to this Final EIS and incorporated by reference in accordance with Washington Administrative Code (WAC) 197-11-635. The information provided in this Final EIS attempts not to duplicate or repeat information presented in the [Draft EIS](#), except to provide context to the reader. The exception to this is where additional or updated information is included to provide context or supplement information included in the [Draft EIS](#). The Final EIS focuses on analysis of the Preferred Alternative, a chapter on Corrections and Clarifications, and a chapter on Comments and Responses to Comments. The reader should refer to both the [Draft EIS](#) and the Final EIS documents in order to obtain all of the information analyzed during the EIS process.

1.1.4 Objectives

SEPA requires a statement of proposal objectives and the purpose and need to which the proposal is responding. Alternatives are different means of achieving objectives. The objectives of the Poulsbo Comprehensive Plan 2024 Update include the following:

- Address state and regional goals and requirements.
- Comply with comprehensive plan periodic review requirements to meet state laws including changes to the GMA since the last periodic review and to align with the regional growth strategy in the PSRC VISION 2050.
- Demonstrate capacity to accommodate housing and jobs growth targets through 2044.
- Meet legislative requirements and countywide planning policies for affordable housing and housing types
- Provide a variety of employment opportunities and commercial services for Poulsbo residents and visitors.
- Support economic development and business for prosperous community and economic vitality.
- Support transit, non-motorized and other alternative transportation modes through appropriate housing choices, employment opportunities, and multimodal transportation infrastructure.
- Ensure that public services, multimodal transportation infrastructure and capital facilities can be efficiently and effectively provided to support forecast development at appropriate levels of service.
- Enhance access to parks, recreation, and cultural amenities.

1.2 SEPA Process

1.2.1 Overview

Under the State Environmental Policy Act (SEPA), agencies conduct environmental review of actions that could affect the environment – including policy and regulation changes (considered non-project actions). Preparation of an EIS is required for actions that have potentially significant impacts so that the public, agencies, Tribes, and City decision-makers have information about the environmental effects of changes before a decision is made.

See the graphic below for an overview of the EIS process. The Final EIS is part of Phase 4. The EIS evaluates alternative approaches to growing the City’s population, employment, and housing capacity.

Exhibit 1.2.1-1: Comprehensive Plan EIS Process Timeline



1.2.2 Draft EIS

The [Draft EIS](#) identified environmental conditions, potential impacts, and measures to reduce or mitigate any unavoidable adverse impacts that could result from the City of Poulsbo Comprehensive Plan Update. Public and agency comments were invited on the [Draft EIS](#). Written and verbal comments were invited during the 30-day public comment period following issuance of the [Draft EIS](#). Public comments were considered and addressed in this Final EIS.

The City of Poulsbo requested comments from citizens, agencies, tribes, and all interested parties on the [Draft EIS](#) during a 30-day period from January 17 to February 18, 2025.

This [Draft EIS](#) evaluated each of the following topics for the four alternatives:

Natural Environment

- Earth
- Air Quality
- Water Resources (Surface Water and Groundwater)
- Fish, Wildlife, Plants

Built Environment

- Land and Shoreline Use
- Plans & Policies
- Population, Housing & Employment
- Transportation
- Cultural and Historic Resources
- Public Services and Utilities

1.2.3 Final EIS

This document is the Final EIS and includes responses to public comments received during the [Draft EIS](#) comment period. A Preferred Alternative was developed based on the analysis included in the [Draft EIS](#), a review of public comments received during the 30-day period from January 17 to February 18, 2025, and Planning Commission and City Council feedback during March 11, 2025, joint workshop.

1.2.4 Phased Review

Phased review of the proposal pursuant to WAC 197-11-060(5) is anticipated. Phased review assists agencies and the public to focus on issues that are ready for decision and exclude from consideration issues already decided or not yet ready. In phased review, broader environmental documents, such as the EIS for this proposal, may be followed by narrower documents that incorporate prior general discussion by reference and concentrate solely on the issues specific to that phase of the proposal.

1.3 Preferred Alternative

The [Draft EIS](#) Alternatives were evaluated upon the alternative's ability to accommodate the City's population, employment and housing targets as assigned by PSRC VISION 2050 and the Kitsap Countywide Planning Policies. For the City of Poulsbo, the adopted 2020-2044 growth targets are: **5,646 new persons, 4,000 new jobs, and 1,977 new housing units.**

Alternative 4 has been chosen as the City's preferred alternative, and includes the effects of PSRC's VISION 2050, updates to Regional Centers Framework, and the Kitsap Countywide Planning Policies.

1.3.1 Preferred Alternative: SR 305 Corridor Center and Increase Density in Residential Medium and Residential High Zoning Districts

Alternative 4 includes the SR 305 Corridor Center increased capacity assumptions and adds increased density to the Residential Medium (RM) and Residential High (RH) zoning districts by increasing the maximum density range. RM density would increase from 6-10 units/acre to 6-14 units/acre; and RH would increase from 11-14 units/acre to 15-22 units/acre. Residential Low (4-5 unit/acre) remains the same as currently adopted.

This alternative also adds capacity to our commercial districts, specifically to SR305 as the assumption is that the increase in height for mixed use building along the corridor will spur development and remodeling of existing and underutilized properties resulting in an increase in commercial opportunity.

This alternative assumes changes to the future land use designations currently shown on the City’s Comprehensive Plan Land Use Map, as well as policy, zoning and regulation changes associated with this alternative. Exhibit 2.4.5-2 maps the future land use designation and zoning for Alternative 4, identifying a SR 305 Corridor Center and increased residential density ranges for the RM/RH zoning districts. Alternative 4 also continues to include Alternative 2 Missing Middle Emphasis capacity increase in the RL zoning district.

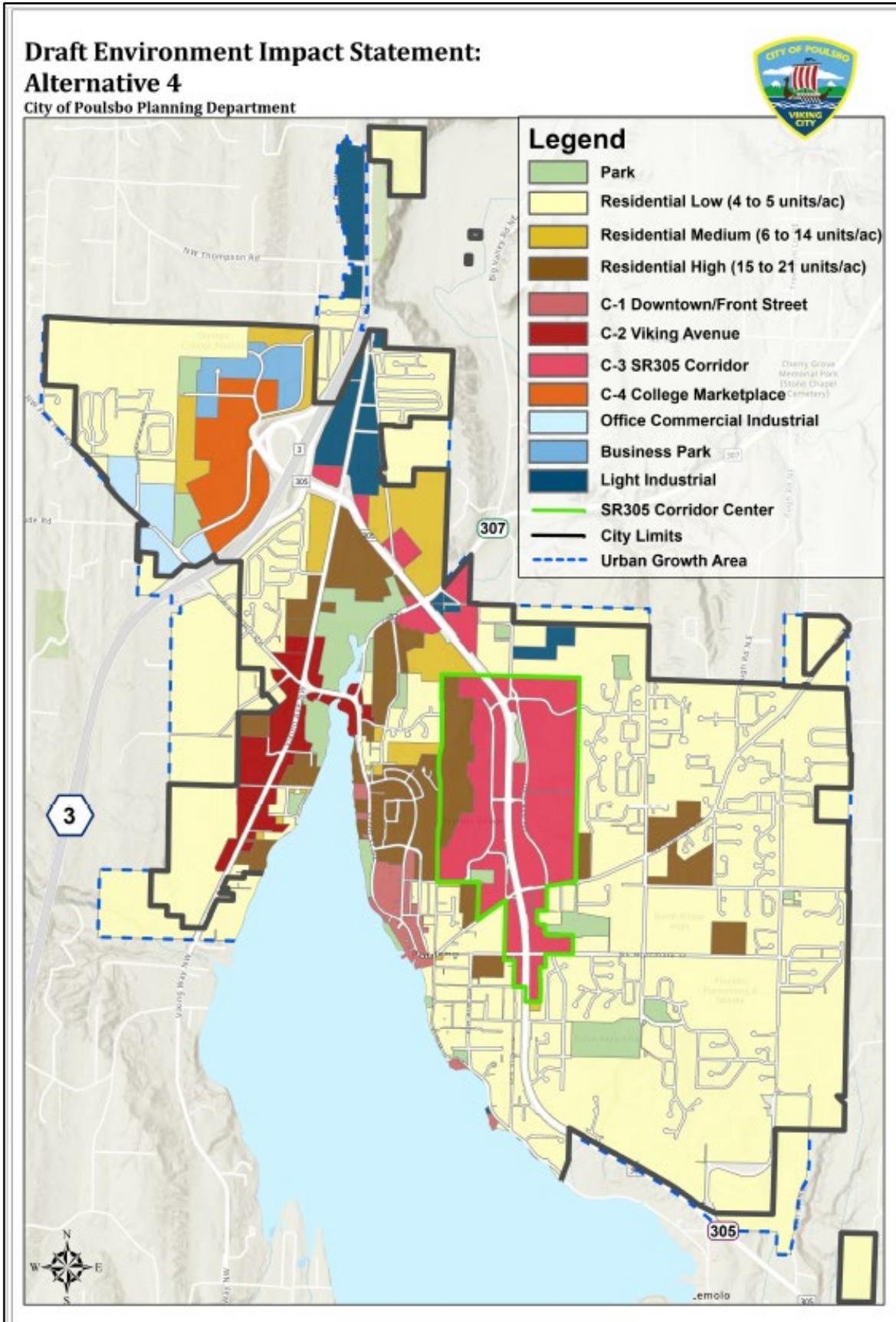
Exhibit 1.3-1 summarizes the employment, population, and housing capacity by land use category.

