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BEFORE THE GROWTH MANAGEMENT HEARINGS BOARD  
WESTERN WASHINGTON REGION  
STATE OF WASHINGTON

TODD MCGUIRE, an individual; MARY MCCURDY, an individual; JOHN CAPPS, an individual; JOHN WATTS, an individual; and AFFORDABLE HOMETOWN PORT TOWNSEND, a non-profit organization.

No.

**PETITION FOR REVIEW**

Petitioners,

v.

CITY OF PORT TOWNSEND,

Respondent.

**PETITIONERS**

The mailing address, telephone number, and emails of the Petitioners are:

Affordable Hometown Port Townsend  
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Port Townsend, WA 98368  
info@affordablehometownpt.org

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Port Townsend, WA 98368  
206-430-2343  
ToddMcGuire@affordablehometownpt.org

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Mary McCurdy  
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John Watts  
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360-774-3100  
JohnWatts@affordablehometownpt.org.

For purposes of this action all correspondence and pleadings shall be served upon the following attorneys for the Petitioners:

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**ACTION FOR WHICH REVIEW IS SOUGHT**

On December 15, 2025, the City of Port Townsend approved Ordinance No. 3361, relating to comprehensive planning; adopting the 2025 Growth Management Act periodic update to the Comprehensive Plan; amending the Comprehensive Plan; adopting an active transportation plan, and amending titles 2, 12, 17, 18, and 20 of the Port Townsend Municipal Code. A true and correct copy of Ordinance No. 3361 is attached to or enclosed with this Petition for Review.

1 On December 24, 2025, the City published legal notice of the adoption of Ordinance No.  
2 3361 in the Port Townsend and Jefferson County Leader.

3 **ISSUES PRESENTED FOR REVIEW**

4  
5 1. Did the adoption of Ordinance No. 3361, the City of Port Townsend Comprehensive  
6 Plan Housing Element, fail to demonstrate sufficient capacity of land for housing including housing  
7 for moderate, low, and extremely low-income households, while also balancing the need to  
8 preserve existing housing stock, in violation of RCW 36.70A.070(2)(c), RCW 36.70A.115, RCW  
9 36.70A.020(1), (4), (5), (10), (12), RCW 36.70A.120, RCW 36.70A.130(1) and (5)(b), RCW  
10 36.70A.210, RCW 36.70A.100, and Jefferson County Countywide Planning Policies (CPPs) #6  
11 and #9?

12  
13 2. Did the adoption of Ordinance No. 3361, the City of Port Townsend Comprehensive  
14 Plan Housing Element, fail to make adequate provisions for existing and projected needs of all  
15 economic segments of the community, fail to incorporate consideration for low, very low,  
16 extremely low, and moderate-income households, and fail to document programs and actions  
17 needed to achieve housing availability and affordable housing needs, including gaps in local  
18 funding in violation of RCW 36.70A.070(2)(d), RCW 36.70A.020(4), (5), RCW 36.70A.120,  
19 RCW 36.70A.210, RCW 36.70A.100, and Jefferson County CPPs #6 and #9?

20  
21 3. Did the adoption of Ordinance No. 3361, the City of Port Townsend Comprehensive  
22 Plan Housing Element, fail to identify local policies and regulations that result in racially disparate  
23 impacts, displacement, and exclusion in housing in violation of RCW 36.70A.070(2)(e), RCW  
24 36.70A.020(4), RCW 36.70A.120, RCW 36.70A.210, RCW 36.70A.100, and Jefferson County  
25 CPP #6?

1           4.       Did the adoption of Ordinance No. 3361, the City of Port Townsend Comprehensive  
2 Plan Housing Element, fail to identify and implement policies and regulations to address and begin  
3 to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies,  
4 plans, and actions, in violation of RCW 36.70A.070(2)(f), RCW 36.70A.020(4), (5), RCW  
5 36.70A.120, RCW 36.70A.210, RCW 36.70A.100, and Jefferson County CPP #6?  
6

