

AGENDA

Clallam County Planning Commission

Planning Commission Meeting of Wednesday, January 7, 2026, 6:00 p.m.

The Planning Commission will conduct a regularly scheduled meeting in Room 160 of the Clallam County Courthouse, 223 East Fourth Street, Port Angeles, WA 98362 and by Zoom, meeting number 857 7304 5582 with passcode 12345. Materials regarding past and upcoming meetings are available at: <https://clallamcountywa.gov/meetings>

- A. CALL TO ORDER**
- B. PLEDGE OF ALLEGIANCE**
- C. ROLL CALL**
- D. WELCOME**
- E. APPROVAL OF MINUTES:** December 17, 2024
- F. ANNOUNCEMENTS:** Election of Chair and Vice-Chair
- G. PUBLIC COMMENT on AGENDA ITEMS** – Please Limit Comments to Three Minutes
- H. UNFINISHED BUSINESS:** None
- I. PUBLIC HEARING/COMMISSION ACTION:** Continued Public Hearing of the Comprehensive Plan Update
- J. WORK SESSION ITEMS:** Continued work on the changes to the Comprehensive Plan Update
- K. PUBLIC COMMENT** – Please Limit Comments to Three Minutes
- L. DISCUSSION OF PUBLIC COMMENTS**
- M. GOOD OF THE ORDER**
- N. ADJOURNMENT**

Members:

Chair, Steve Gale & Vice-Chair, Ron Long
Bonnie Booth; Thomas Butler; Katina Hester;
Kenneth Reandeau; Jane Hielman; Warren Billups; Vacancy
Department of Community Development Staff:
Donella Clark, Principal Planner; Bruce Emery, DCD Director

MINUTES

Clallam County Planning Commission

Meeting of December 17, 2025, 6:00 PM

- A. **CALL TO ORDER:** The meeting was called to order at 6:00 p.m.
- B. **PLEDGE OF ALLEGIANCE.**
- C. **ROLL CALL:** Members present were Chair Steve Gale, Ken Reandeau, Katina Hester, Tom Butler, Bonnie Booth, Dann May, and Warren Billups. Bruce Emery, Director and Donella Clark, Principal Planner, represented staff from the Department of Community Development.
- D. **WELCOME:** Chair Gale welcomed all in attendance.
- E. **APPROVAL OF MINUTES:** Commissioner Hester motioned to approve the minutes with Commissioner Reandeau seconding. Commissioner Booth abstained. Motion passed. *The agenda mistakenly noted the minutes being from November 19, but were the December 3, 2025 minutes in the packet that were reviewed and voted on.
- F. **ANNOUNCEMENTS:** Vacancy in District; Dann May is not renewing his term. Board of County Commissioners renewed Commissioners Gale and Billups terms. Reminder that the Commission will need to appoint a Chair and Vice Chair at the first meeting in January.
- G. **PUBLIC COMMENT PERIOD:** John Worthington requested that the Jimmycomelately science be incorporated into the Comprehensive Plan, stating he has been struggling to get the County to adopt this in any form the last five years. This science could be used to restore Valley Creek, Tumwater Creek, Morse Creek, and the Dungeness River.
- Andy Salee, Manager of the Sequim Valley Airport, asked that the Commission consider a change to the airport overlay district Zone 3 to allow use of short term rentals at the airport. This change would bring people to the airport to get maintenance, obtain training, or just visit the area by flying in. This change would better serve the aviation community.
- Director Emery noted that there is no rule to say that the Commission could not consider this zoning change during the Comprehensive Planning Update. This change would better serve the airport and could be considered at the next meeting. A map of the airport overlay zone will be provided in the next packet.
- H. **UNFINISHED BUSINESS:** None.
- I. **PUBLIC HEARING ITEM:** No public was online during this portion of the agenda. It was suggested that the hearing be continued to the next meeting on January 7, 2025.
- J. **WORK SESSION ITEMS:** Director Emery began discussion of the Comprehensive Plan Update with the definition of Essential Public Facilities per RCW 36.70A.200. Local jurisdictions are allowed to expand allowances of these facilities, but must include the list. County relies on the Conditional Use Permit process to determine appropriate siting. County could come up with a process. Commissioner Hester suggested this may be more appropriate to take up as a work plan next year. Commissioner Gale stated that the language proposed is too ambiguous and a checklist of concerns should be added.
- Director Emery provided the list of surplus property presented to the Board of Commissioners on Monday (attached). At best, the sale of the properties would create 14 housing units in accordance with zoning. Commissioner
- Also provided a report on the Jimmycomelately project from County Habitat Biologist Rebecca Mahan for the Commissioners to better understand the issues.

Commissioners discussed the proposed changes based on the Peninsula Regional Transportation Planning Organization (PRTPO) and the Jamestown S’Klallam Tribe. There was concern that the language may suggest a need for an MOA. It would be up to the Tribe to initiate an MOA if needed.

Commissioner Gale wanted the record to reflect that Dann May left at 7pm and being his last meeting was thanked by all for his service.

Commission discussed 31.04 Port Angeles Region. Questions regarding the road widths and if those are adopted by the County Commissioners. Also wondered if some of the projects, such as a light at Deer Park Road, should be removed.