Net growth would equal:

- Employment: 4,099 new jobs between 2024-2044
- Population: 7,961 new people between 2024-2044
- Housing: 3,491 new housing units between 2024-2044

Exhibit 1.3-1: Alternative 4 - SR 305 Corridor Center + RM/RH density range increase			
Land Use Category	Employment Capacity	Population Capacity	Housing Unit Capacity
Residential Low	0	3,974	1,583
Residential Medium	0	1,601	766
Residential High	0	1,317	630
C-1 Downtown/Front Street	118	269	129
C-2 Viking Avenue	604	0	0
C-3 SR 305 Corridor	1991	800	383
C-4 College Marketplace	348	0	0
Office Commercial Industrial	435	0	0
Business Park	441	0	0
Light Industrial	162	0	0
Total	4,099	7,961	3,491
<i>KRCC Growth Allocation</i>	<i>4,000</i>	<i>5,646</i>	<i>1,977</i>
<i>Surplus/Deficit</i>	<i>+99</i>	<i>+2,315</i>	<i>+1,514</i>

Exhibit 1.3-2: Preferred Alternative 4 Land Use Map



Chapter 2.0 | Draft EIS Comments and Responses



2.1 Draft EIS Comments

This section of the Final EIS summarizes the comments received on the Draft EIS from October 18 to December 2, 2024. Approximately 40 written comments were received on the Supplemental Draft EIS 2023. Exhibit 2.1-1 reports the commenters and date of submittal; Exhibit 2.1-2 summarizes the comment letters' content and FEIS response. Appendix A includes the submitted DEIS comment letters.

Exhibit 2.1-1: Draft EIS Commenters			
Letter Number	Name	Agency/Organization	Date
1	Keith Bierman	N/A	1/29/2025
2	Charlie Thompson	Fishline	2/10/2025
3	Bill McCoy	N/A	2/17/2025
4	Edie Lau	N/A	2/17/2025
5	Ian Harkins	Kitsap Building Association	2/18/2025
6	Rod Malcom	The Suquamish Tribe	2/18/2025

2.2 Draft EIS Responses

Exhibit 2.2-1 provides a summary of the comments on the [Draft EIS](#) and responses to the comments. Where comments reflect a preference for an alternative or state an opinion regarding a topic, responses indicate that the comments are noted and forwarded to City decision makers. For topics that include comments or questions about the environmental analysis or alternatives, a response is provided. Where [Draft EIS](#) corrections are made as a result of comments, please see Section 2.4.

Exhibit 2.2-1: Summary of Draft EIS Comments		
Comment No.	Comment	Response
1	Keith Bierman	
1.1	I'm writing to provide comment on the Comprehensive Plan. I fully support alternative four. Aggressive action will be necessary to adapt our town for growth. I'm urging the city council to fully endorse alternative four.	Alternative 4 was chosen as the preferred alternative by the Planning Commission and City Council at their 3/11/25 meeting .
2	Charlie Thompson, Fishline	
2.1	I am writing to provide comments on the Draft Environmental Impact Statement for the City of Poulso's 2024 Comprehensive Plan Update. I am both a resident of Poulso and the Executive Director of Fishline. Each day I witness the challenges our residents have with affordability. People utilizing Fishline's services work hard, and it simply is not enough because the cost of housing and other basic needs are out of reach. The Draft EIS identifies four alternative paths for Poulso. I implore you to choose the path that provides the most options for affordable housing, Alternative 4. Importantly, according to the Draft EIS, "Housing affordability would continue to be a challenge in Poulso under all alternatives due to the pressures of regional population and employment growth." Knowing that challenges to affordability will continue under all four alternatives only increases the need to choose Alternative 4. We must do what is necessary to provide as much affordable housing as possible. Thank you for your time and consideration of my comments.	Alternative 4 was chosen as the preferred alternative by the Planning Commission and City Council at their 3/11/25 meeting .
3	Bill McCoy	
3.1	In my opinion, supporting Missing Middle Housing (Alternative 2) and mixed use in Hwy 305 Corridor (Alternative 3) along with increasing density in RM/RH zones (Alternative 4) is clearly the optimal direction to sensibly grow the Poulso community. Successfully implemented, Alternative 4 (which includes Alternatives 2 & 3) will help to concentrate Poulso's growth in more walkable/bikeable and transit-friendly areas while supporting a diversity of household types and income levels in the community. However, without more emphasis on zoning regulation and process changes the planned for growth from increasing density in RM/RH and enabling Middle Housing very likely won't happen, because development won't be economically viable, i.e. it won't "pencil" for developers. We'll continue to get mostly upscale detached single-family homes plus a few large apartment complexes, all in car-centric areas in the outskirts of the City, while RM/RH lots closer to town remain undeveloped. Obviously, this is what's currently happening. As the EIS indicates (p.131) from 2020-2024 391 single-family homes were permitted in the RL zone, while no multi-family units at all were permitted in the RH zone. Development in RH, Poulso's densest zone, isn't happening, because it won't pencil on these remaining - nearly all critical-area-burdened - properties given parking, landscaping, and other requirements and the costly and unpredictable site plan review process. Poulso can't just add more theoretical density (Alternative 4) and expect it to magically get utilized. Achieving more density in RM/RH - even achieving current density - will necessitate significant adjustments to zoning regulations and processes.	Alternative 4 was chosen as the preferred alternative by the Planning Commission and City Council at their 3/11/25 meeting .
3.2	And, what multi-family that has been built or permitted in recent years is almost entirely large rental apartment projects (90 to 468 units), across major streets and highways from downtown, despite there being many smaller parcels in RM/RH zones, closer to downtown, that could support Middle Housing scale developments that would be more walkable, bikeable, and transit-friendly, and in many cases offered for sale and thus a pathway to homeownership. These large apartment complexes, despite their parking lots, ironically increase rather than reduce Poulso's street-parking burden because if the residents come downtown, they drive. We are getting only large-scale projects because the significant fixed costs of Poulso's development processes and requirements are only bearable if amortized across a large number of units. And because Poulso's car-centric parking requirements - that basically require as much space for parking lots as for buildings - don't work for our remaining smaller lots, that generally also come with slopes. So since Middle Housing doesn't pencil now on smaller lots in zones where it's already allowed, also allowing it in RL (Alternative 2) - generally on even smaller lots - won't magically make it happen. Achieving the planned growth from Middle Housing will also necessitate significant adjustments to zoning regulations and processes. Just two specific adjustments would significantly close the plan goals vs. economic reality gap: <ol style="list-style-type: none"> Reduce multi-family off-street parking requirements for multi-family developments from 1.75 space per unit net to 1 space per unit. Eliminate all standards (e.g. setbacks, building perimeter landscaping) and mandated processes (e.g. architectural design review) for developing multifamily units on existing parcels that are more restrictive than the standards and processes required for developing detached single-family residences on existing parcels. <p>These two broad-brush changes could be limited or conditioned to mitigate any potential negative impacts. For example, the changes could be applicable only to multi-family infill in any residential zone (e.g. projects of less than 20 units), developments outside the historic Downtown zone, and/or excluded in situations of more public concern (e.g. RM/RH when adjacent to RL). Parking reductions could be applicable only if a study supports a surplus of on-street parking, and/or could start smaller (eliminate the .25 per unit guest parking space, allow reduction from 1.5 to 1 space for 1BR units as well as studios, and make the senior parking requirement 1 space rather than 1.25 and applicable to age 55+ rather than age 65+).</p> <p>I will be happy to provide more specific input when the time comes for Council and staff to consider new zoning regulations, I am providing this feedback now because I think Council and staff should ideally clarify in the EIS that changes to enable the chosen Alternative will likely need to be significant, given historical trends, and should definitely be prepared to entertain such significant changes. I am a part-time small-scale developer and real estate broker with limited experience. Staff and other citizens may well have much better ideas about how to enable the sensible growth Poulso needs. So I respectfully encourage Council and staff to solicit and carefully consider all ideas in that stage of the process, even - especially - ideas that are "out of the box" rather than "business as usual".</p>	Comments regarding the need to adjust landscaping, parking and other regulations that may be barrier to middle housing unit types and higher densities are noted and will be evaluated during the zoning ordinance amendment process. The City commissioned a market study that evaluated mixed use and higher density opportunities and barriers in Alternative 4's SR 305 Corridor, and will also use this study to inform needed amendments.
4	Edie Lau	
4.1	Thank you for the opportunity to comment on the City of Poulso 2024 Comprehensive Plan Update Draft Environmental Impact Statement. The document is well-organized, clear and fairly thorough. Kudos. As a long-time city resident who cherishes the community's natural environment, I am heartened by the many references in the DEIS to supporting active transportation, including making bicycling and walking safer and more inviting, and the attention paid to facilitating and increasing opportunities for public transit.	Comment noted. Thank you.