7           5.       Did the adoption of Ordinance No. 3361, the City of Port Townsend Comprehensive  
8 Plan Housing Element, fail to identify areas that may be at higher risk of displacement from market  
9 forces associated with changes to zoning development regulations, in violation of RCW  
10 36.70A.070(2)(g), RCW 36.70A.020(4), (5), RCW 36.70A.120, RCW 36.70A.210, RCW  
11 36.70A.100, and Jefferson County CPP #6?  
12

13           6.       Did the adoption of Ordinance No. 3361, the City of Port Townsend Comprehensive  
14 Plan Housing Element, fail to establish anti-displacement policies with consideration given to the  
15 preservation of historical and cultural communities as well as to the investments in low, very low,  
16 extremely low, and moderate-income housing, equitable development initiatives, inclusionary  
17 zoning, community planning requirements, land disposition policies, and consideration of land that  
18 may be used for affordable housing, in violation of RCW 36.70A.070(2)(h), RCW 36.70A.020(4),  
19 (5), RCW 36.70A.120, RCW 36.70A.210, RCW 36.70A.100, and Jefferson County CPP #6?  
20

21           7.       Does the adoption of Ordinance No. 3361, the City of Port Townsend  
22 Comprehensive Plan Capital Facilities Element, fail to demonstrate financial feasibility and  
23 funding sources for infrastructure needed to serve forecasted growth, in violation of RCW  
24 36.70A.070(3), RCW 36.70A.020(1), (12), RCW 36.70A.120, RCW 36.70A.210, RCW  
25 36.70A.100, and Jefferson County CPP #9?  
26

1           8.       Does the adoption of Ordinance No. 3361, the City of Port Townsend  
2 Comprehensive Plan Transportation Element, fail to ensure that level of service standard  
3 amendments were made concurrent with strategies to accommodate the impacts of development,  
4 in violation of RCW 36.70A.070(6)(b) and RCW 36.70A.120?  
5

6           9.       Does the adoption of Ordinance No. 3361, the City of Port Townsend  
7 Comprehensive Plan Capital Facilities and Transportation Elements, authorize development  
8 without ensuring that public facilities, services, and utilities will be adequate to support  
9 development at the time development is available for occupancy and use without decreasing levels  
10 of service below the minimum standards, in violation of and RCW 36.70A.020(1), (4), (10), (12),  
11 RCW 36.70A.070(4)(a), RCW 36.70A.120, RCW 36.70A.210, RCW 36.70A.100, and Jefferson  
12 County CPP #9?  
13

14           10.      Does the adoption of Ordinance No. 3361, the City of Port Townsend  
15 Comprehensive Plan Transportation Element, fail to identify transportation facility and service  
16 needs in accordance with RCW 36.70A.070(6)(a)(i) through (iii), RCW 36.70A.070(12), and RCW  
17 36.70A.120, including specific actions and requirements for bringing into compliance  
18 transportation facilities or services that are below the City's established level of service standards?  
19

20           11.      Does the adoption of Ordinance No. 3361, the City of Port Townsend  
21 Comprehensive Plan Transportation Element, fail to include a financing plan based on the needs  
22 identified in the comprehensive plan, fail to discuss how land use assumptions will be reassessed  
23 to ensure that level of service standards will be met, and fail to include demand management  
24 strategies, in violation of RCW 36.70A.070(6)(a)(iv)–(vii), RCW 36.70A.120, and RCW  
25 36.70A.020(1), (12)?  
26

1 12. Does the adoption of Ordinance No. 3361, the City of Port Townsend  
2 Comprehensive Plan violate the Growth Management Act's concurrency requirements under RCW  
3 36.70A.070(6)(b), RCW 36.70A.108, RCW 36.70A.630(4), RCW 36.70A.120?

4 13. Did the City of Port Townsend fail to provide early, continuous, and meaningful  
5 public participation in its adoption of Ordinance No. 3361, City of Port Townsend Comprehensive  
6 Plan and development regulations, in violation of RCW 36.70A.140 and RCW 36.70A.020(11)?

