

Equestrian Facility Assessment Project: Code Compliance Complaint Summary

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Introduction

To identify reported situations which may inform the Equestrian Facilities project County Staff analyzed the County's catalog of code compliance requests and cases ranging from 2012 through November 2025 (when the data was accessed).

The initial search identified 679 requests and 588 cases over 565 properties. For context, a code compliance request differs from a code compliance case. A request is simply a complaint requesting potential action, while a case is a request that has been or is being processed by code compliance staff. Not all requests become cases. This analysis assessed both code compliance requests and cases.

The following search terms were used to sort through all code compliance requests and cases received from 2012-November 2025:

Equestrian, Horse, Stall, Stable, Manure, Rodeo, Horse Trailer, Barn, and Dust

Subsequent rounds of data refinement led to the identification of 8 code compliance cases which were analyzed in depth. This document summarizes the findings of the analysis of these 8 cases.

Complaint Themes

- Large Events
- Manure Management/Critical Area Degradation
- Commercial Use – Wholesale of Ag Products
- Commercial Use – Equestrian Facilities

Code Compliance Case Takeaways

Large Events

- Under KCC 17.445.060.I assembly events are limited to 200 attendees and 8 events per year. However, agricultural uses and agritourism activities (e.g., equine riding lessons, training clinics) are exempt from this 8-event limit.
- Noise & Parking Requirements: Events must provide on-site parking and comply with noise ordinances.

Manure Management/Critical Area Degradation

- Cases with critical areas and manure involved collaboration with agencies like the Kitsap Conservation District and the Kitsap Health District.
- In cases where manure was placed within wetland buffers or not being properly managed guidance was provided by these groups to move toward compliance.
- The Kitsap Humane Society was involved in a case with high animal density and manure complaints as well.

Commercial Use – Wholesale of Ag Products

- Enforcement Difficulties/Lack of Clarity:
 - 2023 Case - Staff closed the case without requesting action.
 - 2024 Case - Staff requested that the owner apply for an Administrative Conditional Use Permit (ACUP) for a moderate home business operation (selling hay and grain out of shipping containers and pole buildings on site).
- The distinction between [17.455.060](#) "Farm Stand" and [17.425.275](#) "Moderate Home Business" can be difficult to ascertain
 - Without obtaining receipts of purchase from sellers these percentages cannot be verified.
 - If the operation does not meet the above criteria it may fall under the moderate home business definition and require an ACUP depending on the zoning designation.

Commercial Use – Equestrian Facilities

- Use of Conditional Use Permits (CUPs) and Administrative Conditional Use Permits (ACUPs):
 - Previously CUPs were required to operate commercial stables, but this no longer applies in the current code.
- Historical meaning for "Commercial Stables":
 - A meeting summary from a 2002 code compliance case includes a meaning for "commercial stables" as established by County policy.

- o It states that a stable is considered commercial in nature when:

“Receiving money, services or other compensation for stabling animals on the property, sale or rental of tack or similar materials, and allowance for a professional or amateur trainer to educate any riders other than permanent residents of the property”

Equestrian Facility Complaint Analysis

Cases are listed in chronological order by the date which they were created.

Case #1 – Port Orchard

Parcel Number: --

Zoning: Rural Residential

Parcel Size: 9.38 acres

Year of Case Creation: 2018

Description (From Case):

“ADU, Horse Arenas, Horse Boarding facilities, regular horse events using loud speakers. [name removed] signs posted.”

Summary as it relates to Wholesale/Equestrian Facilities:

Staff determined that under KCC 17.455 event attendance is not to exceed 200 persons, and no more than 8 assembly events per year. However agricultural use accessory or agritourism definition includes equine riding lessons & training clinics even if they are charging for them and those do not fall under the 8 events per year requirement (that would be something like a wedding, or a special event, not something relating to and/or supporting the AG definition).

Staff explained that parking for the events needed to be provided on-site. Staff required the use of headsets or an alternative to the speaker system to address the noise ordinance.

Outcome:

Owner applied for Farm Workers permit to use the ADU for worker housing for 1 year. The case was closed.

Case #2 – Silverdale

Parcel Number: --

Zoning: Rural Residential

Parcel Size: 9.88 acres

Year of Case Creation: 2018

Description (From Case):

“Neighbor actively remodeling a barn to put in or start a horse boarding facility. They are selling hay out of semi-truck trailers, and they plan on boarding "a lot" of horses.”

Outcome:

Letter was sent requesting permit for the work to the barn. The case has been closed with the “Closed Status”.

Case #3 – Kingston

Parcel Number: --

Zoning: Rural Residential

Parcel Size: 2.57 acres

Year of Case Creation: 2023

Description (From Case):

“Building permit [permit number] granted in March 2000 allowed noncommercial use of a barn and horse arena. That horse arena and barn have been and continue to be used commercially to house outside horses, provide training and lessons for fees and rent.

We would like the owners to obtain the proper license and conform to commercial standards and guidelines for this business.

At the time the permit was granted the address was [address]. The county has renamed the street, so the new address is [address].”

Summary as it relates to Equestrian Facilities:

There is older code compliance activity for this parcel regarding a complaint of an unpermitted commercial stable from 2002 that led to a pre-application meeting requested by the property owner.

The meeting summary explains that the barn was permitted with a condition that the structure was approved for non-commercial use only.

The meeting summary includes a meaning for “commercial stables” as established by County policy in 2002 as:

“Receiving money, services or other compensation for stabling animals on the property, sale or rental of tack or similar materials, and allowance for a professional or amateur trainer to educate any riders other than permanent residents of the property”

In this 2002 case, the owner was required to obtain a CUP to continue commercial operations.

