

7. Adequate Provisions Documentation

RCW 36.70A.070(2)(d) requires jurisdictions planning under the GMA to include in their comprehensive plan a housing element that “[m]akes adequate provisions for existing and projected needs of all economic segments of the community, including:

- (i) Incorporating consideration for low, very low, extremely low, and moderate-income households;
- (ii) Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations;
- (iii) Consideration of housing locations in relation to employment location; and
- (iv) Consideration of the role of accessory dwelling units in meeting housing needs.”

7.1 Housing units needed to manage both current and projected housing needs, broken down by income bracket

Income Level	Percent Area Median Income	Net New Units Needed, 2020-2044
Extremely Low Income	0-30% Permanent Supportive Housing (PSH)	1,214
	0-30% Other (Non-PSH)	2,768
Very Low Income	>30-50%	2,376
Low Income	>50-80%	1,996
Moderate	>80-100%	1,028
	>100-120%	1,012
Above Moderate	>120%	4,103
Total		14,497
Temporary housing needs		Net new beds needed, 2020-2044
Emergency Housing/Shelter		537

Table 15. Review of Housing Unit Need by Income Level



7.2 Documenting programs and actions needed to achieve housing availability

Kitsap County is not required to construct housing or ensure that housing is produced. However, the County must identify barriers to housing production and make adequate provisions to accommodate all housing needs. Alternative 1 of the Environmental Impact Statement (draft released on December 15, 2023), the “No Action” alternative, falls far short of making adequate provisions for those making 80 percent or less of the median income.

Under Alternative 2 (and the Preferred Alternative), the following analysis demonstrates how the County makes adequate provisions to accommodate all housing needs.

7.2.1 Review housing production trends to determine if barriers exist

Zone	SF Units	SF Historical average annual trend (7 yr)	MF Units	MF Historical average annual trend (7 yr)	ADUs	Total Units	Total Historical average annual trend
Greenbelt	7	1	0	0	1	8	1.1
Urban Restricted	199	28.4	2	0.3	0	201	28.7
Urban Low Residential	510	72.9	24	3.4	3	537	76.7
Urban Medium Residential	217	31	24	3.4	1	242	34.6
Urban High Residential	12	1.7	0	0	0	12	1.7
Mixed Use ¹⁴	2	0.3	41	5.9	0	43	6.1
Total Urban	937	133.9	100	14.3	5	1,043	149
Rural Residential	1,296	185.1	0	0	21	1,317	188.1
Rural Protection	239	34.1	0	0	7	246	35.1
Rural Wooded	60	8.6	0	0	1	61	8.7
Total Rural	1,595	227.9	0	0	29	1,624	232

Table 16. Residential Building Permits in Unincorporated Kitsap County, 2013-2019 (2021 Buildable Lands Report, Facet analysis)

¹⁴ The mixed use zone was established in the 2006 comprehensive plan but removed in the 2016 comp plan update and during the evaluation period for the Buildable Lands Report.

Income level (% AMI)	Projected housing need (2020-2044)	Housing type(s) that best serve these needs	Aggregated housing need (2020-2044)	Annual unit production needed	Historical average annual unit production ¹⁵	Is there a barrier to sufficient production?
0-30% PSH	1,214	Low-Rise and Mid-Rise (walk-ups up to 3 stories, apartments, condos)	8,354	348	42	YES
0-30% Non-PSH	2,768					
>30-50%	2,376					
>50-80%	1,996					
>80-100%	1,028	Moderate Density (townhomes, duplex, triplex, 4-plex) + ADUs	2,040	85	76.7	YES
>100-120%	1,012					
>120%	4,103	Low Density (single family detached)	4,103	171	262	NO

Table 17. Comparison of production trends to housing needs to determine if barriers exist