4.2	<p>Section 3.2 Air Quality/Climate. Regarding wildfire smoke: "It is important to note that the City has no control over wildfires" (p. 20, repeated on p.71). Actually, there is a major step that the City of Poulsbo can take to significantly decrease the chances of wildfire ignition during the dry season: Ban fireworks. Poulsbo is one of a rapidly decreasing number of municipalities in Western Washington that continue to allow personal fireworks on the Fourth of July. In addition to the considerable fire and personal safety danger posed by fireworks, they terrify household pets and wildlife, trigger many combat veterans, and fill the air with particulate matter that raises the risk of cardiovascular disease to everyone in the airshed. Let's tap our community creativity and find healthier ways to celebrate.</p> <p>As an attendee of an excellent wildfire resilience workshop hosted by the Poulsbo Fire Department in coordination with the conservation districts of Mason and Kitsap counties in early October, I suggest consulting with the fire department for more ideas that the City could consider toward reducing wildfire risk in our community.</p> <p>Also in this section, as a mitigation measure, consider disallowing the use of methane (natural gas) in new construction.</p>	Clarification provided. Please see Section 2.3.
4.3	<p>Section 3.11 Utilities. The impacts section (3.11.2, page 184) states: "Solid waste impacts are generally the same across all alternatives as increased garbage and recycling services will be necessary for housing and job growth." To mitigate increased solid waste generation, consider adding an explicit reference to composting of food and yard waste. Elsewhere in the plan (section 3.2.3, p. 75), reduction of food waste is cited as a mitigation measure, but the document does not specify how. One answer is curbside pickup of organic material — not just large containers of yard waste but smaller ones of kitchen waste — which has become a standard municipal service in communities across the country. Poulsbo need look no farther than Seattle for an example. Here are three final suggestions that support the goals and policies delineated in this document.</p> <ol style="list-style-type: none"> To promote active transportation, add bicycle racks throughout the city. Creative rack designs can double as public art. Throughout the document are references to walkability and access to public transit. However, under development that has occurred to date, we have seas of houses and no services, particularly on the west and east sides of the city. The quality of life in Poulsbo would be raised substantially if the City were to allow and encourage small businesses (such as corner stores and neighborhood cafes) within a half- to one-mile walk of housing developments. Such action would be consistent with Policy ED-1.5 (p. 112): "Foster a culture of creativity, entrepreneurship and innovation which helps promote job growth and new business creation, including artisanal and small-scale producers, such as the craft food and beverage industry." <p>Add a mini traffic circle at Caldart and Mesford. Since the four-way stop at that intersection was eliminated, it has become increasingly difficult for westbound traffic on Mesford to turn onto Caldart, especially but not exclusively during school start and release hours. Congestion and backups at that intersection will increase when the housing development north of St. Olaf's Church is completed. The plans for mini circles elsewhere in the area, listed in the DEIS, are encouraging. Please don't overlook this intersection.</p>	<p>Clarifications provided. Please see Section 2.3.</p> <p>Neighborhood Commercial is currently allowed as set forth in PMC 18.70.070.F.6.</p> <p>Comment regarding mini traffic circle at Caldart and Mesford is forwarded to City's Transportation Comprehensive Plan consultant for evaluation and inclusion if appropriate.</p>
5 Ian Harkness, Kitsap Building Association		
5.1	<p>The Kitsap Building Association (KBA) writes to express our strong support for Alternative 4, which focuses growth within the SR 305 Corridor Center while increasing density in the Residential Medium (RM) and Residential High (RH) zoning districts. As an organization dedicated to promoting responsible growth and housing affordability, we recognize that this proposal is a necessary step toward addressing Poulsbo's housing needs.</p>	Alternative 4 was chosen as the preferred alternative by the Planning Commission and City Council at their 3/11/25 meeting .
5.2	<p>Why Alternative 4 is the Right Choice. The proposed density increases—expanding RM zoning from 6-10 units per acre to 6-14 units per acre and RH zoning from 11-14 units per acre to 15-22 units per acre—will:</p> <ul style="list-style-type: none"> Increase Housing Supply – By allowing for greater density in key areas, this plan will help alleviate the ongoing housing shortage and improve affordability for residents. Support Smart Growth & Transportation Access – Concentrating growth along the SR 305 Corridor aligns with transit-oriented development principles, reducing reliance on cars and improving access to public transportation, jobs, and services. This aligns with increased environmental preservation while also providing a greater area for open space in development. Preserve Neighborhood Character While Meeting Housing Demand – This approach strategically targets growth in appropriate zoning areas while maintaining the existing densities in Residential Low (RL) zones, ensuring balanced and sustainable development. <p>Encourage Economic Growth – Increased housing density supports local businesses, infrastructure investments, and workforce housing, contributing to a more resilient and vibrant economy.</p>	Alternative 4 was chosen as the preferred alternative by the Planning Commission and City Council at their 3/11/25 meeting .
5.3	<p>The Importance of Proactive Zoning Adjustments. As Poulsbo continues to grow, zoning policies must evolve to ensure that new housing can meet demand without sprawl or excessive infrastructure strain. By adopting Alternative 4, the city will be taking a forward-thinking, sustainable approach that aligns with the goals of affordability, accessibility, and economic development. The Kitsap Building Association strongly urges the City to approve Alternative 4 to provide much needed housing opportunities while supporting responsible and strategic growth. We appreciate your leadership in shaping policies that benefit both residents and the broader community.</p>	Alternative 4 was chosen as the preferred alternative by the Planning Commission and City Council at their 3/11/25 meeting .
6 Rod Malcom, The Suquamish Tribe		
6.1	<p>The Natural Resources Department of Suquamish Indian Tribe of the Port Madison Reservation appreciates the opportunity to review the "<i>Draft Environmental Impact Statement (DEIS or Draft EIS) for the City of Poulsbo 2024 Comprehensive Plan Update</i>". The area covered by the update lies entirely within the Suquamish Tribe's aboriginal homeland and includes treaty reserved fishing areas and hunting and gathering areas. The Tribe seeks protection of all treaty-reserved natural resources through avoidance of impacts to habitat and natural systems. The Tribe urges the City of Poulsbo to avoid land use decisions that will impact natural resources within the Tribe's territory, including impacts to the shorelines and waters of the Tribe's usual and accustomed fishing areas (U&A).</p> <p>The Tribe has the following general comments on the DEIS.</p> <ol style="list-style-type: none"> Natural environment section needs more detail, including maps that show pocket estuaries, better show stream locations, 303(d) listed streams, etc. As the current wetland and stream buffers the DEIS incorporates are not supported by Best Available Science, the level of protection afforded will be less than assumed. Buffer averaging. The interactive effects of climate change and development upon buffer function and values and stream water quality and quantity are not fully considered. Assumptions, both implicit and explicit, and the caveats in various manuals that affect the effectiveness of mitigation measures or analysis of impacts are not presented. Incomplete consideration of the impacts of new impervious surfaces. 	<p>Comments from The Suquamish Tribe Rod Malcom are noted and responses are provided in comments below.</p> <p>In general, Mr. Malcom's comments are anticipated to be addressed in 1) upcoming update to the City's Critical Areas Ordinance as part of the periodic update, 2) adoption by the City of the Department of Ecology's 2024 Stormwater Manual, required action by 2027, 3) site specific application review, and 4) adoption of Climate Change and Resiliency chapter and documentation, required by 2029.</p> <p>Further, the Planning Director and Planning Manager met with Mr. Malcom on February 18, 2025, to seek clarifications on comments and discuss concerns.</p>