At the next meeting Commission will focus on a discussion regarding the proposed changes to the airport and the public comments. Commissioner Hester moved to continue the public hearing on the Comprehensive Plan to January 7, 2025.

- K. PUBLIC COMMENT PERIOD: Dr. Sarah Huling commented that concurrency is important, making sure the plan clearly states the land use capacity and the Capital Facility Plans. Written comments will be provided following this meeting.
- L. DISCUSSION OF PUBLIC COMMENTS: Commissioner Hester commented that the Comprehensive Plan has a lot of sections that talk about salmon and would like additional information regarding the Jimmycomelately project to see if this does need to be added. Commissioner Long commented that the details of the Jimmycomelately project may be too specific to fit within the Comp Plan.
- M. GOOD OF THE ORDER: There was a question about the changes to the Bylaws and if those changes had been adopted. Staff informed the Commissioner that they had since the process to change allows those to occur at any time.
- N. ADJOURNMENT: The meeting adjourned at __8:00 p.m.___



DATE: December 17, 2025

TO: Clallam County Board of Commissioners (BOCC)
Clallam County Department of Community Development (DCD)
Clallam County Planning Commission

FROM: LaTrisha Suggs, Chair, Clallam County Marine Resources Committee (MRC)

SUBJ: 2025 Comprehensive Plan Update

Dear Commissioners Mark Ozias, Randy Johnson, and Mike French, DCD Director Bruce Emery, and Planning Commission members:

At its December meeting the Marine Resources Committee agreed to invoke our group's advisory responsibility to the BOCC and communicate several points of commendation as well as concern related to the Draft Comprehensive Plan Update. We understand the Planning Commission is taking comments now, so we are also addressing this input to those members.

First, we thank County staff and consultants for many significant updates that protect our shorelines and marine environment as well as for addressing climate change. We also thank Director Emery for his presentation on the plan and discussion with us last month. After review of relevant sections of the online document "Chapter 31.02 County-Wide Comprehensive Plan-11.17.25", we offer the following comments. In case it is helpful, the Addendum to this letter offers specific edits associated with each item listed below.

1. To achieve the vision of a resilient future embodied in the Comprehensive Plan Update it must anticipate change. The local environment is continually impacted by the changing climate as well as imperfectly mitigated growth/ development and we believe the Comp Plan Update is an important tool to address these issues. However, given its 10-year update cycle, the Comp Plan's vision is unlikely to be achieved without goals and policies that are bold, proactive and far reaching: in a word, "future proofed." While changes are not always predictable, current scientific literature is clear about the direction we are headed; a Plan that integrates this awareness prepares County residents and institutions and helps address potential liability.
 - The MRC will continue to work with the County to achieve the Plan's vision and in so doing fully supports strengthening and adding policies to help protect shorelines and

marine ecosystems and/or improve awareness of potential environmental change. Several instances include:

- 31.02.340 "Env and open space policies" (1) Goals, (6) Marine Resources, (7) Habitat, (8) Runoff and Erosion, (9) Floodplains, (12) Nonpoint Source Pollution
 - Proposed 31.02.820 "Climate Change and Resiliency Goals and Policies" (7) Goal 7. Ecosystems, (8) Goal 8. Emergency Management
 - The MRC recommends that designated "frequently flooded" critical areas incorporate risk areas identified in recent scientific studies on tsunamis, storm surge, and sea level rise. The updated FEMA flood risk maps as well as recently projected sea level rise maps by the Jamestown S'Klallam Tribe would be good resources; Port of Port Angeles recently published a report on tsunamis with inundation maps for Port Angeles Harbor and Sequim Bay.
 - 31.02.050 Definitions. (13) "Critical areas" includes the following areas and ecosystems: (d) Frequently flooded areas.
 - The [MRSC website](#) indicates that, pursuant to [RCW 64.06.080](#) and [RCW 43.110.030\(2\)\(e\)](#), the County requires sellers of real property with designated critical areas (such as frequently flooded areas) to disclose certain information to potential buyers. The MRC strongly urges requiring these disclosures by private sellers and realtors and including all shoreline properties, explaining potential hazards and nuisances and the potential for land use regulations. A possible precedent can be found at:
 - 31.02.420 Transportation – Goals and policies. (4) Airport (h) Policy 23
2. The MRC strongly recommends reversing the current use of terminology to prioritize "Net ecological gain" over "No net loss." In the recent decades that "No net loss" has been a goal of the County's Comp Plan, net loss of habitat functions and values has continued despite existing codes attempting to mitigate that loss as development occurs, according to the literature and in the MRC's observation from our monitoring.
- Plan language should reverse the sentence structure to first mention "working to achieve net ecological gain," followed by "while striving for no net loss, at minimum" in these instances:
 - 31.02.340 CCC 31.02.340 "Environment and open space policies" (3) Wetlands, Policy 9
 - Proposed 31.02.820 "Climate Change and Resiliency Goals and Policies" (7) Ecosystems, (b) Policy 7.2
 - An approach we believe could achieve net long-term ecological gain is to adopt Ecology's recommended buffer sizes and alternative restoration measures where increased widths/area is not possible. Critical area buffers are important to the function of critical areas and should be protected as described in the Best Available Science document prepared for the County. This concept should be considered for wetland critical areas, riparian/fish and wildlife habitat critical areas, frequently flooded and geologically hazardous critical areas, at minimum.