¹⁵ Rounded to the nearest half-unit from BLR table on previous page

7.3 Gather information to determine what kind(s) of barriers exist

7.3.1 Moderate Density housing barrier review checklist

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
Development regulations			
Unclear development regulations	Yes	<ul style="list-style-type: none"> Definitions related to land divisions located in Title 21 (land use and development procedures), not Title 16 (Land Division and Development) Inconsistent definitions identified in Titles 16 and 17 Public street and street connectivity requirements located in Title 17 (Zoning) instead of Title 16 (Land Division and Development) Unclear recreational open space tract locations Inconsistency between Shoreline Master Program and development regulations on maximum building heights in shoreline jurisdiction Performance Based Development (PBD) not effective (rarely used and causes confusion) 	<ul style="list-style-type: none"> Split-zoned site development regulations clarified (17.120.040.C) Moved single-family subdivision and development standards from Title 17 to Title 16 Definitions revised for clarity re: boarding houses, cottage housing, day care centers, and various residential development types (17.110.112, 196, 200, 205, 245, 504, 682, and 683) Consolidated Performance Based Development (PBD) permit (17.450) with Subdivision Permit, so it can all be done under one review.
Prohibiting some moderate density housing	No	Most urban zones in existing code/comp plan actually allow duplexes,	N/A

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
types, such as: duplexes, triplexes, four/five/six-plexes, townhomes, cottage housing, live-work units, manufactured home parks		townhouses, cottage housing, mobile homes, and multifamily housing. The issue is more with the dimensional regulations (see next row)	
High minimum lot sizes	Yes	<ul style="list-style-type: none"> Existing development regulations contain various barriers to middle housing and multifamily, especially density, setbacks, lot coverage, impervious surface maximums, and more 	<ul style="list-style-type: none"> Minimum lot sizes and dimensions are reduced or removed from many urban residential zones to improve development flexibility (17.420.052)
Low maximum densities or low maximum FAR	Yes	<ul style="list-style-type: none"> Existing development regulations contain various barriers to middle housing and multifamily, especially density, setbacks, lot coverage, impervious surface maximums, and more 	<ul style="list-style-type: none"> Increase max density from 9 du to 14 du/ac in Urban Low and Urban Cluster zones if development is attached, cottage, or multifamily Minimum density in commercial zone increased from 10 du/acre to 19 du/acre(17.420.054) Maximum density for Commercial in Kingston removed (17.420.054) Removed max density in the RC zone, increased allowed heights in Silverdale Regional Center (17.420.058)
Low maximum building heights	Yes	<ul style="list-style-type: none"> Building height limitations, especially in Silverdale, limit provision of enough 	<ul style="list-style-type: none"> Increased max density, allowed heights in Silverdale Regional Center and in Commercial zone and many

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
		housing below 80% AMI	UGAs in the County (17.420.058)
Large setback requirements	Yes	<ul style="list-style-type: none"> Urban residential zones have side setbacks that are a disincentive to attached housing. Some urban zones have front setbacks that also may limit developable area. 	<ul style="list-style-type: none"> Reductions (from 20' to 10' for habitable space and 0' side setback for attached housing) and standardization of setbacks for urban residential zones (17.420.052)
High off-street parking requirements	Yes	<ul style="list-style-type: none"> Current standards have off-street parking requirements that preclude garage spaces from counting toward the parking requirement 	<ul style="list-style-type: none"> Update and reduce residential parking standards. Allow 1 garage space to county toward parking requirement (17.490.030)
High impervious coverage limits	Yes	<ul style="list-style-type: none"> Off-street parking standards do not allow permeable pavement 	<ul style="list-style-type: none"> Remove maximum impervious surface area requirements for Silverdale Regional Center (17.420.058) Off-street parking standards revised to allow permeable pavement in parking areas (17.490.020)
Lack of alignment between building codes and development codes	No	<ul style="list-style-type: none"> N/A 	N/A
Other	Yes	<ul style="list-style-type: none"> No max size of cottage housing units 	<ul style="list-style-type: none"> Revise definition to clarify development characteristics. Create cap of 1,000 square feet per unit (17.110.196)
Process Obstacles			
Conditional use permit process	Yes	<ul style="list-style-type: none"> Some permits require quasi-judicial approval of subdivisions and site 	<ul style="list-style-type: none"> New section in Title 16 allows for administrative approval of amendments