6.2	<p>Unlike many similar documents, the DEIS (Exhibit 3.4.1-4: Fish and Wildlife Habitat Conservation Areas) provides a map of forage fish locations. Additionally, the DEIS gives considerable attention to the estuarine conditions of Liberty Bay. However, the focus on Liberty Bay within or adjacent to the City needs to be expanded to include pocket estuaries (often found at stream mouths) which are important areas for juvenile salmonids. Several pocket estuaries are found within the City or the steams, such as Bjorgen Creek or Johnson Creek, discharging into these pocket estuaries originate in the City. The following map was retrieved 7 February 2025 from the NOAA website¹. The importance of these pocket estuaries should be discussed in the FEIS and an appropriate map included.</p>	<p>Comment Noted. See additional information on pocket estuaries in FEIS Section 2.3.</p>
6.3	<p>The current buffer averaging and variance processes used by the City do avail themselves of Best Available Science and particularly, the Critical Areas Regulation does not require a robust analysis of impacts to determine there will be no net loss. There is an assumption that area equates to value; however, the more distal portions of the buffer typically provide less value and the documents supporting buffer averaging typically do not provide a quantitative analysis of the values lost due to the decreased buffer compared to those gain in the increased portion of the buffer. Additionally, the temporal loss of function is typically not quantitatively described, such as the time required for newly planted areas in the expanded portion of the buffer to reach the same basal area or canopy coverage as the areas prior to buffer reduction.</p>	<p>Poulsbo is required to update the Critical Areas Ordinance (CAO) as part of the periodic update effort. Evaluation of and inclusion of Best Available Science is a component of the CAO update process. Reviewing new and updated guidance from state resource agencies will occur during the periodic update effort in 2025.</p> <p>Currently, the City's CAO allows buffer averaging only for wetlands and follows the Department of Ecology (Ecology) guidance. If Ecology's guidance has been updated regarding wetland buffer averaging, this will be captured during the CAO update effort. The CAO does not include a variance process.</p> <p>No net loss is identified in the following CAO Sections: PMC 16.20.130(7), 16.20.133(4), 16.20.150, 16.20.205(A), 16.20.235(E)(2), 16.20.735(B). Wetland Mitigation Sequencing is identified in the following CAO Sections: PMC 16.20.240, 16.20.735(A).</p>
6.4	<p>The known impacts of development and urbanization upon the stream hydrology and physical conditions are, in some cases, similar to that expected from climate change (Table 1). Development and climate change will act additively, and probably synergistically, to impact stream channels, wetlands, and the species that depend upon those habitats, as well as nearshore habitats.</p> <p>The DEIS did not consider the additive and synergistic effects of development and climate change, and propose mitigation measures that ensure development does not continue to make stream and nearshore habitats more vulnerable (less resilient) to climate change. Given climate change, the EIS should take a precautionary approach when describing the effectiveness of mitigation measures or land use regulations, and be cautious when scientific knowledge is uncertain and not use the absence of adequate scientific information as a reason to postpone action or fail to take action to reduce the potential for serious harm to the environment. The EIS is the appropriate document to address and communicate to the elected officials and decision makers project specific and cumulative adverse environmental impacts and requirement for new and additional mitigation measures to protect anadromous habitat.</p>	<p>Comment Noted. Climate change impacts to fish and wildlife habitat (streams and wetlands) are identified in Section 1.5.1.4 "Stressor associated with climate change are projected to significantly impact fish and wildlife species, including Chinook, coho salmon, steelhead and bull trout, and amphibians." Poulsbo is required to prepare a Climate Change and Resiliency Element under HB 1181, to be included as a Comprehensive Plan Element by 2029.</p>
6.5	<p>The DEIS lists numerous explicit assumptions and contains numerous implicit statements stating or suggesting that following various manuals will prevent adverse impacts or reduce to non-significance. However, these manuals contain assumptions and caveats that are generally not known to City staff or decision makers. The FEIS should include a listing of explicit and impact assumptions and caveats in these manuals that affect the ability to achieve the desired level of environmental protection.</p> <p>For example, the 2019 Stormwater Manual contains explicit and implicit assumptions and caveats that should be considered in the EIS to ensure decision makers have a better understanding of the impacts of stormwater as well as manual limitations. This limitations and caveats are carried forwarded into the 2024 Stormwater Manual. There is no support for a position that flow control duration that limits or prevents channel erosion also directly protects aquatic life. Impacts to aquatic life occur at much lower flow than that will produces adverse effects on aquatic biota.</p> <p>The stormwater manuals do not consider the potential impact of development and stormwater management increasing the duration of stream flows with velocities that adversely impact aquatic life in the absence of flow events that could cause channel erosion. Additionally, these manual do not address cumulative impacts of projects that are exempt from the flow duration controls, resulting in cumulative impact upon stream flows.</p>	<p>Poulsbo is required to utilize the Department of Ecology Stormwater Manual, which is upon adoption, meeting the state requirements for stormwater management. Currently, Poulsbo utilizes the 2019 Stormwater Manual, and evaluates additional impacts on a site specific project application process. Poulsbo is required to adopt the 2024 Ecology Stormwater Management Manual by 2027.</p>
6.6	<p>Though the DEIS mentions reduction in infiltration, nothing is proposed to quantify the reduction in the volume that is infiltrated and thus the potential impact to groundwater recharge, interflow, and stream base flows. Additionally, the current version of the CAO does not require such quantification.</p> <p>Reductions in water available for infiltration due to the presence of impervious surface areas will have negative consequences for instream resources. The City must consider requiring development that does not have 100% infiltration to calculate the difference between pre- and post-development runoff with any increase in runoff being water being considered water no longer available for infiltration. Numerous studies have shown that during low flow periods even small amounts of flow between pools containing juvenile salmonids are the difference between a stream supporting salmonids or not. Therefore, it should be considered that even small reductions in infiltration could have significant impacts upon whether juvenile salmonids can use streams with low flow.</p>	<p>Poulsbo is required to utilize the Department of Ecology Stormwater Manual, which is upon adoption, meeting the state requirements for stormwater management. Currently, Poulsbo utilizes the 2019 Stormwater Manual, and evaluates infiltration on a site specific project application process</p>
6.7	<p>Channel Migration Zones, as mapped by the Washington Department of Ecology. Suggest the list of mappers be expanded to include DNR, USGS, City of Poulsbo, etc.</p>	<p>Comment noted and will be considered during the CAO mapping update.</p>
6.8	<p>High Geological Hazard Zones. The runout zone from areas mapped as landslide hazards should also be considered a hazard.</p>	<p>Comment noted and will be considered during the CAO mapping update.</p>
6.9	<p>Channel erosion can occur along the banks of streams with steep slopes and high flow velocities. To avoid the implication that channel erosion is restricted to the banks of streams with steep slopes and high flow velocities, suggest wording to the effect, "<i>Erosion of stream channels and banks can increase the risk of erosion and landslides</i>".</p>	<p>Comment Noted. See clarification in FEIS Section 2.3.</p>
6.10	<p>An increase in impervious surfaces may result in changes to surface water and ground water quality and quantity. Suggest "<i>may result</i>" be changed to "<i>typically results</i>". See "<i>Assumptions, both implicit and explicit, and the caveats in various manuals</i>" in main narrative.</p>	<p>Comment Noted. See clarification in FEIS Section 2.3.</p>

