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Port Townsend City Council  
250 Madison Street, Suite 2  
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**Subject: Clarification on Key Issues Associated with R-II Zoning District Changes  
(Maximum and Minimum Density, Building Height, Street LOS F)**

Honorable Mayor Howard, Deputy Mayor Rowe, and City Council Members,

We are writing to seek clarification on the recent amendments to the R-II zoning district regulations, specifically those related to the allowable maximum and minimum residential density, maximum building height and Level of Service F designation for streets within the district.

The new regulations have generated questions among residents about how these changes will direct future development within the City. Our primary objective in writing is to confirm our understanding of the specific metrics that have been adopted as part of the density increases. We have included what we know to be pertinent references from the Comprehensive Plan document and appreciate information on others we may have missed or be unaware of, followed by our interpretations of that information for each issue.

Issue 1. Regarding maximum unit density and minimum lot sizes allowed:

From Ordinance 3361 adoption language:

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.

From the development regulations bulk and dimensional standards included in the 968 page document downloaded from the Comprehensive Plan section of City website (pages 869-870 of the PDF) vs adopted code updates that are not yet available through the Code section of City website:

Table 17.16.030

Residential Zoning Districts – Bulk, Dimensional and Density Requirements

DISTRICT	R-I	R-II	R-III	R-IV
MAXIMUM HOUSING DENSITY (units per 40,000 square foot area)	<p>4 dwelling units, except the following are exempt from maximum density calculations:</p> <p>(Multiple dwelling units on a single lot must be contained within a single structure, except: a permitted accessory dwelling unit (ADU) may be established in a separate building if allowed by PTMC 17.16.020)</p> <p>(10,000 sf of lot area per unit, except 5,000 sf of lot area per unit for a duplex)</p> <ol style="list-style-type: none"> <li>1. duplex, triplex, or fourplex conversion of a single-family detached unit;</li> <li>2. Duplex on a single lot with 5,000 sf of lot area per unit, or single-family detached unit with up to two accessory dwelling units.</li> </ol> <p>A bonus density of 20%, or 1 unit, whichever is greater, is allowed for affordable housing development on property owned by a religious organization.</p>	<p>8-32 dwelling units, except 6 units per 5,000 square feet for infill projects with 10,000 square feet or less of lot area.</p> <p>(Multiple dwelling units on a single lot must be contained within a single structure, except: a permitted accessory dwelling unit (ADU) may be established in a separate building if allowed by PTMC 17.16.020)</p> <p>(5,000-2,500 sf of lot area per unit; per detached single-family unit; 2,500 for any multifamily structure; and 1,150 sf of lot area per attached single-family unit)</p> <p>A bonus density of 20%, or 1 unit, whichever is greater, is allowed for affordable housing development on property owned by a religious organization.</p>	<p>46-48 units * Lodging house sleeping units count as one-quarter of a dwelling unit per 10,000 sf of lot area</p> <p>A bonus density of 20%, or 1 unit, whichever is greater, is allowed for affordable housing development on property owned by a religious organization.</p>	<p>48-60 units * Lodging house sleeping units count as one-quarter of a dwelling unit per 10,000 sf of lot area</p> <p>A bonus density of 20%, or 1 unit, whichever is greater, is allowed for affordable housing development on property owned by a religious organization.</p>
MINIMUM AVERAGE HOUSING DENSITY (units per 40,000 square foot area)	4 units	8 units	10-12 units	48-16 units
MAXIMUM NUMBER OF DWELLING UNITS IN ANY ONE STRUCTURE	4 (Note: limited structures with more than 4 dwellings per structure may be permitted through the PUD process; see Chapter 17.32 PTMC)	Structures with 5, 6, 7, or 8 dwellings may be permitted through a conditional use permit	No limit	No limit
MINIMUM LOT SIZE	<p>10,000 sf = single-family detached</p> <p>5,000 sf = single-family attached (duplex only)</p>	<p>2,500-3,000 sf = single-family detached</p> <p>1,150 sf = each unit of single-family attached</p>	<p>2,500-4,000 sf = single-family detached; 5,000 sf = single-family attached (duplex); 2,500 sf = each unit for a zero lot line</p>	

Language in question

DISTRICT	R-I	R-II	R-III	R-IV
		2,500 sf = multi-family	detached: 7,500 sf = single-family attached (triflex): 10,000 sf = single-family attached (quadplex) and 12,500 sf = multi-family <sup>24</sup>	
MINIMUM LOT WIDTH	50'	50' - single-family detached 14'	50' except: 400' = multi-family 25' = single-family detached  No minimum lot width for attached units.	