### 8 **STANDING**

9 1. Petitioner Todd McGuire resides in the City of Port Townsend in an area that will  
10 be impacted by the revised development regulations, and Mr. McGuire will be adversely affected  
11 by the increased density and intensity of use allowed thereby as well as the City's failure to meet  
12 its obligations related to addressing affordable housing, anti-displacement policies, racially  
13 disparate impacts, and insufficient infrastructure, public facilities and services. Mr. McGuire timely  
14 participated in the City's public process for the 2025 Comprehensive Plan update by submitting  
15 written comments concerning matters at issue in this petition. Petitioner therefore asserts that he  
16 has standing to challenge the actions at issue under RCW 36.70A.280.

17 2. Petitioner Mary McCurdy resides in the City of Port Townsend in an area that will  
18 be impacted by the revised development regulations, and Ms. McCurdy will be adversely affected  
19 by the increased density and intensity of use allowed thereby as well as the City's failure to meet  
20 its obligations related to addressing affordable housing, anti-displacement policies, racially  
21 disparate impacts, and insufficient infrastructure, public facilities and services. Ms. McCurdy  
22 timely participated in the City's public process for the 2025 Comprehensive Plan update by  
23 submitting written comments concerning matters at issue in this petition. Petitioner therefore  
24 asserts that she has standing to challenge the actions at issue under RCW 36.70A.280.  
25  
26

1           3.       Petitioner John Capps resides in the City of Port Townsend in an area that will be  
2 impacted by the revised development regulations, and Mr. Capps will be adversely affected by the  
3 increased density and intensity of use allowed thereby as well as the City’s failure to meet its  
4 obligations related to addressing affordable housing, anti-displacement policies, racially disparate  
5 impacts, and insufficient infrastructure, public facilities and services. Mr. Capps timely participated  
6 in the City’s public process for the 2025 Comprehensive Plan update by submitting written  
7 comments concerning matters at issue in this petition. Petitioner therefore asserts that he has  
8 standing to challenge the actions at issue under RCW 36.70A.280.  
9

10           4.       Petitioner John Watts resides in the City of Port Townsend in an area that will be  
11 impacted by the revised development regulations, and Mr. Watts will be adversely affected by the  
12 increased density and intensity of use allowed thereby as well as the City’s failure to meet its  
13 obligations related to addressing affordable housing, anti-displacement policies, racially disparate  
14 impacts, and insufficient infrastructure, public facilities and services. Mr. Watts timely participated  
15 in the City’s public process for the 2025 Comprehensive Plan update by submitting written  
16 comments concerning matters at issue in this petition. Petitioner therefore asserts that he has  
17 standing to challenge the actions at issue under RCW 36.70A.280.  
18

19           5.       Petitioner Affordable Hometown Port Townsend is a Washington non-profit  
20 organization that works to support the growth of affordable, workforce and middle-income  
21 housing while minimizing negative impacts on existing Port Townsend neighborhoods  
22

23           6.       Affordable Hometown Port Townsend members, including the four individual  
24 petitioners named herein, participated in the public process by commenting to the City  
25 concerning all matters at issue in this petition. Affordable Hometown Port Townsend has  
26 participation standing to challenge the actions at issue pursuant to RCW 36.70A.280.

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**ESTIMATED LENGTH OF HEARING**

The Petitioners estimate that the Hearing on the Merits for this matter will last approximately four hours.

**RELIEF SOUGHT**

The Petitioners respectfully request that the Board find that Ordinance No. 3361 fails to comply with the goals and requirements of the Growth Management Act and requests that the Board remand the matter back to the City of Port Townsend for action that is compliant with the Growth Management Act.

The Petitioners have read this Petition for Review and believe the contents to be true.

Dated this 20th day of February, 2026.

Respectfully submitted,

TELEGIN LAW PLLC

By:   
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*Attorneys for Petitioners*

**Ordinance No. 3361**

**AN ORDINANCE OF THE CITY OF PORT TOWNSEND, WASHINGTON, RELATING TO COMPREHENSIVE PLANNING; ADOPTING THE 2025 GMA PERIODIC UPDATE TO THE COMPREHENSIVE PLAN; AMENDING THE COMPREHENSIVE PLAN; ADOPTING AN ACTIVE TRANSPORTATION PLAN, AND AMENDING TITLES 2, 12, 17, 18. AND 20 OF THE PORT TOWNSEND MUNICIPAL CODE IN CONNECTION THEREWITH**