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
		development activity permits <ul style="list-style-type: none"> Multi-family construction is an administrative conditional use in several zones 	to SDAPs related to subdivisions in certain situations (16.40.040.D.1) <ul style="list-style-type: none"> ACUP to P for multi-family in Urban Village Commercial (17.410.044)
Design review	No		<ul style="list-style-type: none"> Updated Silverdale Regional Center Plan includes goals and policies calling for adopting and updating development and design standards. However, the County does not have a “design review” procedure that forms a barrier to moderate-density housing.
Lack of clear and accessible information about process and fees	Yes	<ul style="list-style-type: none"> ADU regulations do not comply with HB 1337 	<ul style="list-style-type: none"> Impact fees for ADUs not to exceed 50 percent of single-family dwelling fees
Permit fees, impact fees and utility connection fees	Yes	<ul style="list-style-type: none"> ADU regulations do not comply with HB 1337 	<ul style="list-style-type: none"> Impact fees for ADUs not to exceed 50 percent of single-family dwelling fees
Process times and staffing challenges	Yes	<ul style="list-style-type: none"> Permit time represents a cost that is passed on to consumers 	<ul style="list-style-type: none"> County is implementing expedited permit review program
Limited Land Availability and Environmental Constraints			
Lack of large parcels for infill development	No	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A
Environmental constraints	Potentially	<ul style="list-style-type: none"> CAO updates may result in increased buffers in some instances, reducing availability of sites with development capacity. PBD code is unclear. 	<ul style="list-style-type: none"> Consolidated Performance Based Development (PBD) permit (17.450) with Subdivision Permit, so it can all be done under one review. CAO update (forthcoming)



Table 18. Moderate Density housing barrier review checklist

7.3.2 Low-Rise or Mid-Rise housing barrier review checklist

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
Development regulations			
Unclear development regulations	Yes	<ul style="list-style-type: none"> • Inconsistent definitions identified in Titles 16 and 17 • Public street and street connectivity requirements located in Title 17 (Zoning) instead of Title 16 (Land Division and Development) • Unclear recreational open space tract locations • Inconsistency between Shoreline Master Program and development regulations on maximum building heights in shoreline jurisdiction • Performance Based Development (PBD) not effective (rarely used and causes confusion) 	<ul style="list-style-type: none"> • Split-zoned site development regulations clarified (17.120.040.C) • Moved single-family subdivision and development standards from Title 17 to Title 16 • Definitions revised for clarity re: boarding houses, cottage housing, day care centers, and various residential development types (17.110.112, 196, 200, 205, 245, 504, 682, and 683) • Consolidated Performance Based Development (PBD) permit (17.450) with Subdivision Permit, so it can all be done under one review. • Expand modification process for multifamily development and provide criteria for allowing greater building heights and adjustments to parking circulation (17.420.035)
High minimum lot sizes	Yes	<ul style="list-style-type: none"> • Existing development regulations contain various barriers to multifamily housing, especially density, setbacks, lot coverage, 	<ul style="list-style-type: none"> • Minimum lot sizes and dimensions are removed from many urban residential zones to improve development flexibility (17.420.052)