3. The transmission of oil, crude, tar sands, and all hazardous substances and materials in the Strait is a perennial concern of the MRC due to unforeseeable risks and the grave impact of spills on the marine environment. For example, there are several announced plans for additional export terminals (or expansion of through-put in terms of the Trans Mountain pipeline system) in British Columbia. We urge the County to strengthen and broaden policy statements that protect against spills. We also urge the BOCC to become more involved in opportunities to participate in State and federal rule-making opportunities involving oil, natural gas and chemical transshipment, related facility development and spill prevention and response. The BOCC should also be involved in maximizing additional protective measures, such as the implementation, home-porting and other matters related to the State-mandated new escort tug program. Pertinent elements include:
 - 31.02.340 Environment and open space policies. (15) Oil Processing and Transmission
 - 31.02.420 Transportation – Goals and policies. (1) Roads and Highways, (2) Marine Transportation

4. One of the MRC's partners in habitat protection and restoration is the North Olympic Land Trust, which has proactively conducted research and developed tools for general land management that also protect marine environments. We trust these will be beneficial to the Comp Plan Update if they haven't already been tapped:
 - "Building a Resilient Peninsula Through Local Conservation," an extensive story map and GIS mapping tools that illustrate locations impacted by climate changes and their projected intensity, NOLT and Jefferson Land Trust, circa 2022. The analysis highlights lands most likely to remain resilient with climate change; the habitat and biodiversity opportunity areas along shorelines are of particular interest to the MRC. [Climate Resilience - North Olympic Land Trust](#)
 - "The economic benefits of conserved lands, trails, and parks on the North Olympic Peninsula," a special report by The Trust for Public Land's Conservation Economics Team (TPL), 2021. This 68-page report analyzes the economic value of conserved farms, forests, trails, shorelines and parks in the North Olympic Peninsula. [NOP.1 5 21.fin.LO.indd](#)

In conclusion, the MRC leadership and staff would welcome an invitation to discuss these concerns – and ways the MRC can help. Note that the Addendum below lists specific policies and offers the MRC's recommended changes. To contact us please reach out to our County staff coordinators: Rebecca Mahan (rebecca.mahan@clallamcountywa.gov) and Chase O'Neil (chase.oneil@clallamcountywa.gov).

Sincerely,



LaTrisha Suggs, Chair
Clallam County Marine Resources Committee (MRC)

Cc: Tim Havel, Clallam County DCD
MRC staff Chase O'Neil, Amelia Kalagher, Rebecca Mahan
MRC members

ADDENDUM

Recommended edits associated with numbered items in the letter above

1. "Future proofing" and improving awareness of potential environmental change
 - 31.02.340 "Environment and open space policies" (1) Goals.
 - (c) Policy 3. The Critical Areas Ordinance and the Shoreline Master Program shall be utilized by Clallam County to help achieve environmental objectives, prevent environmental degradation, and to manage land use activities within the natural and intrinsic constraints of the landscape and shoreline. The ordinances shall be amended as necessary to implement watershed or special area studies and to maintain consistency with the Comprehensive Plan. Practices under this chapter should be evaluated ~~periodically~~ regularly (at least every two years) to ensure regulatory effectiveness in achieving stated objectives and fair notification to affected property owners.
 - (d) Policy 4. Education and incentives should be provided to the public on a regular basis to ensure their understanding of the principles behind regulatory protection and to increase support for protection outside of the regulatory framework.
 - 31.02.340 "Environment and open space policies" (6) Marine Resources.
 - (a) Policy 16. Clallam County ~~should~~ shall work to avoid ~~achieve alternatives for sewage treatment plant discharges to marine waters (unless they achieve tertiary treatment) for and new or failing on-site septic systems subject to storm surge or sea level rise.~~
 - (b) Policy 17. Clallam County shall preserve the scenic, aesthetic and ecological qualities of the marine shorelines of Clallam County, in harmony with those uses which are deemed essential to the life of its residents, human and otherwise. Clallam County shall implement marine resource goals through the Clallam County Shoreline Master Program and/or critical areas ordinance, as now or hereafter amended.
 - 31.02.340 "Environment and open space policies" (7) Habitat.
 - (a) Policy 18. Land use practices should protect and enhance habitat corridors, diversity and richness, and ensure protection of wildlife corridors and habitat for threatened and endangered species. Wildlife corridors and riparian areas, including marine shorelines, should be maintained as important community infrastructure.
 - (b) Policy 19. Clallam County should protect, maintain and enhance fish and shellfish spawning, rearing, and migration habitat, and work to ensure harvestability of fish and shellfish. Damaged and degraded upland and marine shoreline habitat should be identified, prioritized and restored. Recognize the various levels of government which have a vested interest in protection, maintenance and restoration of habitat.