**WHEREAS**, The City of Port Townsend ("City") has adopted a Comprehensive Plan as required in Chapter [36.70](#) RCW, with the following adoption history:

1. After extensive public review and a recommendation from the Port Townsend Planning Commission (the "Planning Commission"), the City's current Comprehensive Plan (the "Plan") was adopted by the City Council (the "Council") on July 15, 1996 (Ordinance No. 2539), to comply with the Washington State Growth Management Act (GMA) of 1990 (Chapter [36.70A](#) RCW), and to facilitate the orderly and coordinated growth and development of the City.
2. After public review and a recommendation from the Planning Commission, the City adopted its current Zoning Code (Title 17 PTMC) on April 7, 1997 (Ordinance No. 2571), to comply with the GMA and to implement the Plan.
3. Council adopted the City's current Comprehensive Plan/Development Regulations Amendment Process codified in Chapter 20.04 PTMC on December 16, 1996 (Ordinance No. 2559). Adoption of this chapter implemented the GMA requirement to establish procedures for plan and development regulation amendments (Sections [36.70A.130](#) and [36.70A.470](#) RCW).
4. As permitted and required by the GMA, the City has considered and adopted several amendments to its Comprehensive Plan and development regulations through the annual update and mid-cycle amendments. Periodic Review and mid-cycle amendments have been adopted via Ordinance 2879 in 2005, Ordinance 2967 in 2008, Ordinance 3075 in 2012, and Ordinance 3154 in 2016. The most recent annual amendments were adopted via Ordinances 3321, 3322, and 3323 in 2023; and

**WHEREAS**, the City has followed the periodic update procedures in Chapter 36.70A RCW and Chapter 20.04 PTMC;

**NOW THEREFORE**, the City Council of the City of Port Townsend do ordain as follows:

Section 1. Findings. Based on the record forwarded from the Planning Commission and public testimony, the City Council makes the following findings of fact:

1. The City is required to plan under RCW [36.70A.040](#). Section [36.70A.130](#) of the Revised Code of Washington requires that the City take legislative action every ten years to review and, if necessary, revise the Plan and its development regulations to ensure that the Plan and associated development regulations continue to comply with the requirements of GMA. Under the schedule established in RCW [36.70A.130](#)(5)(b), the deadline for the City to comply with the update required by RCW [36.70A.130](#)(1) is December 31, 2025.
2. The City's review and noticing requirements codified in Chapter 20.04 of the Port Townsend Municipal Code (PTMC) comply with the public participation and effective public notice requirements of the RCWs<sup>1</sup>; however, in its desire to provide an enhanced outreach and engagement program for the GMA Periodic Update, on April 15, 2024, City

Council approved a Public Participation Plan for the 2025 update as required by RCW [36.70A.130\(2\)\(a\)](#), and has followed the Public Participation Plan in its compliance review and update, providing at public meetings and hearings, the opportunity for public input, review, and comment on draft review products and Planning Commission actions. City staff implemented the program by conducting public outreach through the following meetings, presentations, and events:

- April 19, 2024, Transportation Lab Conference
- April 20, 2024, Connectivity Fair
- May 9, 2024, In-Person Visioning Workshop
- May 17-31, 2024, Virtual Visioning Workshop
- June 13, 2024, Planning Commission meeting on Community Direction Statement and Land Use Map
- June 27, 2024, Planning Commission meeting on Land Use goals and policies
- July 7, 2024, First Sunday in the Golf Park
- July 10, 2024, Planning Commission meeting
- July 20, August 17, September 21, 2024, Farmers Markets
- July 22-24, 2024, Planning Studios
- July 29, 2024, Youth and Young Adults Planning Studio
- August 12, 2024, Planning Commission Workshop with City Council
- August 27, 2024, Climate Action Committee meeting on Port Townsend and Jefferson County's Climate Resilience Elements
- August 28, 2024, Planning Commission meeting
- September 12, 2024, Planning Commission meeting
- September 18, 2024, People, Planet, and Prosperity Tour
- October 1-2, December 3-4, 2024, and January 28, 2025, class visits at Port Townsend High School
- October 10, 2024, Planning Commission Meeting
- October 15, 2024, Port Townsend Rotary
- October 23, 2024, Port Townsend Comprehensive Plan Scenarios Virtual Workshop
- October 24 – November 15, 2024, Port Townsend Comprehensive Plan Scenarios Asynchronous Workshop Participation