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
		impervious surface maximums, and more	
Low maximum densities or low maximum FAR	Yes	<ul style="list-style-type: none"> Existing development regulations contain various barriers to middle housing and multifamily, especially density, setbacks, lot coverage, impervious surface maximums, and more 	<ul style="list-style-type: none"> Minimum density in Commercial zone increased (17.420.054) Maximum density for Commercial in Kingston removed (17.420.054) Increased max density, allowed heights in Silverdale Regional Center (17.420.058)
Low maximum building heights	Yes	<ul style="list-style-type: none"> Building height limitations, especially in Silverdale, limit provision of enough housing below 80% AMI Stair shafts are included in max building height 	<ul style="list-style-type: none"> Increased max density, allowed heights in Silverdale Regional Center (17.420.058) Increased maximum heights for construction with flexibility to build higher if providing public benefits in Commercial and High Urban zones (17.420.052, 054 and 060(62)) Allow stairs and stair shafts to exceed max building height (17.420.060(40)) Increased allowed heights in Commercial Zone (17.420.054)
Large setback requirements	No	<ul style="list-style-type: none"> Setbacks are already zero or very small for zones where low- and mid-rise residential are allowed and are the focus 	N/A
High off-street parking requirements	Yes	<ul style="list-style-type: none"> Parking requirements for commercial and residential 	<ul style="list-style-type: none"> Update and reduce residential parking standards (Alternative 2).



Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
		uses potentially a barrier to adding more units	Allow 1 garage space to count toward parking requirement (17.490.030) <ul style="list-style-type: none"> Update and reduce some commercial parking standards to apply High Capacity Transit Station standards to all commercial uses (Alternative 2) (17.490.030)
High impervious coverage limits	Yes	<ul style="list-style-type: none"> allowance of higher impervious coverage allows for higher densities while accommodating off street parking. 	<ul style="list-style-type: none"> Remove maximum impervious surface area requirements for Silverdale Regional Center (17.420.058) Off-street parking standards revised to allow permeable pavement in parking areas (17.490.020)
Lack of alignment between building codes and development codes	No	<ul style="list-style-type: none"> N/A 	N/A
Other	Yes	<ul style="list-style-type: none"> Maximum lot coverage in the Urban High zone is inconsistent with adjacent Commercial zoned land 	<ul style="list-style-type: none"> Maximum lot coverage for Urban High is removed consistent with requirements for adjacent Commercial land (17.420.052)
Process Obstacles			
Conditional use permit process	Yes	<ul style="list-style-type: none"> Multifamily units are an administrative conditional use permit in some zones. 	<ul style="list-style-type: none"> ACUP to P for multi-family in Urban Village Commercial (17.410.044)
Design review	No	<ul style="list-style-type: none"> Updated Silverdale Regional Center Plan includes goals and policies calling for adopting and updating development and design 	<ul style="list-style-type: none"> N/A

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
		standards. However, the County does not have a “design review” procedure that forms a barrier to moderate-density housing.	
Lack of clear and accessible information about process and fees	Yes	<ul style="list-style-type: none"> ADU regulations do not comply with HB 1337 	<ul style="list-style-type: none"> Impact fees for ADUs not to exceed 50 percent of single-family dwelling fees
Permit fees, impact fees and utility connection fees	Yes	<ul style="list-style-type: none"> ADU regulations do not comply with HB 1337 	<ul style="list-style-type: none"> Impact fees for ADUs not to exceed 50 percent of single-family dwelling fees
Process times and staffing challenges	Yes	<ul style="list-style-type: none"> Permit time represents a cost that is passed on to consumers 	<ul style="list-style-type: none"> County is implementing expedited permit review program
Limited Land Availability and Environmental Constraints			
Lack of large parcels for infill development	No	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A
Environmental constraints	Potentially	<ul style="list-style-type: none"> CAO updates may result in increased buffers in some instances, reducing availability of sites with development capacity. PBD code is unclear. 	<ul style="list-style-type: none"> Consolidated Performance Based Development (PBD) permit (17.450) with Subdivision Permit, so it can all be done under one review. CAO update (forthcoming)
Gaps in local funding	Yes	<ul style="list-style-type: none"> No financial incentive for development of affordable units 	<ul style="list-style-type: none"> Multi-family tax exemption program (MFTE) if/when the program becomes available to Kitsap County.