6.11	<p>This Alternative also encourages vertical development by increasing the maximum building height allowance. This allowance would reduce the impervious surface construction compared with low-rise development of similar capacity and could be considered a stormwater runoff mitigation strategy in densified areas. The narrative focuses on stormwater runoff, but there is also impacts to groundwater recharge and shallow interflow.</p> <p>However, the increased in total runoff from a site means there is less water available for infiltration and thus potentially less water available to recharge groundwater or provide water for interflow. Groundwater interflow is the lateral movement of water that moves through the unsaturated zone and returns to the surface or enters a stream. It's a key component of the water cycle, contributing to groundwater recharge and maintaining stream flow. See also "<i>Assumptions, both implicit and explicit, and the caveats in various manuals</i>" in main narrative.</p>	Comment noted.
6.12	<i>Policy NE-5.3.</i> Much of the area around Johnson Creek should be considered as a wildlife corridor.	Comment noted.
6.13	Poulsbo has a variety of water resources including streams, marine and estuarine waters, frequently flooded areas, groundwater, aquifer recharge areas, wetlands, and stormwater runoff. Often when people think of estuarine waters, they think of large bodies of water. However, there are much smaller estuaries associated with smaller streams. These are called pocket estuaries and are important areas for juvenile salmonids. Several pocket estuaries are found within the City or the steams, such as Bjorgen Creek or Johnson Creek, discharging into these pocket estuaries originate in the City. The following map was retrieved 7 February 2025 from the NOAA website. The importance of these pocket estuaries should be discussed in the EIS and an appropriate map included.	Comment Noted. See additional information on pocket estuaries in FEIS Section 2.3.
6.14	Exhibit 3.3.1-1: Liberty Bay Watershed. Information about the source of maps and date of currency would be helpful. Additionally, a numbering system for the streams with a legend matching the numbers to the stream name, if there is a name would help. For those streams that have names on the figure, the names are impossible to read. Higher resolution would help this.	Comment noted. The source of Exhibit 3.3.1-1 is the City's TMDL Implementation Plan , Figure ES-1, page ES-3. Scale of map in plan is larger and stream names can be reviewed. Also Exhibit 3.3.1-3 Poulsbo Streams map is of larger scale.
6.15	The City's wetland mapping indicates general locations and patterns of wetlands but is too general for identifying wetlands on specific sites. Suggest that wording to the following effect be added, " <i>The absence of a wetland on the map does not mean that there are no wetlands on or near a property.</i> "	Comment noted and will be considered during the CAO mapping update.
6.16	The city requires site-specific wetland delineations by qualified professionals to confirm wetland boundaries and wetland classifications. In addition to this wording, the EIS should include what the requirements are for an applicant to demonstrate that a wetland does not exist on a site.	Comment noted.
6.17	Exhibit 3.3.1-3: Poulsbo Streams. The streams in this figure show poorly here compared to Fig 3.3.1-1 where the streams are easy to see against the background. Additionally, the blue dashed lines, are times, appear to be a stream. A different color is suggested. Furthermore, suggest the names of streams be moved so they do not obscure stream location (for example, Main Fork Dogfish Creek).	Comment noted and will be considered during final comprehensive plan review.
6.18	Flooding is caused by excess surface water runoff . Flooding can also be caused by high tides in the absence of surface water runoff.	Comment noted.
6.19	In developed areas, impermeable surfaces divert water that would normally be absorbed to recharge the aquifer. Not all water goes into aquifers, a considerable amount goes into non-aquifer related groundwater or interflow.	Comment noted.
6.20	The following criteria are used to designate Critical Aquifer Recharge Areas (PMC 16.20.510). The wording in this section can overlook recharge areas that do not contribute to aquifers, but support stream flows, particularly low flows.	Comment noted.
6.21	Water Quality. A map of 303(d) listed streams would be helpful.	Comment noted. See additional information on 303(d) listed streams in FEIS Section 2.3.
6.22	Impacts Common to All Alternatives. This section concentrates on water quality not quantity. One result of increased impervious surface area is that excepting projects with 100% infiltration of pre-development infiltration volume there will be decreased volume of precipitation infiltrating into the ground, with potential impacts on stream baseflows.	Comment noted.
6.23	The development growth associated with every alternative would likely result in increased hard surfaces, increased vehicle use, and decreased vegetation, all of which can negatively impact surface water resources. " <i>Would likely</i> " should be change to " <i>will</i> ".	Comment Noted. See clarification in FEIS Section 2.3.
6.24	Impacts on water quality from intensification of development under Alternatives 1 and 2 are assumed to be proportional to the amount of impervious surface created in specific areas. Impacts to wetlands and streams would be consistent with those described above in Impacts Common to All Alternatives. Impacts to overall water quality are expected to occur where clearing associated with development activities results in increased sediment transport to streams. Development of properties with environmentally critical areas could result in increased impacts to wetland and riparian habitat functions and values. There will be impacts to both quality and quantity and that should be included in the narrative for consistency with the table on page 84 which mentions reduced groundwater recharge. The table on page 84 indicates for all alternatives there is no or low impact to groundwater recharge. However, there is no analysis to support this statement. Furthermore, as runoff can be considered in terms of peak runoff or total volume of runoff, one can come to different conclusions regarding impact if one considers peak or total runoff.	Comment Noted. See clarification in FEIS Section 2.3.
6.25	<i>Policy LU-15.1:</i> The CAO does not appear to require a quantification of the impacts of reduced infiltration on local groundwater recharge.	Comment noted and will be considered during the CAO update.
6.26	<i>Consider improved fish passage when making transportation facilities improvements.</i> When transportation facilities are improved, fish passage should be a requirement.	Comment noted and will be considered during the CAO update.
6.27	The stormwater manuals listed on page 86 are incapable of providing the desired mitigation and simply slow the rate of decline. See " <i>Assumptions, both implicit and explicit, and the caveats in various manuals</i> " in main narrative for more details.	Comment Noted. Poulsbo is required to utilize the Department of Ecology Stormwater Manual, which is upon adoption, meeting the state requirements for stormwater management. Currently, Poulsbo utilizes the 2019 Stormwater Manual, and evaluates additional impacts on a site specific project application process. Poulsbo is required to adopt the 2024 Ecology Stormwater Management Manual by 2027.