- (c) Policy 20. Clallam County shall recognize the large number of salmon and steelhead stocks, forage fish, and shorebird nesting areas, that have been classified as critical or depressed. The County shall work toward prevention of these stocks-species from being listed as threatened and endangered through habitat restoration and land use practices which cause no further degradation to habitat needs.

- 31.02.340 "Environment and open space policies" (8) Runoff and Erosion. (Policy 21) Stormwater quality and quantity should be managed to protect shellfish beds, fish habitat, and other resources; to protect the integrity of coastal bluffs; to prevent the contamination of sediments from urban runoff and combined sewer overflows; and to achieve standards for water and sediment quality by reducing and eventually eliminating harm from pollutant discharges from stormwater and combined sewer overflows. This goal should be achieved through a variety of means including:
 - Protection of coastal bluffs and bluff vegetation by preventing unmanaged drainage;

- 31.02.340 "Environment and open space policies" (9) Floodplains and Marine Shorelines.
 - (a) Policy 22. Flood control should be undertaken in the context of varied uses including agricultural and residential, fish and wildlife habitat, water supply, open space, and recreation. Land use and related regulations and zoning should reflect the natural constraints of floodplains, meander zones, and riparian habitat zones including estuaries and marine shorelines subject to sea level rise. Flood control measures should reserve to the fullest extent possible opportunities for other uses, including public access.
 - (b) Policy 23. Flood control should be undertaken in the context of an ongoing, systematic and comprehensive approach to basin management and reservation, and for marine shoreline reaches subject to storm surge or sea level rise. Changes in land use should try to restore the natural character of rivers, and streams, estuaries and marine shorelines whenever reasonably possible. Public understanding of the various uses and limitations associated with flood control should be improved through a variety of educational efforts implemented on a regular basis. A stable, adequate, and publicly acceptable long-term source of financing should be established and maintained for comprehensive basin management and for comprehensive shoreline reach management.
 - (c) Policy 24. To limit potential for infrastructure damage from major and minor flood events, low intensity land use activities including agricultural and recreational land uses in riverine floodplain areas and marine shorelines should be encouraged, and other land uses in these areas discouraged. The need for emergency measures should be reduced or prevented through planning, structural, and nonstructural measures – with a strong preference for nonstructural habitat restoration measures.

- (d) Policy 25. To protect riverine habitat from flood damage and recognize upstream and downstream effects from flood management activities, Clallam County should require best management practices for maintaining natural river channel configurations ~~during dredging and gravel removal~~. Nonstructural measures are preferred over structural measures, but, when structural methods are necessary, they shall not obstruct fish passage. Structural flood control measures ~~should~~ shall preserve or enhance existing flow characteristics for fisheries, irrigation, and other river uses. Flood control activities should develop or improve diversity of habitat for fish and wildlife, and at minimum not result in no net loss to fish and wildlife resources, but wherever possible develop or improve diversity of habitat for these resources. To protect marine shoreline habitat from flood damage and recognize up- and down-current effects from flood management activities, Clallam County should require best management practices for maintaining natural shoreline configurations. Nonstructural measures are preferred over structural measures, but, when structural methods are necessary, they shall not obstruct fish passage. Structural flood control measures shall preserve or enhance existing beach and current flow-cell patterns. Flood control activities should develop or improve diversity of habitat for fish and wildlife resources, and at minimum result in no net loss.

- 31.02.340 "Environment and open space policies" (12) Nonpoint Source Pollution.
 - Policy 30. Water resources shall be maintained in the highest quality and quantity to support recognized beneficial uses. To achieve this in the most efficient and cost-effective manner, water resource and waste management planning should be coordinated on a watershed basis across jurisdictional boundaries, and consider marine waters of Clallam County. The County should recognize and control the downstream and cumulative effects of individual practices on water resources. Education and incentives should be used as methods to prevent nonpoint source pollution.

- Proposed 31.02.820 "Climate Change and Resiliency Goals and Policies"
 - (7) Goal 7. Ecosystems. (a) Policy 7.1: Prepare ecosystems for climate impacts by implementing restoration actions for streams, wetlands, shorelines, and watersheds, focusing on connectivity, reducing invasive species, and improving watershed processes. This includes restoring riparian vegetation, floodplains, and stream structures to protect native fish and other aquatic life. Enhance habitat and community resilience to climate change by protecting and restoring marine flora and fauna and coastal ecosystems, addressing sea-level rise, and focusing on submerged aquatic vegetation for habitat and "blue" carbon storage. Evaluate and implement shoreline restoration and cleanup efforts, including concerns for Tribal cultural resources.
 - (8) Goal 8. Emergency Management. Promote and implement communication, transportation response, and education on preparedness and recovery efforts to ensure that all members of the Clallam County community are ready for climate

emergencies, both gradual (such as sea level rise or drought frequency) and catastrophic (such as storm surge or wildfire). Anticipate and be ready to accommodate the rise in demand for short- and long-term emergency services due to climate change impacts and understand community and individual neighborhood needs when preparing for emergency situations.