- November 8, 2024, and February 7, 2025, class visits at Salish Coast Elementary 4th Grade
- November 14, 2024, Planning Commission meeting
- December 3, 2024, EDC Team Jefferson Fall Mixer
- December 9, 2024, City Council and Planning Commission Joint Workshop
- December 19, 2024, Brewocracy Now
- January 9, 2025, Planning Commission Meeting on the Periodic Review Docket
- January 13, 2025, Climate Action Committee Workgroup meeting
- January 15, 2025, Open House for Walking, Biking, and Connected Communities
- January 23, 2025, Planning Commission Hearing on the Periodic Review Docket
- February 3, 2025, City Council Meeting on the Periodic Review Docket
- February 5, 2025, Climate Action Committee Workgroup meeting
- February 13, 2025, Planning Commission meeting including hearing on the Critical Areas Ordinance and discussion of Comprehensive Plan Goals and Policies
- February 18, 2025, City Council Decision on the Periodic Review Docket
- February 27, 2025, Planning Commission meeting on Comprehensive Plan Goals and Policies
- March 7-8, 2025, Connectivity Summit
- March 13, 2025, Planning Commission meeting on goals and policies in the Comprehensive Plan and the Community Direction Statement
- March 25, 2025, CAC Workgroup meeting
- March 26, 2025, Comprehensive Plan Open House
- March 27, 2025, Planning Commission Meeting reviewing the open house and discussing Comprehensive Plan goals and policies
- April 10, 2025, Planning Commission meeting on Level of Service and Comprehensive Plan goals and policies
- April 18, 2025, Parks, Recreation, and Open Space Plan Survey
- April 22, 2025, CAC Workgroup meeting
- April 24, Planning Commission meeting on existing and draft goals in the Comprehensive Plan
- May 8, 2025, Planning Commission meeting on adopted goals related to climate resilience

- May 12, 2025, CAC Workgroup meeting
- May 13, 2025, Parks Recreation Trees and Trails Advisory Board Special Meeting on existing goals and policies
- May 14-15, 21, 2025, Middle Housing Focus Groups
- May 22, 2025, Planning Commission Joint Meeting with City Council on draft Goals, Policies, Implementation, and Climate Elements
- June 9, 2025, City Council Joint Meeting with Planning Commission on draft Land Use, Housing, Goals, Policies, and Implementation Elements
- June 26, 2025, Planning Commission meeting on draft Land Use and Housing Elements
- July 7, 2025, City Council meeting on middle housing and draft Land Use and Housing Elements
- July 9, 2025, Planning Commission meeting on draft Introduction, Community Direction Statement, Transportation, Utilities, and Capital Facilities
- July 23, 2025, Planning Commission meeting on draft Transportation, Utilities, Capital Facilities, and Middle Housing
- July 24, 2025, CAC Workgroup meeting
- August 11, 2025, City Council Workshop with Planning Commission on draft PT Sustainable Streets, Active Transportation, Transportation, Utilities, and Capital Facilities
- August 13, 2025, Planning Commission meeting on draft Economic Development, Parks, Recreation, and Open Space, and Climate Resilience Elements
- August 26, 2025, Climate Action Committee Meeting on draft Port Townsend Climate Resilience Element
- August 27, 2025, Planning Commission Meeting on draft Economic Development, Parks, Recreation, and Open Space, and Climate Resilience Elements
- September 8, 2025, City Council Joint Meeting with Planning Commission on draft Economic Development, Parks, Recreation, and Open Space, and Climate Resilience Elements
- September 11, 2025, Planning Commission meeting on draft Housing Element and middle housing development regulations
- September 22, 2025, Open House on Streets, Walking, Biking, Parks, and Open Space
- September 25, 2025, Planning Commission meeting on draft Introduction and Implementation Elements