6.28	Exhibit 3.4.1-2. A disclaimer should be included that salmonids can be found in streams that are not mapped. Additionally, backwater areas, off-channel habitats, and wetlands that might not meet the definition of a stream, and thus not be mapped, are often used by fish.	Comment noted and will be considered during the CAO update.																				
6.29	Exhibit 3.4.1-4. Pocket estuaries, both those located in the City as well as those outside the City, but whose associated stream arises in or flows through the City should be included.	Comment Noted. See additional information on pocket estuaries in FEIS Section 2.3.																				
6.30	Population growth and associated urbanization impacts to fish and wildlife habitat conservation areas are likely under all alternatives. The wording “ <i>are likely</i> ” should be changed to “ <i>will occur</i> ”.	Comment Noted. See additional information on pocket estuaries in FEIS Section 2.3.																				
6.31	Stressors associated with climate change are projected to significantly impact fish and wildlife species, including Chinook, coho salmon, steelhead and bull trout, and amphibians. Climate change impacts are often similar to those of development and the cumulative effects should be considered. See “ <i>Interactive effects of climate change and development</i> ” in main narrative for more detail.	Comment Noted.																				
6.32	Increased stormwater runoff from new impervious surface areas and roadways may result in increased contaminants. “ <i>May</i> ” should be changed to “ <i>will</i> ” for consistency with the 2019 Stormwater Manual. See “ <i>Assumptions, both implicit and explicit, and the caveats in various manuals</i> ” for more details.	Comment Noted. See additional information on pocket estuaries in FEIS Section 2.3.																				
6.33	Aquatic species may be impacted by loss of habitat due to development or alteration of habitat due to changes in water quality and quantity that may occur under each alternative. “ <i>May</i> ” should be changed to “ <i>will</i> ” for consistency with the 2019 Stormwater Manual. See “ <i>Assumptions, both implicit and explicit, and the caveats in various manuals</i> ” for more details.	Comment Noted. See additional information on pocket estuaries in FEIS Section 2.3.																				
6.34	Resulting impacts could include increased water temperatures, sedimentation, increased peak flows, reduced groundwater recharge , increased shoreline armoring, channelization, and overall reduced riparian and wetland habitats. Development usually typically increases the frequency and duration of flow events below the targeted release rate. These flows, while not having geomorphic impacts, can impact aquatic life directly.	Comment Noted.																				
6.35	Reduced forest and riparian habitat and increased impervious surface area are expected to reduce groundwater recharge and infiltration, reduce streamflow , and increase runoff. In this section, development is expected to reduce groundwater recharge and stream. This is much stronger statement – and a correct statement – than that found in the Water Resources section.	Comment Noted.																				
6.36	Direct impacts on fish habitat will be minimized by regulatory buffer requirements and the timing of in-water work windows established by state and federal agencies to protect fish. Current state and City regulations require stormwater management and treatment standards for projects that create significant new impervious surface area to help minimize detrimental effects on aquatic species and their associated habitats. These regulations are intended to minimize or mitigate impacts on fish habitat but may not eliminate the impact entirely. The 2019 Stormwater Manual contains explicit and implicit assumptions and caveats that should be considered in the EIS to ensure decision makers have a better understanding of the impacts of stormwater as well as manual limitations. This limitations and caveats are carried forwarded into the 2024 Stormwater Manual. There is no support for a position that flow control duration that limits or prevents channel erosion also directly protects aquatic life. Impacts to aquatic life occur at much lower flow than that will produces adverse effects on aquatic biota.	Comment Noted. Poulsbo is required to utilize the Department of Ecology Stormwater Manual, which is upon adoption, meeting the state requirements for stormwater management. Currently, Poulsbo utilizes the 2019 Stormwater Manual, and evaluates additional impacts on a site specific project application process. Poulsbo is required to adopt the 2024 Ecology Stormwater Management Manual by 2027.																				
6.37	<table border="1" data-bbox="310 1024 1031 1153"> <thead> <tr> <th>Threshold</th> <th>Alternative 1</th> <th>Alternative 2</th> <th>Alternative 3</th> <th>Alternative 4</th> </tr> </thead> <tbody> <tr> <td>Results in a net loss of salmonid habitat needed to protect fish and treaty rights</td> <td>⊗</td> <td>⊗</td> <td>⊗</td> <td>⊗</td> </tr> <tr> <td>Loss of localized critical area functions and values</td> <td>⊕</td> <td>⊕</td> <td>⊗</td> <td>⊗</td> </tr> <tr> <td>Contradicts best available science</td> <td>⊗</td> <td>⊗</td> <td>⊗</td> <td>⊗</td> </tr> </tbody> </table> <p>Potential for Adverse Impacts: No or Low impact ⊗ Moderate impact ⊕ High impact ⊕⊕</p> <p>The conclusions in the first and third rows of “no or low impact” are not supported by BAS. See the “<i>Buffers and Best Available Science</i>” section in the main narrative for more detail.</p>	Threshold	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Results in a net loss of salmonid habitat needed to protect fish and treaty rights	⊗	⊗	⊗	⊗	Loss of localized critical area functions and values	⊕	⊕	⊗	⊗	Contradicts best available science	⊗	⊗	⊗	⊗	Comment Noted. Poulsbo is required to update the CAO as part of the periodic update effort. Evaluation of and inclusion of Best Available Science is a component of the CAO update process. Reviewing new and updated guidance from state resource agencies will occur during the periodic update effort in 2025. No net loss is identified in the following CAO Sections: PMC 16.20.130(7), 16.20.133(4), 16.20.150, 16.20.205(A), 16.20.235(E)(2), 16.20.735(B).
Threshold	Alternative 1	Alternative 2	Alternative 3	Alternative 4																		
Results in a net loss of salmonid habitat needed to protect fish and treaty rights	⊗	⊗	⊗	⊗																		
Loss of localized critical area functions and values	⊕	⊕	⊗	⊗																		
Contradicts best available science	⊗	⊗	⊗	⊗																		
6.38	<i>Policy NE-11.1.</i> Pocket estuaries or streams originating in the City that discharge into pocket estuaries outside of the City should also be considered.	Comment Noted. Consideration of additional language in policy will be considered during final comprehensive plan policy review.																				
6.39	Adopt more protective detention standards that require new development to detain larger volumes of stormwater runoff on-site and in a manner that mimics predeveloped stormwater patterns. There should also be actions to make stream channels more resilient to anthropogenic and climate changes induces alterations of stream flows.	Comment Noted. Poulsbo is required to utilize the Department of Ecology Stormwater Manual, which is upon adoption, meeting the state requirements for stormwater management. Currently, Poulsbo utilizes the 2019 Stormwater Manual, and evaluates additional impacts on a site specific project application process. Poulsbo is required to adopt the 2024 Ecology Stormwater Management Manual by 2027.																				
6.40	Adopt new development requirements that set maximum limits on the percentage of a new development that could be covered with impervious surfaces and that encourage the use of soil amendments to facilitate stormwater infiltration (i.e., low-impact development practices). New development should also be required to quantify loss of infiltration over the typical water year.	Comment Noted. Poulsbo is required to utilize the Department of Ecology Stormwater Manual, which is upon adoption, meeting the state requirements for stormwater management. Currently, Poulsbo utilizes the 2019 Stormwater Manual, and evaluates additional impacts on a site specific project application process. Poulsbo is required to adopt the 2024 Ecology Stormwater Management Manual by 2027.																				

2.3 Draft EIS Clarifications and Corrections

Comments on the [Draft EIS](#), and City and consultant review resulted in minor corrections or clarifications to the environmental analysis in [Draft EIS](#). By section, clarifications and corrections are presented below. The changes clarify the [Draft EIS](#) but do not change conclusions.

Section 2.5 Housing Capacity and Income Analysis, DEIS page 52

In 2021, the Washington Legislature changed the way communities are required to plan for housing. House Bill 1220 amended the Growth Management Act instruct local governments to “plan for and accommodate housing affordable to all economic segments of the population of the state.” These requirements include an inventory and analysis of existing and projected housing needs, including “units for moderate, low, very low and extremely low-income households” as well as “emergency housing, emergency shelters and permanent supportive housing (PSH).

Poulsbo must plan to accommodate 1,977 permanent housing units by 2044. Poulsbo staff followed the Washington State Department of Commerce guidance to conduct a land capacity analysis to determine if there is sufficient capacity to meet future housing needs under current planned zoning and development regulations. This analysis first identifies the net developable acres and planned density in each land use zone to determine total capacity in zone categories. Land use zones, for this analysis, are grouped into the following four categories:

- Low Density: Residential Low
- Moderate Density: Residential Medium
- Low Rise: Residential High. Commercial Zones

The following tables compare the aggregated housing needs of each income level to the total, existing, capacity in each zone category by each of the four Alternatives. Appendix 3 includes detailed distribution by income and zoning district for each alternative.

Alternative 1: Comparison of Projected Housing Needs to Capacity, Current Zoning			
Income Level	Projected Housing Needs	Housing Unit Capacity	Capacity Surplus or Deficit
0-80% AMI and PSH	1,139	476	-663
>80-120% AMI	278	590	312
>120% AMI	560	1,512	952
Total	1,977	2,399 2,578	601

Alternative 2: Comparison of Projected Housing Needs to Capacity, Missing Middle			
Income Level	Projected Housing Needs	Housing Unit Capacity	Capacity Surplus or Deficit
0-80% AMI and PSH	1,139	771	-368
>80-120% AMI	278	453	175
>120% AMI	560	1,425	865
Total	1,977	2,399 2,649	672

Alternative 3: Comparison of Projected Housing Needs to Capacity, SR 305 Corridor Center			
Income Level	Projected Housing Needs	Housing Unit Capacity	Capacity Surplus or Deficit
0-80% AMI and PSH	1,139	1,282	143
>80-120% AMI	278	453	312
>120% AMI	560	1,425	952
Total	1,977	2,399 3,160	1,183

Alternative 4: Comparison of Projected Housing Needs to Capacity, SR 305 Center + RM/RH Increased Density			
Income Level	Projected Housing Needs	Housing Unit Capacity	Capacity Surplus or Deficit
0-80% AMI and PSH	1,139	1,525	386
>80-120% AMI	278	541	263
>120% AMI	560	1,425	865
Total	1,977	2,399 3,491	601 1,514

Section 3.1.1 Earth, Affected Environment, Draft EIS page 60

Erosion & Landslide Hazards Summary

Erosion hazard areas include soils susceptible to severe surface erosion, which can cause downslope movement of silt and sediment. Slopes with minimal vegetation are at an increased risk for erosion hazards. ~~Channel erosion can occur along the banks of streams with steep slopes and high flow velocities. Erosion of stream channels and banks can increase the risk of erosion and landslides.~~

Section 3.1.2 Earth, Impacts, Draft EIS page 63

- An increase in impervious surfaces may typically result in changes to surface water and ground water quality and quantity.