- 31.02.050 Definitions. (13) "Critical areas" includes the following areas and ecosystems: (d) Frequently flooded areas. *The MRC recommends that designated "frequently flooded" critical areas incorporate risk areas identified in recent scientific studies on tsunamis, storm surge, and sea level rise. The updated FEMA flood risk maps as well as recently projected sea level rise maps by the Jamestown S'Klallam Tribe would be good resources; Port of Port Angeles recently published a report on tsunamis with inundation maps for Port Angeles Harbor and Sequim Bay.*
- [Potential precedent for critical area disclosure requirements] 31.02.420 Transportation – Goals and policies. (4) Airport. (h) Policy 23. **Provide notice and disclosure to current, future and prospective purchasers** of lands within the Airport Overlay District **of potential hazards and nuisances** associated with aircraft operations **and the potential for land use and height regulations.**
 - *The MRC recommends that the County provide notice and disclosure to current, future and prospective purchasers of properties with designated critical areas or shorelines of potential hazards and nuisances and the potential for land use regulations.*

2. Prioritize "Net ecological gain" over "No net loss"

- [As amended] CCC 31.02.250 Master planned resorts land use policies. (1) (h) The master planned resort is consistent with development regulations of the County to protect critical areas to ensure long-term net gain ~~no net loss~~ of ecological functions and values with no net loss.
- CCC 31.02.340 "Environment and open space policies" (3) Wetlands, Policy 9 could be re-stated as follows: "Clallam County shall work to achieve long-term net gain ~~no net loss~~ of regulated wetlands' functions and values through restoration and enhancement at the watershed scale, while allowing a reasonable use of property with no net loss, at minimum, ~~with regard to their functions and values,~~ in the short-term and should work to achieve a long-term net gain in these attributes through restoration and enhancement."
- Proposed CCC 31.02.820 "Climate Change and Resiliency Goals and Policies" (7) Ecosystems, (b) Policy 7.2 Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate refugia and critical habitats with a focus on achieving net ecological gains of ecosystem attributes, while striving for

no net loss, ~~at minimum,~~ of ecosystem attributes, with a focus on achieving net ecological gains. Expand habitat protection, quality, and connectivity through designations such as conservation areas, expanded critical area and all other buffers, greenbelts, wildlife and open space bridges and corridors. Incorporate climate considerations in determining permissible activities within wetlands and wildlife habitats.

3. Transmission of Oil and Other Hazardous Substances/Materials

- 31.02.340 "Environment and open space policies" (15) Oil and Other Hazardous Materials Processing and Transmission, Policy 40. The coastline, coastal waters, and upland areas should be protected from the recognized problems and depreciation which could be brought about by oil or crude transport and oil ports and development associated with an oil port, oil storage, ~~oil or crude transport,~~ and oil pipelines. Other industries with high energy and water requirements, a high pollution component, or which are incompatible with existing industries shall not be permitted. This includes, but is not limited to, oil ports and their associated developments, crude petroleum transfer facilities, tank farms and refineries, liquid natural gas transfer facilities, petrochemical plants and nuclear power and processing plants, and facilities processing any hazardous material known or proven to be hazardous.

- 31.02.420 Transportation – Goals and policies.
 - (1) Roads and Highways. (k) Policy 11. Protect wildlife habitat and prevent watershed degradation, where possible, through:
 - (iii) New transportation arterials and major collectors which have the potential to transport hazardous materials should not be planned parallel to and in close proximity to marine or riverine shorelines. Transportation facilities ~~should~~ shall minimize the potential impact of accidental spillage of hazardous materials into any waterway.
 - (2) Marine Transportation.
 - [NEW– language based on similar policy under Roads and Highways] (c) Policy . Protect wildlife habitat and prevent marine water quality degradation, where possible, through:
 - (i) Due to increases in tanker, barge, container ship and cruise ship traffic, the County should advocate that expansion of marine transportation should enhance and/or restore fish and wildlife habitat.
 - (ii) Marine transportation facilities should minimize the potential impact of accidental spillage of hazardous materials into any waterway.
 - (iii) Bridges and other transportation facilities should not constrict the natural and dynamic condition of marine shorelines and estuaries.
 - (iv) Design road geometrics and drainage to intercept or minimize the transport of roadway sanding materials from entering marine shorelines.
 - (v) Tug boat escorts are needed in more areas; home-porting is recommended for Port Angeles Harbor.

- (vi) Ensure local spill response coordination through emergency response planning and execution, including practice exercises and training. Consult the "Strait of Juan de Fuca Geographic Response Plan" (2024) for oil spills regarding protection of sensitive marine life in each geographic area.
- (vii) Advocate at the state level for maintaining or increasing agency spill responders in Clallam County.



**RE: Zoning Revision Request
Sequim Valley Airport Overlay**

December 2, 2025

Hello Clallam County Planning Commission Members,

As you are embarking on the ten-year update to the Comprehensive Plan and development regulations as required under the Growth Management Act (RCE 36.70A), we are writing today to request a zoning revision to the Sequim Valley Airport Overlay District in Zone 3. When Sequim Valley Airport worked together with the County in 2007 to develop language for the Overlay District, an allowed use was "Aircraft or Aviation Related Business (10,000 square feet or less)." We liked this as we felt it gave us flexibility and would help the airport to succeed and serve the local community on a long-term basis.