- October 2, 2025, Planning Commission Special Meeting on draft Goals, Policies, and Implementation Element
  - October 9, 2025, Planning Commission meeting on draft Goals, Policies, and Implementation and Housing Elements
  - October 23, 2025, Planning Commission open public hearing on the Periodic Review's Comprehensive Plan, Development Regulations, and Active Transportation Plan
  - November 17, 2025, City Council's open public hearing on the Periodic Review's Comprehensive Plan, Development Regulations, and Active Transportation Plan
  - November 24, 2025, City Council's continued open public hearing on the Periodic Review's Comprehensive Plan, Development Regulations, and Active Transportation Plan, adopting the first reading of the Periodic Review
  - December 8, 2025, City Council meeting on the Periodic Review's Comprehensive Plan, Development Regulations, and Active Transportation Plan
3. On June 14, 2024, the City's consultant, SCJ Alliance, prepared an analysis of the comprehensive plan and development regulations currently in effect in the City of Port Townsend for consistency with the requirements of Chapter [36.70A](#) RCW and identified revisions necessary to comply with Chapter [36.70A](#) RCW. Among other sections, this analysis reviewed amendments to the development regulations adopted in 2023 to comply with RCW 36.7A.600(1), locally known as "tactical infill." As directed by RCW 36.70A.600, Port Townsend allowed both two ADUs per parcel and the conversion of detached single family houses into fourplexes. The combination of a converted single family home into fourplex and two ADUs allowed in the R-I and R-II zones, as adopted prior to the April 1, 2023, deadline under RCW 36.70a.600, combine to functionally allow sixplexes in these low and medium density zones in the City's existing development regulations. Staff forwarded this analysis to Planning Commission for their consideration during the preliminary docketing discussion, held during an open public meeting on January 9, 2025. This checklist analysis was later revised on June 13, 2025. City staff forwarded the revised analysis for Planning Commission's consideration during an Open Public Hearing on October 23, 2025.
  4. In accordance with the criteria for assessment set forth in Section 20.04.050 PTMC, the Planning Commission considered types of proposed amendments to the Comprehensive Plan and Development regulations during a regular meeting on January 9, 2025, and an open public hearing on January 23, 2025.
  5. During Planning Commission's January 23, 2025, open public hearing, Planning Commission considered a preliminary 2025 Periodic Update Docket and recommended scope and schedule for the update, compiled by the Director.
  6. Following the January, 23, 2025, hearing, Planning Commission voted to recommend adoption of the proposed Docket to the Council.

7. The Council considered the proposed Docket at a regular meeting on February 3, 2025, and adopted it following an open public hearing on February 18, 2025, under Resolution 25-005.
8. Consistent with Section 20.04.060(B), optional joint workshops between the Planning Commission and City Council were held on December 9, 2024, May 22, June 9, August 11, and September 8, 2025, to inform the joint bodies of public input received to date and iterative edits to the draft Comprehensive Plan, Development Regulations, and Active Transportation Plan.
9. In accordance with the adopted Preliminary Docket's 2024-2025 proposed case files number 2, the Critical Areas Ordinance Update made revisions responsive to mandated and suggested amendments based on Department of Commerce Critical Areas Ordinance Checklist. The Critical Areas Ordinance Update was adopted under Ordinance 3348 on March 17, 2025.
10. In accordance with the adopted docket, staff prepared draft revisions to the Comprehensive Plan and development regulations and drafted an Active Transportation Plan. Staff forwarded these drafts and analysis to the Planning Commission, as well as the Climate Action Committee, Arts Commission, and Historic Preservation Committee for their expertise. Consistent with the requirements of both RCW [43.21C](#) and PTMC Section 20.04.070, State Environmental Policy Act (SEPA) environmental review is required for the docketed amendments. On October 15, 2025, the SEPA Responsible Official issued a Determination of Non-Significance (DNS) for the 2025 Periodic Update. No appeals to the Determination were received during the comment/appeal period.
11. The Planning Commission considered public comment and proposed revisions implementing the adopted Docket at its meetings on February 13, February 27, March 13, March 27, April 10, April 24, May 8, May 22, June 9, June 26, July 9, July 23, August 11, August 13, August 27, September 8, September 11, September 25, October 2, and October 9, 2025.
12. The Planning Commission held a public hearing on October 23, 2025, to receive public testimony on the proposed revisions to the Comprehensive Plan, Active Transportation Plan, and development regulations. Based on its review of the requirements of Chapter [36.70A](#) RCW and [20.04](#) PTMC, the Planning Commission forwarded recommended findings, conclusions, and amendments to the Comprehensive Plan, Active Transportation Plan, and development regulations on October 23, 2025 (Exhibit B).
13. The Council held a public hearing on November 17, 2025, to receive public testimony on the recommended proposed revisions.
14. The Council continued the public hearing on November 24, 2025, to receive further written comments and deliberate on the recommended proposed revisions. Council closed the hearing on November 24, 2025, and approved the first reading of the proposed revisions to the Comprehensive Plan, Active Transportation Plan, and development regulations.
15. Pursuant to the Growth Management Act [36.70A.035](#)(2) RCW and PTMC 20.04.080B(4), the public was given opportunity to review and comment on Council's proposed changes to the amendments. On December 1, 2025, a press release was sent to local news outlets and posted on the City's website informing the public of the opportunity to