A CUP was not applied for as a result of the 2002 case. An SDAP was also required for additional grading, and this permit was approved.

Due to changes in the County’s agriculture code since 2002 the CUP requirement does not apply to code compliance today.

Outcome (of recent case):

A Code Compliance letter was sent for unpermitted clearing and grading activity. The letter requests that all clearing/grading activity is ceased and that required permits are obtained. The 2023 case is ongoing.

Case #4 – Silverdale

Parcel Number: --

Zoning: Rural Residential

Parcel Size: 9.88 acres

Year of Case Creation: 2023

Description (From Case):

“My concern is a large increase of horses over 34 and 7 cows , clients, hay sales on our private single lane dead end road. We live past [name] horse boarding facility at [address].

I’m concerned if fire safety/ protocol is being followed. We are concerned on how to get out if an emergency/ fire should happen next door. There are also several dead standing trees which concerns me.

Is there any regulations codes needed and are they checked for these commercial agriculture businesses like all businesses are? I’ve checked around and other horse boarding / hay sales facilities seem to being compliant , have they been compliant?

We live at [address] Please let me know, surrounding neighbors are concerned also and would like to know. Thank you [name]”

Summary as it relates to Wholesale/Equestrian Facilities:

Code Compliance Staff determined that selling hay or other goods from the lot which fall under the ag code does not constitute a violation. Regarding the road use, the access is a private road, and Kitsap County does not have Private Road Standards.

Outcome:

The case was closed in August 2024, the status is “Closed - No Violation”.

Case #5 – Olalla

Parcel Number: --

Zoning: Rural Residential

Parcel Size: 2.54 acres

Year of Case Creation: 2023

Description (From Case):

“Multiple complaints, listed as follows:

- Cleared vegetative barrier up to the fence
- No SW mitigation for barn or shop
- Does barn or shop have permits?
- Junk vehicles related to home business (towing company)
- Unpermitted home business (see above)
- Animal waste from horses
- Constant clearing and tree cutting, leaving ground bare with no BMPs
- Horse riding business being conducted at property”

Summary as it relates to Wholesale/Equestrian Facilities:

Staff visited the site and observed that the manure issue had been resolved as the owner had found someone to take the manure. The owner communicated that they are working with the Conservation District and were approved for a grant to assist with renovations on

the land, including the addition of gutters to the ag building. The owners confirmed that they do host horse riding lessons, and staff noted that it falls under agriculture use and would be allowed.

Outcome:

The case has been kept open to follow the permitting of an unpermitted garage/ag building. The case status is “In Permitting” and a permit has not been applied for.

Case #6 – Port Orchard

Parcel Number: --

Zoning: Rural Residential

Parcel Size: 9.38 acres

Year of Case Creation: 2023

Description (From Case):

“Caller would like to report that this property has around 58 animals on it. It used to be a horse boarding barn and they never had any issues with the previous owners who took care of the property. When it was sold in 2021, the new owners have not taken care of the animals at all.

There are 30 horses in the barn and about 10-15 cows in the pasture plus more horses elsewhere. The smell and flies were so bad this summer he called the Health District, and they came out and told the owners they needed to dump the manure every 10 days.

The HD was also investigating to see if there were any contaminants in [creek name] that runs in the back of the property as the livestock are encroaching on the creek.

The caller would like to know how many animals are allowed on a property and would like the County to investigate to see what can be done about this.

The HD referred him to Code for these issues. He would like a phone call after 3pm to discuss after the inspection is complete.”

Summary as it relates to Wholesale/Equestrian Facilities:

Collaboration with Kitsap Humane Society and Kitsap Health Department led this case to be closed. The Case Closure Summary states, “Case is being worked by Kitsap Health Department per [staff name]. He said he will contact me if there is anything code can do but as of now, he said health is handling it.”.

Case #7 – Port Orchard

Parcel Number: --

Zoning: Rural Residential

Parcel Size: 2.99 acres

Year of Case Creation: 2024

Description (From Case):

“Caller is stating the property owner is pushing manure to about 25ft off the wetland. There is no proper disposal for this waste.

K1 advised for the customer to contact the health district also. The property owner is also doing business on this property. He has a hay and grain business with trucks coming and going all the time.”

Summary as it relates to Wholesale/Equestrian Facilities:

Staff requested that the owner apply for an Administrative Conditional Use Permit (ACUP) for the moderate home business operation (selling hay and grain out of shipping containers and pole buildings on site).

Staff determined that manure was located too close to the onsite wetland and provided the number for the Conservation District. Staff requested that the owner contact the Conservation District to address the manure problem.

Outcome:

The case was closed in April of 2024. The case closure summary states: “Kitsap Conservation will be assisting [name] - case is closed”.

An ACUP has not been applied for.

Case #8 – Silverdale

Parcel Number: --

Zoning: Rural Residential

Parcel Size: 9.88 acres

Year of Case Creation: 2025

Description (From Case):

“We request an Investigation of a Commercial Retail Sales Yard of Feed/Forage/ Commercial Products Warehousing and Distribution Center [name] at [address], owner [owner name] [address] Zoned RR with 13 Single Family Rural Residences, along a shared Easement, on a Private Single Lane Road that dead ends.

Please help look into this negative impact and overuse of our neighborhood. Respectfully [names]”

Summary as it relates to Wholesale/Equestrian Facilities:

Staff visited the subject property to gain knowledge of the operations. A site visit report was prepared detailing the site visit and communication between staff and the property owners.

Outcome:

The case is closed with the “Closed - No Violation” status.