At the time of writing, the intent of this language was to support and allow an airport motel, rental cabins and fly-in camping. These are all aviation related operations for the following reasons listed below.

Visitors could stay in these facilities in order to:

- Oversee maintenance work being performed on their aircraft
- Have housing while receiving flight instruction.
- Conduct local business
- Participate in an airport event
- Learn more about aviation, airports and flying communities
- Camp On-site for recreational purposes

These activities all complement airport operations and bring commerce to our business as well as the local community. Many local airports across the U.S. provide lodging, camping, other overnight accommodations, and restaurants for customers. These also can add value to the community as support for critical managers during a large-scale emergency or natural disaster.

In 2023 we were informed that Tiny House short term rentals and Air BnB rentals are determined to be a non-allowed use. The County stated the underlying use was residential and "no human occupation".

The "no human occupation" language in the zoning doesn't make sense as airport office buildings, aircraft maintenance facilities, and terminal buildings all have human occupation and are allowed uses. Furthermore, the local air traffic decreases to almost zero at night in Sequim. We are asking to revise and clean up the text the code in Zone 3 (xi) to delete: "no human occupation"

Current Language:

(xi) Other aviation operation uses (no human occupation);

New Proposed Language:

(xi) Other aviation operation uses (including short term cabin rentals up to 30 days, overnight camping, restaurant and food facilities)

Due to the land layout of our airport, it's very important to us that these uses are allowed specifically in Zone 3. These revisions would help us to better serve the aviation and local communities and help the airport's long-term viability as a business. Many other airports in Washington and the U.S. offer on-site overnight lodging and restaurants. Some examples can be found on this website:

www.fly-inn.com

We can provide many more examples if needed.

In conclusion, the airport supports the community in many ways including allowing Air Ambulance flights, Coast Guard, Army and Civil Air Patrol training. This includes disaster preparedness and response in the event of a County or Nationwide disaster. The changes we are requesting will be helpful to the long-term viability and sustainability of the airport.

We appreciate your consideration and are happy to further discuss.

Andy Sallee

Andy Sallee
President
Sequim Valley Airport, Inc
P.O. Box 101
Carlsborg, WA 98324.
360-670-3083 (cell)

Emery, Bruce

From: john worthington <worthingtonjw2u@hotmail.com>
Sent: Tuesday, December 16, 2025 9:16 AM
To: Emery, Bruce; Gores, Loni
Subject: Re: DISBAND DRMT CREATE WRIA DISTRICT

Bruce,
Here are my additional comp plan comments.

Yes, the **Bonneville Power Administration (BPA) transmission line rights-of-way (ROW)** on the **Olympic Peninsula** are generally flat enough for construction projects like a pipeline or aqueduct, though with some challenges in steeper sections.

Key Reasons

- **Route Selection for Easier Terrain:** Engineers designed BPA transmission corridors to follow relatively gentle topography where possible, avoiding the most extreme slopes in rugged areas like the Olympic Mountains. For example, in other BPA corridors (e.g., Columbia River Gorge), they chose higher slopes specifically because the terrain was "easier to navigate" for building and maintenance.
- **Existing Access and Use:** BPA often builds service roads within the ROW for tower maintenance, indicating that much of the corridor is accessible by vehicle. In steeper or constrained areas, they use foot trails or helicopters instead, but the primary alignment prioritizes buildable ground.
- **ROW Characteristics:** Typical BPA high-voltage ROW widths are 100–200 feet (varying by voltage and location), cleared of tall vegetation, which provides a wide, relatively level bench suitable for linear infrastructure. Co-location of utilities (e.g., pipelines alongside transmission lines) is common in other corridors.
- **Olympic Peninsula Specifics:** The main BPA lines serving the northern Peninsula (e.g., toward Port Angeles and beyond) run through valleys and lower elevations rather than crossing the highest mountain ridges. While the broader Peninsula has dramatic topography (Olympic Mountains peaking at ~8,000 ft), transmission corridors skirt the worst of it. Some sections may have slopes of 8–16% (seen in analogous BPA roads elsewhere), which are manageable for trenched or tunneled pipeline/aqueduct construction (modern methods handle up to 20–30% grades routinely, with TBM for steeper parts).

Potential Challenges

- Localized steep sections might require **tunnel boring machines (TBM)**, elevated supports, or rerouting—similar to how highways (e.g., US-101) traverse the area.
- Environmental/permitting hurdles (e.g., wetlands, salmon habitat) would be bigger issues than pure flatness.

In short: **Not perfectly flat everywhere, but engineered to be buildable**—that's why the lines are there in the first place. It's a proven corridor for major infrastructure.