provide comments on the proposed changes. The proposed revisions were published on the project website on December 3, 2025. On December 5, 2025, the proposed changes were published as part of the Council's Agenda for the December 8, 2025, Council Meeting, posted at City Hall and on the City's webpage.

16. Upon concluding the public hearing on 3361, Council reviewed the record, and deliberated upon the testimony and upon the Planning Commission's recommendation on the final docket, all in a manner consistent with the requirements of Chapter 20.04 PTMC. Deliberation was held during meetings on December 8 and 15, 2025.
17. Consistent with the requirements of the GMA, Planning Department staff forwarded the proposed amendments to the Comprehensive Plan, Development Regulations, and Active Transportation Plan to the State of Washington Department of Commerce (DOC) for review and comment on October 2, 2025, more than sixty (60) days prior to the adoption of this ordinance (Section [36.70A.106](#) RCW). No substantive comments were received from DOC prior to the 60-day deadline on December 1, 2025. Staff addressed Commerce's later comments during a presentation to Council on December 8, 2025.
18. On November 25, 2025, the Peninsula Regional Transportation Planning Organization (PRTPO) informed the City that PRTPO will take adopted, not late-stage draft, plans to the Board for consistency approval. Following the adoption of this Ordinance, the City will inform PRTPO that the Comprehensive Plan can go to the Board for consistency approval to certify that that the City's proposed comprehensive plan is consistent with the Regional Transportation Plan.
19. With the adoption of this ordinance, Port Townsend's 2025 Periodic Review required by RCW 36.70A.130(b) is complete and closed.

Section 2. Conclusions. Based on the record forwarded from the Planning Commission, the public testimony, and the findings contained in Section 1 of this Ordinance, the Council makes the following conclusions.

1. Based on the Findings in Section 1 above, the process codified in Chapter 20.04 PTMC and stated in the Public Participation Plan provides for extensive public involvement in identifying suggested Plan and development regulation amendments, and provides ample opportunities for meaningful public comment on the proposed amendments. Early, continuous, and meaningful public participation was achieved through broad dissemination of proposals and alternatives, opportunity for written comments, public meetings after effective notice, provisions for open discussion, information services, and consideration and response to public comments, consistent with the requirements of the GMA (Sections [36.70A.035](#), [36.70A.130](#), and [36.70A.140](#) RCW).
2. Based on the Findings in Section 1 above, the opportunities provided for meaningful citizen participation employed in this review and amendment process are wholly consistent with the requirements of the GMA (Sections [36.70A.035](#), [36.70A.130](#), and [36.70A.140](#) RCW) and the procedures set forth in Chapter 20.04 PTMC and the Public Participation Plan.
3. Based on the Findings in Section 1 above, its review of the requirements Chapter [36.70A](#) RCW, the analysis and proposed revisions prepared by SCJ Alliance and city staff, the recommended findings on review and proposed revisions forwarded by the Planning Commission, and the public comments received, the Council concludes that the review and needed revisions have

been prepared in conformance with applicable law, including Chapter [36.70A](#) RCW, Chapter [43.21C](#) RCW, Chapter 20.04 PTMC, and Resolution 25-005.