Language in question

Interpretation / Questions regarding R-II requirements:

- A. Maximum Housing Density:
  - i. Our interpretation, per highlights in Ordinance paragraph, is that the allowable maximum is 6 units per 5,000 SF (48 units per 8 lot block) which contradicts the 32 unit maximum stated in the table.
  - ii. Per language in table:
    - a. Our interpretation is 32 units indicates a standard 5,000 SF lot would be 4 units (as with pre-amendment 2023 density).
    - b. Our interpretation is that "except 6 units per 5,000 SF for infill projects with 10,000 square feet or less of lot area" means that standard is 4 units per 5,000 SF except for a double lot (10,000 SF) which can be up to 12 units.
    - c. We interpret that to mean that 48 units are the permissible total if 4 - 2 lot (10,000 SF) projects are done.
- B. Minimum Average Density: Our understanding is that a property owner with a double lot (10,000 SF) could not build one single-family unit on one of the two lots. That the minimum development would need to include 2 units minimum at time of permitting. Further, a single family unit could not be built if it would straddle or cross the lot line. That is, the second lot needs to be 'reserved' for future development.
- C. Maximum Number of Dwelling Units In Any One Structure: Our interpretation is that "No Limit" means that a single structure on a full block (40,000 SF) could be any size, not limited to 32 or 48 units.
- D. Minimum Lot Size: Our interpretation is that with allowable minimum lot sizes of 2,500 SF and 1,150 SF that up to 2 units and 1 unit, respectively, are allowed.
- E. Minimum Lot Width: Our interpretation is that a 14' minimum would result in a 1,400 SF lot.

## Issue 2. Regarding building height:

From page 871 of the Comprehensive Plan PDF:

Port Townsend Municipal Code  
Chapter 17.16 RESIDENTIAL ZONING DISTRICTS

Page 24/94

DISTRICT	R-I	R-II	R-III	R-IV
		No setback for zero-lot line and attached developments.		
MAXIMUM BUILDING HEIGHT	30'	30' for detached single-family 35' for attached units and multifamily	35' for detached and attached single-family 35' for multifamily	35' for detached and attached single-family 35' for multifamily
MAXIMUM LOT COVERAGE	25% except 40% where an ADU or multiple units are included in the lot	35% except off 45% where an ADU or multiple units are included in the lot	65.45%	75.60%
MAXIMUM FENCE HEIGHT*	Any lot line abutting a public r-o-w = 4'; any lot line not abutting a public r-o-w = 8'; rear abutting a public street r-o-w = 4'; see note below	Any lot line abutting a public r-o-w = 4'; any lot line not abutting a public r-o-w = 8'; rear abutting a public street r-o-w = 4'; see note below	Any lot line abutting a public r-o-w = 4'; any lot line not abutting a public r-o-w = 8'; rear abutting a public street r-o-w = 4'; see note below	Any lot line abutting a public r-o-w = 4'; any lot line not abutting a public r-o-w = 8'; rear abutting a public street r-o-w = 4'; see note below

<sup>10</sup> In order to achieve the minimum density, a subdivision of parcels 12,000 square feet or greater shall not allow individual lots larger than 4,000 square feet unless it can be assured that the minimum density will be achieved.

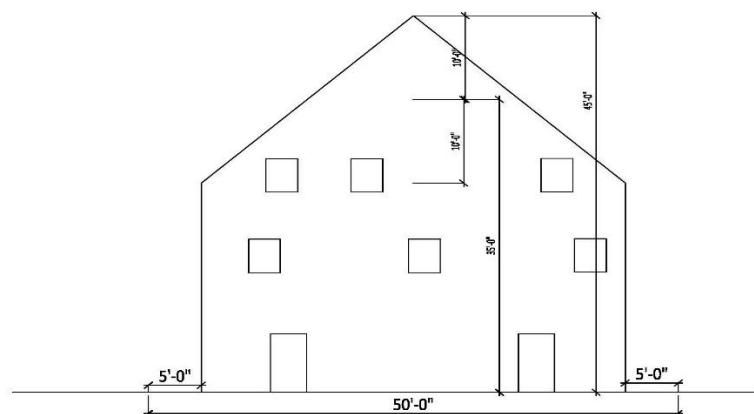
\*Note: Maximum heights for up to 100 percent solid fences apply within any required front, side, or rear setback area or along the lot line except within the clear vision area; refer to Chapter 17.08 PTMC, Fences, Walls, Arbors and Hedges, for specific requirements. Standards apply to open and unopened right-of-way (r-o-w).

