



Appendix G – Evaluation Criteria and Priority Changes

On December 14, 2022 Planning Staff provided a list of proposed code changes for the Planning Commission to discuss and prioritize. The following information is a revision of that list incorporating those priorities and what staff has deemed can be feasibly accomplished by the March 31, 2023 deadline. This deadline has been imposed by the Building Residential Capacity legislation of the Growth Management Act ([RCW 36.70A.600](#)). During the December 14 Planning Commission meeting consensus was given that reducing the barriers to ADU development was a top priority. There was less consensus on residential uses on the first floor of commercial structures, so staff wanted to present what zoning standards might be used to ensure compatibility with the zone.

Staff has placed all the suggested code Title 17 code amendments into four priority categories for code change considerations:

Priority, Significant: Planning Commission priorities that will require major changes to code that may include new code sections, increased complexity, design standards, or require evaluation of the changes to ensure there is no cascading “domino” effect, or conflict/connection across multiple sections, chapters, or even titles of the municipal code.

Priority, Minor: Planning Commission priorities that provide support for multiple evaluation criteria but may not result in municipal code changes staff considers difficult to insert, edit, or draft. These changes likely have minimal “domino” effects.

Housing Keeping: Changes identified by staff that have made code interpretation difficult or created confusion for the public. These changes are generally minor in nature and have little “domino” effect. Their priority may be less high on the Planning Commission’s scope, but they are related to pursuing housing for all.

Priority, Out of Scope: Changes related to pursuing housing for all that were seen as important for the City to review and institute in the future, but were out of scope of this code amendment exercise.

The proposed changes are provided individually within six categories. These categories define either how the existing code is a barrier to housing development, an opportunity to provide greater development flexibility, increase housing density, decrease unnecessary financial burden of existing and developed housing, or ensure housing for all community members.

Code as a Barrier to Affordable Housing Development ■

A major focus of this code revision exercise is to identify where the City’s zoning and building code continues to act as a barrier to the development of affordable and attainable housing. Changes identified under this criterion have been identified as barriers. The goal is to remove these barriers from code while ensuring consistency in regulations remains across individual Titles and Sections.

Increasing Flexibility in Zoning Code Provisions ■

Since 2017 the City of Port Angeles has continued to provide more flexibility in residential uses allowed in residentially focused zones and commercially mixed-use focused zones. This flexibility includes the use itself (whether now allowed outright or by condition) and how the use performs on the site through design standards of setback, height, and bulk standards (how development interacts with adjacent property and the street). Examples of this include allowing duplexes by right and accessory dwelling units as an accessory use in every residentially focused zone and reducing lot size requirements in certain zones.

Increasing Housing Density Availability ■

Housing density has historically been the most significant control segregating districts of residential development. Increasing housing density allows for more affordable and equity housing availability across the community. Zoning is a tool to ensure incompatible uses do not create undue nuisance, burdens, or health impacts to surrounding property owners. Best available science and practice has recently shown that this frame of thought has created a pattern of development across the United States inhibiting affordable residential development, especially “missing-middle” housing that has the ability to easily integrate into historically low-density residential development. The BRC is particularly framed to provide a means to develop missing middle housing and integrate housing density as infill development into existing low density residential zones

Reducing the Potential Cost of Development ■

Development cost not only includes the cost of labor and materials. Cost can also be attributed to the amount of time the development process takes to navigate from property acquisition to an occupiable structure; the required infrastructural improvements required to ensure adequate services and safe occupancy; and restrictive design standards imposed by municipal codes. Municipal codes should not impose a barrier that drives housing costs up in order to cover the cost of development. Streamlining permitting, imposing infrastructural alternatives, and strategically relaxing some design standards are all some ways that municipal codes can assist in reducing housing costs.

Ensuring Housing Equity and Availability ■

Housing is a human right. In order to appropriately ensure housing for all members of the community, municipal code should adequately address the needs of everyone. Best available science and practice has recognized the faults in requiring strict segregation of certain housing types that can otherwise be reasonably located adjacent to each other. All community members deserve to have access to housing that meets their specific needs at any and all stages in their life. Successfully employed municipal code should act as the framework providing diverse housing construction to support and encourage the realization of this right for everyone.