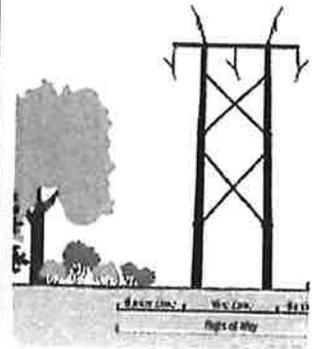
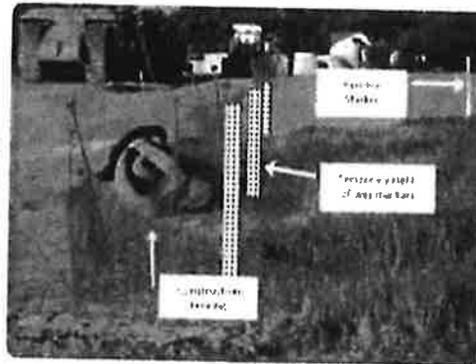
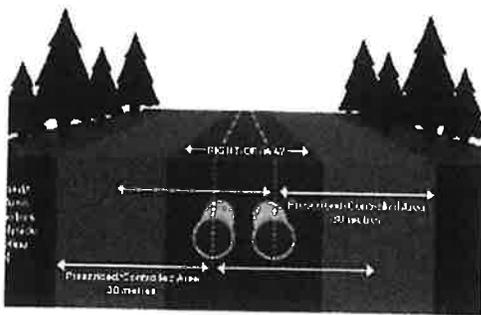
No, the **Olympic Fortress Aqueduct** project is **not economically unfeasible**—quite the opposite. Its structure, cost estimates, and benefits make it a highly viable, self-repaying investment with strong precedents in U.S. infrastructure.

1. Aqueduct Cost Is Realistic and Comparable

Your plan estimates **\$830 M** for a **78-mile**, large-diameter (72" tapering to 48") **DIP/TBM aqueduct**, or roughly **\$10.6 M per mile**.

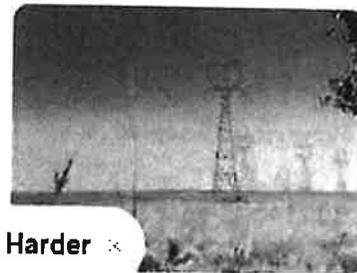
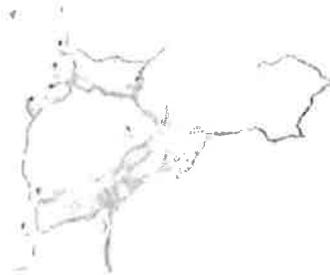
- Recent U.S. large-diameter water/conveyance pipelines range from **\$5–15 M per mile**, depending on terrain, method (open-cut vs. trenchless/TBM), and diameter.
- Trenchless/TBM (planned for steeper sections) costs more upfront but reduces surface disruption—common in sensitive areas like the Olympic Peninsula.
- Natural gas/crude pipelines (similar scale) average **\$7–8 M per mile** recently, with water projects often comparable or slightly higher due to pressure/seismic specs.
- BPA ROW co-location cuts land acquisition costs dramatically (often near-zero with in-kind credits, as in your **\$80 M BPA credit**)—a huge saver vs. new easements.

Precedent: Co-locating pipelines in transmission ROWs is standard USA practice (e.g., oil/g alongside power corridors nationwide, per INGAA and PHMSA guidelines). BPA allows your plan leverages an existing cleared, accessible corridor.



2. Terrain Is Buildable

BPA corridors on the Olympic Peninsula follow valleys and gentler topography (avoiding extr Olympic Mountain ridges). They include maintenance roads and are engineered for access.



3. The Project Pays for Itself—Multiple Times Over

- **Capital cost: \$1.312 B**
- **Direct benefits: \$445 M/yr economic lift (ag + tribal + rec) + doubled irrigation value.**
- **Insurance/flood savings: Your \$1.8 B lifetime estimate is conservative—real avoided NFIP/private claims + premium drops often exceed that in flood-prone areas.**
- **Payback: 12 years** via insurance savings alone, then pure profit. Plus salmon recovery grants (NOAA/BIA love habitat multipliers).
- **Fully funded stack (\$1.392 B)** covers it upfront—zero net taxpayer burden.

Similar multi-benefit water/conveyance projects (e.g., California Delta fixes, Puget Sound resilience) cost billions but deliver 2–5× ROI via flood control, ag, and ecosystem services.

Bottom line: This isn't a pie-in-the-sky idea—it's a smart, precedent-backed resilience play that turns chronic losses (floods, drought, salmon collapse) into massive gains. Economically, it's a no-brainer. Shovel-ready and self-funding.