4. Based on its review of the requirements of Chapter [36.70A](#) RCW, the analysis and proposed revisions prepared by SCJ Alliance and city staff, the recommended findings on review and proposed revisions forwarded by the Planning Commission, and the public comments received, the Council concludes that the Comprehensive Plan and development regulations as revised by this Ordinance comply with the requirements of Chapter [36.70A](#) RCW.
5. Pursuant to PTMC Section 20.04.020, the amendments have been considered concurrently, and the Council has considered the cumulative effect of all items.
6. This ordinance has been prepared in conformance with the goals and requirements of the GMA (Chapter [36.70A](#) RCW), and the Council concludes that it is externally consistent and compatible with the 14 state-wide planning goals contained within the GMA (Section [36.70A.020](#) RCW).
7. This ordinance has also been reviewed against the requirements of the County-Wide Planning Policy for Jefferson County (CWPP), and the Council concludes that it is in conformance with that Policy.
8. Having adopted findings and conclusions as provided for in Chapter [36.70A](#) RCW and Chapter 20.04 PTMC, the Council adopts the following amendments:

#### Section 3. Comprehensive Plan Update.

1. The City Council adopts the Findings, Conclusions, and Recommendations of the Port Townsend Planning Commission dated October 23, 2025 (Exhibit B)
2. The 1996 Comprehensive Plan is amended to read as set forth in Exhibits D-M and U, XX along with the changes noted in the Errata Sheet at Exhibit X.

#### Section 4. Development Regulations Update.

1. Chapter 2.73 of the Port Townsend Municipal Code is amended to read as set forth in Exhibit O.
2. Chapter 12 of the Port Townsend Municipal Code is amended to read as set forth in Exhibit P.
3. Chapter 17 of the Port Townsend Municipal Code is amended to read as set forth in Exhibit Q.
4. Chapter 18 of the Port Townsend Municipal Code is amended to read as set forth in Exhibit R.
5. Chapter 20 of the Port Townsend Municipal Code is amended to read as set forth in Exhibit S.
6. The Amendments to the Development Regulations listed in this Section are further amended by the changes noted in the Errata Sheet at Exhibit X.

#### Section 5. Active Transportation Plan Adoption.

The Active Transportation Plan is adopted to read as set forth in Exhibit N along with the changes noted in the Errata Sheet at Exhibit X.

Section 6. Severability. If any sentence, clause or phrase of this ordinance should be held to be invalid or unconstitutional by a court of competent jurisdiction, such invalidity or unconstitutionality shall not affect the validity or constitutionality of any other section, sentence, clause or phrase or work of this ordinance.

Section 7. Transmittal to Department of Commerce. The City Clerk shall transmit a copy of this Ordinance to the State Department of Commerce (DOC) within ten (10) days of adoption of this ordinance.

Section 8. Corrections. Notwithstanding any provisions to the contrary in Chapter 1.01.015 of the Port Townsend Municipal Code, staff and the Code Reviser are authorized to update and incorporate changes adopted in this Ordinance into the Port Townsend Comprehensive Plan and the Port Townsend Municipal Code including but not limited to changes to the Land Use Map and Zoning Map. Staff and the Code Reviser are further authorized to make non-substantive edits related to numbering, grammar, spelling, and formatting consistent with this Ordinance.

Section 9. Implementation. The City Manager or designee is authorized to implement such administrative measures as may be necessary to carry out the directions of this Ordinance.

Section 10. Effective Date. This ordinance shall take effect and be in force 5 days following its publication in the manner provided by law. The amendments to the Comprehensive Plan and Development Regulations, and the adoption of the Active Transportation Plan, shall take effect as provided for in RCW [36.70A.106](#).

**ADOPTED** by the City Council of the City of Port Townsend, Washington, at a regular meeting thereof, held this 15<sup>th</sup> day of December, 2025.



David Faber

Mayor

Amy Howard  
Deputy Mayor

Attest:



Alyssa Rodrigues

City Clerk