Enabling Local Property Development Through Self Reliance ■

By amending Title 17 to be more easily read and understood, local property owners will more readily understand development requirements and make choices to maximize the use of their property.

Prioritize List of Draft Code Changes

Priority, Significant:

1. *Creation of temporary housing section of Title 17 with design standards and timelines that also addresses RV's* ■■■■

The City Council tasked staff and the Planning Commission to develop code to provide City residents the means to create safe temporary housing for all. This includes a permitting process and any standards and requirements to address life/safety issues. The Planning Commission additionally expressed interest in revisiting the proposal to allow a codified permitting process for recreational vehicles on axels to be consider as temporary housing on private property.

2. *Allow for alley/street lot subdivision in areas on property with appropriate existing or updated street standards.* ■■■■

Many properties in Port Angeles were developed prior to modern setback standards that restrict the location of the residence towards the center of a building site. Many of these properties are also within the City's original townsite plat where access to a street and alley are both available. Permitting of an interior lot with street and alley access to subdivide perpendicular to those accesses will allow another means for property owners with historic residences in the far front or rear of the lot to subdivide and develop a new primary residence. Setback standards and frontage definitions will also be evaluated to ensure any subdivision proposal is not disruptive to surrounding neighbors

3. *Allow for commercial to residential conversion with design considerations – specific to CBD to allow for residential on ground floor.* ■■■■

Ground floor residential development is currently only available in the rear of a structure within the CBD zone. Vacant storefronts might be used as or converted into housing units as the market allows—either in the interim or permanently—with appropriate design considerations to ensure future inhabitants have adequate privacy and the adjacent streetscape is not disrupted.

4. *Allow 1 unit per 1,750 sf in the R7 zone.* ■■■■

This change will allow 4 separate primary units on a standard 7000 sf lot, a change that opens the opportunity for a property owner to acquire a multifamily tax exemption. Standards will ensure harmony for surrounding neighboring properties and within a block.

5. *Enable a City-led development authority/land bank (Transfer of Development Rights)* ■

Municipal land banks are typically tasked with addressing issues related to vacant, abandoned and tax-delinquent real property. This includes, but is not limited to, the purchase, rehabilitation, improvement, or sale of properties for the purpose of eliminating blight and returning those properties to productive use. The creation of a municipal land bank would allow for a more direct method of addressing these issues than what is currently feasible as well as aid the City in facilitating future targeted economic development. Similarly, Port Angeles may form a Public Development Authority (PDA) focused on real estate development and management. While these PDAs are typically focused on a singular public development, a broader scope of focus could be possible.

Priority, Minor:

1. *Reevaluate and revise each residential zone's purpose statement to reflect the changes provided in the BRC process.* ■■■

The changes that are being proposed run counter to the R7 zone's current stated purpose. The zone's purpose will change to reflect the availability of a number of mixed middle housing types that will now be available through several amendments in the code section.

2. *Allow a detached ADU to be constructed accessory to a duplex on one lot in all residential zones where duplexes are allowed by right.* ■■■■

ADU's are an attainable way for a property owner to create affordable housing options in Port Angeles. With soon-to-be developed permit ready ADU plans being made available by the City of Port Angeles, allowing them accessory to all primary housing types will reduce the barrier to their construction and increase affordable housing options.

3. *Eliminate bedroom requirements for ADUs* ■■■

Size restriction is enough of a design consideration and control for ADU's to remain subordinate to its primary residence. An increase in the number of bedrooms allows for potentially larger households to occupy an ADU residence.

4. *Incentivize Multifamily Development through a direct subsidy generated from a "Huge House" (greater than 3,000 sq. ft.) construction fee.* ■■

[A recent article by The New York Times](#) highlighted the national decline of the "starter home" (homes typically at or below 1400 sq.ft.). Simultaneously, while homes have on average become larger, household sizes became smaller. A fee targeted at single household dwellings significantly above the average size of Port Angeles homes could help slow this trend while generating funding that would directly support the creation of multi-family units. Multi-family units will play an increasing important role in providing affordable and equitable access to housing in our community as the cost of development and redevelopment rises. The "Huge House" fee as proposed would function similarly to what other jurisdictions call an Affordable Housing Mitigation Fee.