Section 3.2.2 Air Quality Impacts, Draft EIS pages 20 and 71

Wildfire Smoke

Under all the alternatives, wildfire smoke would continue to be a concern. As stated in Section 3.1.2.1, Affected Environment, there have been days with moderate and poor air quality in recent years, which is connected to the rise in the number of wildfires in the region, and the smoke and particulate matter they produce. It is important to note that the City has no control over wildfires originating outside of the city or county, which frequently has an impact on the air quality within Kitsap County.

Section 3.2.3 Air Quality Mitigations, Draft EIS pages 21 and 72

Local Mitigation Measures

At the local level, mitigating measures include: 1) Construction impacts may be reduced with the requirement for dust suppression in the forms of containment via suspended plastic sheeting, watering dry dirt roads and work areas, and suspending work during windy or extremely dry periods; 2) Encourage home heating with wood burning appliances to optimize energy efficiency and cleanliness. Prohibition of wood burning appliances in high-density areas may be appropriate; 3) Zoning regulations that encourage mixed-use pedestrian and transit-oriented neighborhoods may help reduce reliance on vehicles; 4) Transportation Demand Management (TDM) strategies promoting multi-modal and alternative transportation options, such as walking, bicycling, riding transit, carpooling, and working from home can be implemented to enhance the capacity of the transportation network and reduce vehicle emissions; 5) Consider disallowing use of methane in new construction; 6) Consider banning of use of personal fireworks within city limits.

Section 3.3.1 Water Resources, Affected Environment, Liberty Bay Watershed, Draft EIS pages 75-76

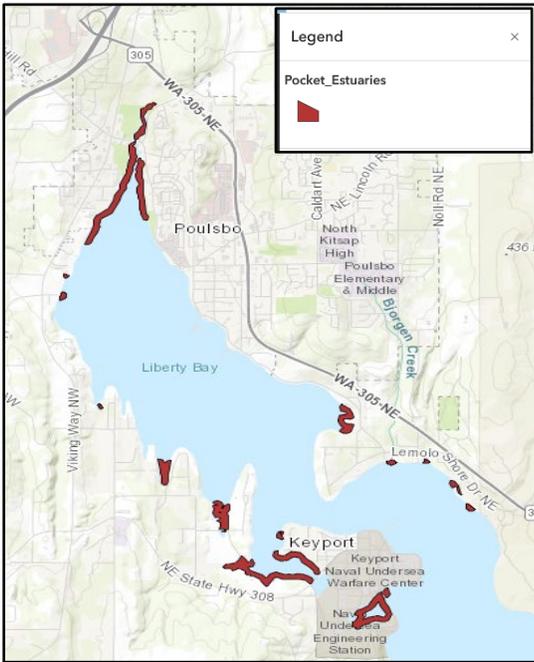
The source of Exhibit 3.3.1-1 is the City's TMDL Implementation Plan, Figure ES-1, page ES-3. Scale of map in plan is larger and stream names can be reviewed.

Section 3.3.1 Water Resources, Affected Environment, Streams, Draft EIS page 78

Add the following to the Affected Environment Streams Section:

Several pocket estuaries associated with Liberty Bay, Dogfish Creek, Bjorgen Creek and Johnson Creek within the city limits and are identified in Exhibit 3.3.1-3a. Pocket estuaries are smaller, tidally influenced estuaries that are usually sheltered from strong wave action, often found at stream mouths, are important areas for juvenile salmonids to feed, grow and prepare for migration to open waters.

Exhibit 3.3.1-3.a: Mapped Pocket Estuaries of Liberty Bay

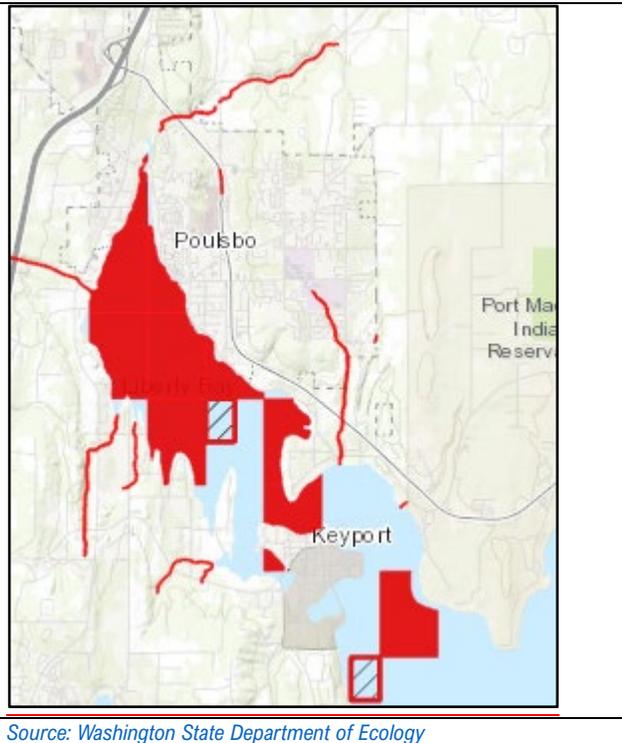


Source: NOAA

Section 3.3.1 Affected Environment, Water Quality, Draft EIS page 83

The federal [Clean Water Act](#) requires that all states restore their water bodies to be “fishable and swimmable.” Section 303(d) of the Clean Water Act establishes a process to identify and clean up polluted water. Those waters we determine to be impaired are placed on the “303(d) list” and are prioritized for future clean up. The City’s [Total Maximum Daily Load \(TMDL\) Implementation Plan](#) is in effect and addresses Liberty Bay’s water quality and actions for improvement.

Exhibit 3.3.1-6a: Liberty Bay 303d Water Quality Map



Source: Washington State Department of Ecology

Section 3.3.2 Water Resources, Impacts, Draft EIS page 83

Impacts Common to All Alternatives

Streams, wetlands, frequently flooded areas, and critical aquifer recharge areas are located throughout the city, and all alternatives could have impact on these resources if development occurs in proximity to these resources. The development growth associated with every alternative **would will** likely result in increased hard surfaces, increased vehicle use, and decreased vegetation, all of which can negatively impact surface water resources **and groundwater recharge**. Also, impaired water exists throughout the city and future development or redevelopment around impaired waters could provide an opportunity to improve water quality through improved stormwater treatment compared to what currently exists. Finally, construction activities associated with development and redevelopment can involve removal of vegetation and soil disturbance, causing potential erosion and water quality impacts.

Section 3.4.2 Fish, Wildlife, Plants, Impacts, Draft EIS page 90

Impacts Common to All Alternatives

Population growth and associated urbanization impacts to fish and wildlife habitat conservation areas are **will likely occur** under all alternatives. The extent of impacts to fish, wildlife, and plants will depend on the actual location and intensity of development, habitat size, and connectivity across the landscape. Impacts to streams, wetlands, groundwater, floodplains, and native vegetation detailed in the water resources section also apply to fish and wildlife habitat conservation areas. This includes increased sedimentation and pollutants in runoff to streams and wetlands and decreases in native vegetation. Additionally, disruptions in seasonal hydrologic cycles, vegetation losses, reduced summer stream flows, increased stream temperatures, and reduced stream bank stability are all anticipated as a result of climate change. Stressors associated with climate change are projected to significantly impact fish and wildlife species, including Chinook, coho salmon, steelhead and bull trout, and amphibians.

Priority Habitats and Species

Increased intensification throughout the city under all alternatives is expected to decrease urban wildlife habitat. The loss of habitat may lead to wildlife species utilizing an unsuitable or less suitable habitat compared to existing conditions. Conversion of currently undeveloped properties could lead to fragmentation of wildlife habitat and may reduce connectivity.

Increased stormwater runoff from new impervious surface areas and roadways **may will likely** result in increased contaminants. Reduction in habitat functions and values may occur due to increased human disturbance. Species diversity may be affected by increasing populations of species that are adapted to human presence, particularly in areas with increased noise and light. Development activities or associated landscaping may cause the introduction of nonnative plant species to occur. All the above factors may lead to reduced quantity and quality of wildlife habitat.