Table 19. Low- to Mid-Rise Multifamily housing barrier review checklist

7.3.3 Permanent Supportive Housing (PSH) and emergency housing

As noted in the previous section, Kitsap County has ample capacity for emergency housing. However, the permanent supportive housing and emergency housing analysis is as follows.

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
Development regulations			
Spacing requirements (for example, minimum distance from parks, schools or other emergency/PSH housing facilities)	No	<ul style="list-style-type: none"> County does not have spacing requirements for permanent supportive housing 	<ul style="list-style-type: none"> N/A
Parking requirements	Yes	<ul style="list-style-type: none"> County currently requires 1.5 spaces per multifamily unit plus 0.5 per unit on the street or set aside Parking for emergency housing or non-multifamily iterations of PSH determined by the director 	<ul style="list-style-type: none"> Reductions and standardization in parking requirements (17.490.030)
On-site recreation and open space requirements	No	<ul style="list-style-type: none"> No open space or recreation space requirements that are different from multifamily 	N/A
Restrictions on support spaces, such as office space, within a transitional or PSH building in a residential zone	Yes	<ul style="list-style-type: none"> There are no standards specific to office support within permanent supportive housing or group housing. There is a lack of clarity 	<ul style="list-style-type: none"> PSH should have its own definitions and standards in KCC 17.110.318. Additional code is needed to clarify rules for PSH and indoor emergency shelter.

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
Arbitrary limits on number of occupants (in conflict with RCW 35A.21.314)	No	<ul style="list-style-type: none"> • Group living (one to 6 rooms) shall meet minimum density and shall not exceed the maximum density for the zone or 6 boarding rooms, whichever is greater • Group living (seven or more rooms) shall meet the minimum density and shall not exceed the maximum density for the zone or six boarding rooms, whichever is greater • Transitory accommodations (17.505) 	May need additional code on this – transitory accommodations do not apply to PSH as written but contain separate standards
Requirements for PSH or emergency housing that are different than the requirements imposed on housing developments generally (in conflict with RCW 36.130.020)	Yes	<ul style="list-style-type: none"> • There are no standards specific to office support within permanent supportive housing or group housing. There is a lack of clarity 	<ul style="list-style-type: none"> • development standards for PSH should be established in order to comply with RCW 36.130.020. Standards cannot be more restrictive than standard housing developments however preferential treatment for affordable housing, such as reduces setbacks, parking standards, etc. can be implemented. If reduced standards are not desired it should be established that the same standards apply to PSH that apply to standard housing projects.
Other restrictions specific to emergency shelters,	Yes	<ul style="list-style-type: none"> • There are no standards specific to office support within permanent supportive housing or 	<ul style="list-style-type: none"> •



Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
emergency housing, transitional housing and permanent supportive housing		group housing. There is a lack of clarity	
Gaps in local funding	Yes	<ul style="list-style-type: none"> No financial incentive for development of affordable units 	<ul style="list-style-type: none"> Sales and use tax for affordable housing (KCC 4.35) as well as sales and use tax for housing-related expenses (KCC 4.34) County is exploring feasibility of MFTE should the statutory basis change within the planning period

Table 20. PSH and Emergency Housing barrier review checklist

7.3.4 Accessory Dwelling Unit (ADU) barrier review checklist

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
Development regulations			
<p>Must allow two ADUs on each lot in urban growth areas;</p> <p>May not require the owner to occupy the property, and may not prohibit sale as independent units, but may restrict the use of ADUs as short term rentals;</p> <p>Must allow an ADU of at least 1,000 square feet;</p> <p>Must set parking requirements based on distance from transit and lot size;</p> <p>May not charge more than 50% of the impact fees charged for the principal unit;</p>	Yes	<ul style="list-style-type: none"> Various sections of code needed to be revised on account of HB 1337 	<ul style="list-style-type: none"> Various revisions to section 17.415.010 KCC including Limiting impact fees to 50% of primary dwelling, Increasing ADUs to a maximum of 1,000 sq. ft.,

Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
<p>Must permit ADUs in structures detached from the principal unit; May not restrict roof heights of ADUs to less than 24 feet, unless that limitation applies to the principal unit; May not impose setback requirements, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review for ADUs that are more restrictive than those for principal units; Must allow an ADUs on any lot that meets the minimum lot size required for the principal unit; Must allow detached ADUs to be sited at a lot line if the lot line abuts a public alley, unless the city or county routinely plows snow on the public alley; Must allow conversions from existing structures, even if they violate current code requirements for setbacks or lot coverage; and May not require public street improvements as a condition of permitting ADUs.</p>			<ul style="list-style-type: none"> Allowing ADUs to be sold independent of principal unit.
Unclear development regulations	No	<ul style="list-style-type: none"> 17.415.010 is clear but is being modified as per the previous line. 	<ul style="list-style-type: none"> N/A
Large setback requirements	No	<ul style="list-style-type: none"> Setback requirements being reduced as part of changes to 17.420.52 KCC, which also apply to ADUs 	N/A
Off-street parking requirements	Yes	<ul style="list-style-type: none"> Changes to off-street parking requirements 	<ul style="list-style-type: none"> See previous



Barrier	Is this barrier likely to affect housing production?	Why or why not?	Actions being proposed to address barrier
		in 17.415.010 to comply with HB 1337.	
Other (for example: burdensome design standards, tree retention regulations, historic preservation requirements, open space requirements, etc.)	No	<ul style="list-style-type: none"> No other burdensome standards for ADUs identified in code. 	N/A
Process Obstacles			
Lack of clear and accessible information about process and fees	No	<ul style="list-style-type: none"> Kitsap County Code and fee schedules contain specific lines for ADUs 	<ul style="list-style-type: none"> N/A
Permit fees, impact fees and utility connection fees that are not proportionate to impact	No	<ul style="list-style-type: none"> Fee schedule ordinance contains specific line for ACUP for ADUs 	<ul style="list-style-type: none"> N/A
Processing time and staff challenges	Yes	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Expedited permitting for multi-family developments

Table 21. ADU barrier review checklist

7.4 Checklist for local option tools for addressing affordable housing funding gaps

Local option tools for addressing affordable housing funding gaps*	Implementation Status	Plans for Implementation
Housing and related services sales tax (RCW 82.14.530)	Implemented in KCC 4.34	Already implemented
Affordable housing property tax levy (RCW 84.52.105)		
REET 2 (RCW 82.46.035) GMA jurisdictions only and only available through 2025	Allowed by inference in KCC 4.56	Already implemented

Affordable Housing Sales Tax Credit (RCW 82.14.540) – was only available to jurisdictions through July 2020	Implemented in KCC 4.35	Already implemented
Lodging Tax (RCW 67.28.150 and RCW 67.28.160) to repay general obligation bonds or revenue bonds	Not eligible (only municipalities are eligible)	N/A
Mental Illness and Drug Dependency Tax (RCW 82.14.460) – jurisdictions with a population over 30,000	Implemented in KCC 4.33	Already implemented
Donating surplus public lands for affordable housing projects (RCW 39.33.015)		
Impact fee waivers for affordable housing projects (RCW 82.02.060)	Implemented by KCC 4.110.030	Already implemented
Application fee waivers or other benefits for affordable housing projects (RCW 36.70A.540)	County currently developing an expedited permit review program for multifamily housing projects, including affordable housing projects.	Being implemented concurrent with this comprehensive plan periodic update and associated development regulations amendments.
Multi-Family Tax Exemption (MFTE) with affordable housing requirement (RCW 84.14)	Not currently allowed under RCW, as of 2024	The County is actively studying MFTE to be ready to implement should the statutory situation change within the planning period
General funds (including levy lid lifts to increase funds available)	Not currently being considered.	No plans for implementation

Table 22. Local tools for addressing affordable housing funding gaps