### Language in Question

#### Interpretation:

Maximum building height of 35' could be as tall as shown (45').

Multifamily or attached building with a mid gable height of 35' off grade



### Issue 3. Regarding adoption of LOS F for streets serving the R-II zone:

Per Transportation element Page 141 (PDF page 171)

#### **Level of Service**

The 2025 Periodic Update changes the traffic LOS standard from D to F to de-emphasize development of large streets and expensive infrastructure focused on motor vehicles. This change is substantiated by the existing levels of service review as described in this element in which intersections other than Sims Way are not experiencing significant delays. More detail on Level of Service is provided in the Capital Facilities Element.

From the Active Transportation Plan Dec 10, 2025 (Comp Plan PDF page 519):

#### **Port Townsend Municipal Code Chapter 12.04**

New development must comply with transportation concurrency requirements per PTMC Chapter 12.06. This means a project can only proceed if adequate transportation facilities are in place or will be provided within six years of the development's impact. A number of concurrency models for active transportation have been tried as outlined below. Most of these models are in highly urbanized areas and thus setting concurrency requirements for Active Transportation may take a simplified approach.

Page 824 of Comprehensive Plan PDF:

#### **12. 04. 030 Definitions.**

Level of service" (LOS)" standards are quantitative and qualitative measures describing both the operational conditions for the traveling public within a traffic stream and the perception of these conditions by motorists and/or passengers, as further described in the city arterial street plan. Each level of service describes these conditions in objective terms such as speed, travel time, or vehicle density (i.e., the number of vehicles per mile) related to traffic and active transportation users. ...

Level of service may also include a qualitative rating of how well other units of transportation such as sidewalks, bikeways, walkways or transit routes, meet current or projected demand.

PDF page 829:

#### **C. Purpose.**

1. The purpose of the engineering design standards manual is to establish, in one comprehensive document, prescriptive and performance standards and procedures for infrastructure development. The manual updates and revises existing standards for the construction of right- of-way improvements in order to implement the Port Townsend Comprehensive Plan and to make the requirements for transportation system development more uniform, clear, consistent and predictable.

Comprehensive Plan PDF page 834:

12. 04. 130 General right- of- way improvement and construction requirements. Detailed requirements and standards for rights -of -way and transportation system Improvements and development requirements are contained in the engineering design standards manual.

City of Port Townsend Engineering Design Standards Manual 1997 from City website:

Chapter 6 Transportation page 6-9:

11. Level of Service Standards

- a. Any new development proposal may be required to perform a traffic impact analysis and assess the impact on traffic for the existing streets.
- b. Where a project is served by a street system of arterials and collectors that is below level of service D or will fall below LOS D as a result of the development, the GMA concurrency requirements must be met.

From Comp Plan PDF page 197

Capital Facilities Element

Concurrency

To serve new growth and development, the GMA requires that certain facilities and services be provided concurrent with new development. In the case of transportation improvements, a financial commitment to provide them within six years must be made. Facilities that are subject to concurrency in the City are transportation, water, wastewater, and stormwater. The Capital Facilities Plan details funding sources and the investment needed to provide this concurrency, describing current and upcoming projects.

Interpretations:

- A. Our interpretation is that LOS F is now applied to all local streets within R-II.
- B. Our interpretation is that standards regarding developer responsibilities for LOS F required to build and / or improve roads that already exist due to impacts that new or infill development may have on traffic volume and / or on-street parking generated are not defined in the various reference documents.

Are our interpretations relating to issues 1 – 3 accurate? We kindly request a formal response detailing these density and LOS requirements. Please respond via the email addresses provided.

Clarity on these standards will allow affected property owners and residents to better understand and engage with the Planning and Community Development department regarding future development projects. We are sure that you will agree that transparent communication is vital for community buy-in and effective urban planning.

Thank you for your time and dedication to serving the residents of Port Townsend.

Sincerely,

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Todd McGuire

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John Watts