Aquatic species **may will likely** be impacted by loss of habitat due to development or alteration of habitat due to changes in water quality and quantity that may occur under each alternative.

Section 3.8.3 Transportation, Other Mitigation Measures, Draft EIS page 157

3.8.3 Other Mitigation Measures

- Partner with Kitsap Transit to provide multi-modal and public transportation opportunities throughout the city and UGA.
- Collaborate with WSDOT to plan for and address anticipated LOS at SR 305 intersections.
- Seek available transportation grant funding, collect impact fees, and identify new funding sources to support identified necessary transportation system improvements.
- Continue implementing the recommendations from the Poulsbo Traffic Demand Management Study.
- Relax transportation level of service standards.
- **To promote active transportation, add bicycle racks throughout the city. Creative rack designs can double as public art.**

Section 3.11 Utilities

3.11.12 Impacts Under Alternatives – Water, Draft EIS pages 181-182

All alternatives fit within the water system 2044 analysis and increases to water demand are expected to be covered by the City's existing water rights and system, agreement with Kitsap Public Utilities District and identified **water conservation and** capital improvement projects as presented and analyzed in the 2024 Water System Plan Update. All developments may require developer-financed improvements to the water system serving that development. These improvements will be

constructed concurrently with the development. Some projects to serve the additional growth may benefit a larger area and several future projects. The projects that benefit a larger area may need to be constructed with latecomers or other reimbursement agreements for future development. The 2024 Water System Plan analyzes Growth Alternative #4 (highest growth alternative) and provides a comparison to Alternative #1 in Exhibit 3.11.2-1. Since Alternative #4 provides the highest growth potential it was used for all projections and analysis in the Water System Plan Update to be conservative.

Section 3.11.3 Mitigation Measures, Water, [Draft EIS page 186](#)

- **Water:** By 2044, the total annual water use is projected to be ~~1,974~~ 1,270 acre-feet/year, a ~~50~~ 30 percent increase from current usage (~~1,291 acre-feet/year~~). ~~By the end of the 20-year planning period in 2044, usage is projected to increase to 1,612 acre-feet/year.~~ These projections do not include reductions in water use created by increased conservation and water use efficiency measures underway and planned by the City. The City holds water rights for a total of 1,893 acre-feet/year. Projected daily demand exceeds annual water by 2040; however, the City can meet average day demand by implementing partially or fully the water efficiency goals established in the City's 2024 Water System Plan. Therefore, it is not expected that the City will need additional instantaneous or annual water rights within the 20-year planning period. Instantaneous withdrawal water rights 2044 demand is projected at 2,570 gpm, and the City holds an instantaneous water right of 3,119 gpm. Exhibit 3.11.3-1 outlines the City's water system short- and long-term capital projects identified to meet the level of service standard.

Section 3.11.3 Other Potential Mitigation Measures, [Draft EIS page 190](#)

- Continue to update its water, sewer, and stormwater system plans at a minimum of every six years to ensure it is meeting the short-term and long-term capacity needs of the city, as well as applicable state agency requirements.
- Review construction standards regularly to ensure the City's standards are current and relevant to the changing needs of the city.
- Develop and implement proactive water conservation and education program.
- Continue inflow and infiltration evaluations of the City's sewer system.
- Continue to coordinate with Kitsap County Public Works to ensure there is adequate capacity at the Central Kitsap Wastewater Treatment Plan.
- Incorporate LID standards and techniques for storm water management should be incorporated wherever possible to aid in the reduction of storm water impacts.
- Regional detention and water quality facilities should be used wherever feasible to provide economies in space.
- To the extent that is financially possible, existing storm water systems should be retrofitted with Best Management Practices (BMPs) that reduce pollutant loading.
- To mitigate increased solid waste generation, consider curbside pickup of organic materials to encourage food and yard waste composting.

Chapter 3.0 | Map and Code Amendments



3.1 Land Use Map and Poulsbo Municipal Code Identified Amendments

Exhibit 3.2-1 Preferred Alternative Development Regulation Update		
Land Use Map	Summary of Map Amendments 2024-2025	Updates to Map with Comprehensive Plan Adoption
Medium Density Zoned Parcels		No change to the map, change to density in legend from 6-10 DU/A to 6-14 DU/A.
High Density Zoned Parcels		No change to the map, change to density in legend from 11-14 DU/A to 15-22 DU/A.
Manufactured Home Park Overlay		Establish Manufactured Home Park Overlay to promote the retention of manufactured home parks as a source of affordable detached single-family and senior housing.
Municipal Code Section	Summary of Code Updates 2024-2025	Updates to Code Proposals 2025-2026
Chapter 17.65 (new)	Unit Lot Subdivision Interim Ordinance (Ord. 2024-03)	Unit Lot Subdivision Ordinance Permanent Adoption
18.40.030, 18.70.030, 18.70.070, 18.70.080, 18.80.030, 18.80.080, 18.80.100, 18.80.110	Added “emergency housing,” “emergency shelter,” “permanent supportive housing,” and “transitional housing” definitions, uses permitted, and spacing requirements. (Ord. 2024-05)	
18.40.030, 18.70.030, 18.70.070, 18.70.080, 19.20.010	Updates to Accessory Dwelling Units: permitted with building permit only, two allowed per lot, 1,000 SF maximum size (from 800 SF), and conversion of existing non-conforming structures to ADU. (Ord. 2024-05)	Allow 2 ADUs per “primary residence” instead of per “lot”.
18.40.030, 18.70.020, 18.70.070	Permitted “duplex on corner lot” in RL, RM, and RH zoning districts. (Ord. 2024-05)	Duplex located on a corner lot shall not be considered two separate dwelling units for density calculations, development standards, such as minimum lot size, setbacks, lot coverage, building height, shall be applied to the entirety of the building, not the individual duplex units, and duplexes developed under this provision may be subdivided into two fee-simple lots using a unit lot subdivision process.
18.70.060	Eliminated minimum lot depth requirements. (Ord. 2024-05)	Height incentive for pitched rooflines in the RM and RH zoning districts.
18.260.040, 18.260.050, 18.260.050, 18.260.080	Updated Planned Residential Development (PRD) minimum size from 5 acres to 3 acres. Increased attached units in PRDs from 4 attached to 6. (Ord. 2024-05)	Updates to “Individual Identity” associated with residential units in PRDs. Density bonus/incentives for attached units in PRDs.
18.80.020, 18.80.030, 18.80.040, 18.80.110, and 18.250	In the C-4 Commercial Zoning District (Ord. 2024-09): <ul style="list-style-type: none"> Permitted “planned mixed use development.” Change lot coverage from 50% to 60%, or 80% if at least 50% of the required parking is under the building. Change the height limit from 35 feet to 45 and 55 feet in specific areas. Parking requirement for “medical/dental office or clinic” from 1 space/200 GSF to 1 space/300 GSF. Parking for 2 or more bedrooms changed from 2 space/dwelling unit to 1.5 spaces/dwelling unit. 	
18.80.020, 18.80.030, 18.80.040, and 18.80.080	In the C-3 Commercial Zoning District (Ord. 2024-10): <ul style="list-style-type: none"> Change lot coverage from 50% to 60%, or 80% if at least 50% of the required parking is under the building. Change the height limit from 35 feet to 45 and 55 feet in specific areas. 	Parking reduction within a certain distance of SR 305
18.80.040, 18.80.070	In the C-2 Commercial Zoning District (Ord. 2024-13): <ul style="list-style-type: none"> Building lot coverage increased from 70% to 80%. Height increased from 40 feet to 55 feet. Side setback may be reduced to zero, except when adjacent to R zone shall be 15 feet. Updates to design standards. 	
18.80.080	Commercial Flex Space (Ordinance 2024-17). Allow for flex space in all four commercial zones, but outside of the Shopfront Overlay in the C1 zoning district.	
18.70.040		Increase densities in RM and RH zoning districts
Chapter 18.115 (new)		Establish Manufactured Home Park Overlay to promote the retention of manufactured home parks as a source of affordable detached single-family and senior housing.
18.140.040		Decrease standard parking stall width.
18.140.090 (new)		Allow off-street parking reduction through submittal and review of parking study.
Chapter 17.40		Amend to permit short plats of up to 9 lots – currently 4 lots.

Chapter 4.0 | Appendix

4.1 Marked Comment Letters