5. *Remove maximum per unit requirements for cottage housing developments.* ■■■■

Per unit requirements for cottage housing can be seen as a barrier to housing unit development. Removing this barrier will allow a developer to determine the residential density of their proposal based upon the design standards for cottage housing development. The change allows for creative design within the means of the existing standards. This change does not affect minimum unit per lot development requirements

6. *Allowed dwelling types – if building meets IBC standards per WA state, allow it on any property if the design meets infill development standards.* ■■■■

Manufactured homes are an affordable residence type regulated by Washington State Labor and Industries. Double-wide manufactured homes measuring 24X36 sf are the only manufacture housing type allowed in any zone not RTP, Residential Trailer Park zone. There is a social stigma against "single-

wide” trailers, and this type of housing is only found as an allowed use in the RTP, Residential Trailer Park zone. The hesitance to allow smaller manufactured housing has to do with its historic design: the height and roofline of the structure, the finished siding materials, the orientation of the door to the street, and the overall number of windows and transparency. But, staff has found that there are manufactured home builders that are producing affordable housing units that do not abide by the stigmas mentioned above. This code change will require the correct licensing from the state that ensures the structure meets all life/safety requirements of the International Building Code and International Residential Code, and it could require some infill residential design standards to ensure correct building and front door orientation, transparency, and screening from adjacent properties.

Housekeeping:

The following proposal are directly related to consistency and clarification of the zoning code:

1. Replace “single-family with “single-household” to provide inclusivity and equity in Title 17 ■
2. Reestablish consistency among all zone titles (“RS-7” replaced with “R7”) ■
3. The lower residential zones removed the “S” in 20XX. This housekeeping item will ensure this change is reflected throughout the entire title.
4. Add definitions in multiple places to ensure people find term they are looking for. E.g. *SEE* _____ ■
5. Identify inconsistency between PAMC titles ■
6. Refine use charts to avoid conflicts ■
7. Define “public” in Title 17 so use of terms such as “public buildings” in Section 17.22.110 are clear and consistently applied. ■

The following proposals are directly related to situations where code has created a barrier to developing housing units:

8. Allow for conversion of accessory structures to housing units in all residential zones regardless of conformity to zoning standards. ■■■■■■
9. Exempt apartments above businesses from residential density requirements ■■■■■■
10. Allow preexisting single-household dwelling as allowed use in all zones. ■■■■■■
11. Define “apartment” and add as permitted use in all commercial zones. ■■■■■■

The following proposals are in direct response to practical use and intent of the form-based code changes of Chapter 17.22:

12. Reevaluate landscaped block frontage standards to required minimum frontage distances. ■■■
13. Parking standards – sequential spaces and landscaping. Location of parking. ■■
14. Allowance of deviations from design standards for existing historically significant structures. ■■

Priority, Out of Scope:

1. *Codify pre-application requests with a firm timeline and deliverable date.* ■
Preapplication Meeting Requests do not currently have a codified process that provides predictability

and guidance to applicants looking to submit an application. This process has been identified as a potential future change due to the consolidated development permit process chapter existing in Title 18 and a cost of services analysis currently taking place that will not be completed until after this amendment is proposed to be adopted.

2. *Create Maximum lot sizes in R11 and R9 zones to prevent large lot subdivisions or require a restriction on the plat requiring future subdivision to be at a minimum density.* ■■■

This code change would prevent single residential units on large lots from being carved out, leaving the large lot open to potential development without future subdivision being possible. This can be due to the frontage available, siting of a future residence, or lack of proper access and utility easements. Large lots are increasingly scarce in Port Angeles, but this process should include a more robust review with the inclusion of a change in subdivision standards in Title 16 PAMC.

3. *Define and allow “corner shop mixed-use structure” on strategic residential intersections.* ■■■■ This code change will require analysis that identifies appropriate intersections for this type of development. The Planning Commission also found that the City should make its focus neighborhood centers and corridors and the downtown for commercial development before expanding the availability of commercial development to traditionally residential-focused zones.