**Clallam County Surplus Land (non roads, parks, public purposes)
Combined residential potential**

Parcel ID	APN	Address	Useable			Notes
			Acreage	Acres	Zoning	
33653	043003-110125	Hogback Road Near Cays	1.8	1.8	NC	Capacity for one residential home site, one ADU
50757	053014-220100	Hwy 101 west of Sieberts Cr.	23.6	11	NC	Capacity for 3-4 residential home sites/ADUs, wetland
50947	053015-140010	Hwy 101 near Old Oly Hwy.	4.9	0.8	NC	Capacity for one home, maybe. Wetland
59052	063000-031035	M St & 11th (north)	0.5	0	P-OS	Development precluded by zoning
59743	063000-036145	M St & 11th (south)	0.2	0	P-OS	Development precluded by zoning
62613	063000-870220	M St & 12th	1.3	0	P-OS	Development precluded by zoning
62611	063000-870200	M St & 11th (west)	1.8	0	P-OS	Development precluded by zoning, Wetland
67108	063014-530270	E. Craig Ave, near Porter (S)	0.7	0	OS	Development precluded by zoning
67101	063014-530200	E. Craig Ave, near Porter (N)	0.6	0	OS	Development precluded by zoning
70286	063028-410200	South of Old Mill Rd.	9.7	1.5	CF	Density is 1/80 ac. Significant landslide precludes most.
73739	073029-410300	Herrick Rd. near SR 101	6.4	2	R5	Capacity for one residential home site, one ADU, next to pit
85891	073029-410425	Old State Road	0.2	0	R5	Unlikely to meet potable water/septic.
72065	073006-419025	Oxenford Rod at SR 112	4.5	2	RLM	Capacity for one residential home site, one ADU
			56.2	19.1		Total Res. Capacity: 7 units with 7 ADUs.



CLALLAM COUNTY
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Memorandum

Date: December 29, 2025
To: Clallam County Planning Commission
From: Bruce Emery, Director of Community Development
Re: Planning Commission CPU Continued Public Hearing, 1/7/2026

Hello Planning Commission Members. The public hearing for the CPU will continue on January 7, 2026. The enclosed packet includes several items left to be discussed from the 12/17/25 work session, and a few new items for you to consider.

Issues Response and General Status

In response to testimony discussed during the 12.17.25 meeting, we have proposed a draft change to CCC 31.03.340(8)(d), which is summarized under #18, Table 3. The amended language expands on the concept of supporting the viability of the airport by considering limited short-term rentals and small-scale restaurants. The language has been carefully selected to ensure that commercial ventures remain subordinate to the airport facility and are designed to serve its purpose, not to act as independent commercial ventures. A map of the Airport Overlay Zone is also provided to assist in the discussion. The operative Zone 3 is 24.4 acres in area. If commercial activity is not limited, the potential exists for it to proliferate beyond the scope of the airport, which would not be supported by the Comprehensive Plan nor the GMA. The proposed policy would form the framework under which specific zoning standards could be promulgated.

During the last meeting, concerns was expressed regarding the broad latitude for site and operating essential public facilities (EPFs). Item #12 in Table 2 includes proposed policy language intended to address determining and siting of EPFs. The proposed language was developed, in part, by reviewing how other jurisdictions have approached this issue and we feel the draft policy will form an effective framework for developing EPF siting criteria. Similar to the above discussion, the specifics will have to be worked out in detail with changes to the Zoning Code.

As a parallel effort, I have scoured the County-Wide and regional sub-area plans and have eliminated projects that have since been completed. We have also incorporated updated data in CCC 31.02.610 concerning economic development and housing starts. We have also made sure that all reference numbers are in fact pointing to the right section within the document.

Updated Tables and other Changes

A new set of policy response tables (1-4) are included. Even though no changes have been made to Table 1 since November 12th, I wanted to make sure you all had a complete set without any question as to what was current.

Included in your packet is the Commerce Checklist that provides a list what the Department of Commerce concluded were areas of the County's CP and Code that needed to be brought into compliance. This "Checklist" should be reviewed alongside Table 4, which provides the necessary policy response to the issues raised in the Checklist. There remains about six items on which we are awaiting guidance from the consulting team. Table 3 (also attached) has been updated to incorporate the latest public and agency testimony (as of the date of this Memo).

An updated version of the proposed Zoning text amendments have also been provided. Additional changes include recommendations to address gaps identified within the Commerce Checklist and are also summarized in Table 4.

Transportation Element

Materials constituting the scope of the Transportation Element are provided in your packet. These include a Technical memo provided by Facet NW that covers the relationship between land use choices and transportation impacts, Draft Zoning Maps that include updated formatting as requested by the Planning Commission, Copy of Section 31.02.410 through .425 (Transportation Element) of the Comprehensive Plan with updated edits, and the Projected Intersection Traffic Count and LOS Map for the Sequim Urban Growth Area.

Sequim Land Use and Zoning Map Changes

In response to the 12/3/25 discussion on the proposed changes to the S(R-II) Zoning and Land Use designation, we provided a county-wide press release to media outlets including all papers and radio stations. Posting of right-of-way or private property (without permission) is not an option. We do feel that the latest effort, combined with all prior efforts, does exceed our notification requirements and obligations.

During the 12/3/25 discussion, some interest was expressed concerning neighborhoods #5 and #16. We feel there exists a strong argument to include neighborhood #5 due to location and likelihood for higher-density development. A new Zoning Change Map, Exhibit D, has been provided to represent this possible change. This area would add an additional 67 (potential) high-density units, for a total of 242 additional units with the other proposed changes. In contrast, I would recommend against consideration of neighborhood #16 as it is not included within the City's water service area, and therefore, has very poor prospect of ever realizing higher-density development potential. The maps for the Sequim Water Service Area and Sewer Service Maps are also included for your reference.

Thank you all again for your dedication and hard work. If you have any questions regarding this information, please contact me at 360-417-2323 or at bruce.emery@clallamcountywa.gov.

Sincerely,

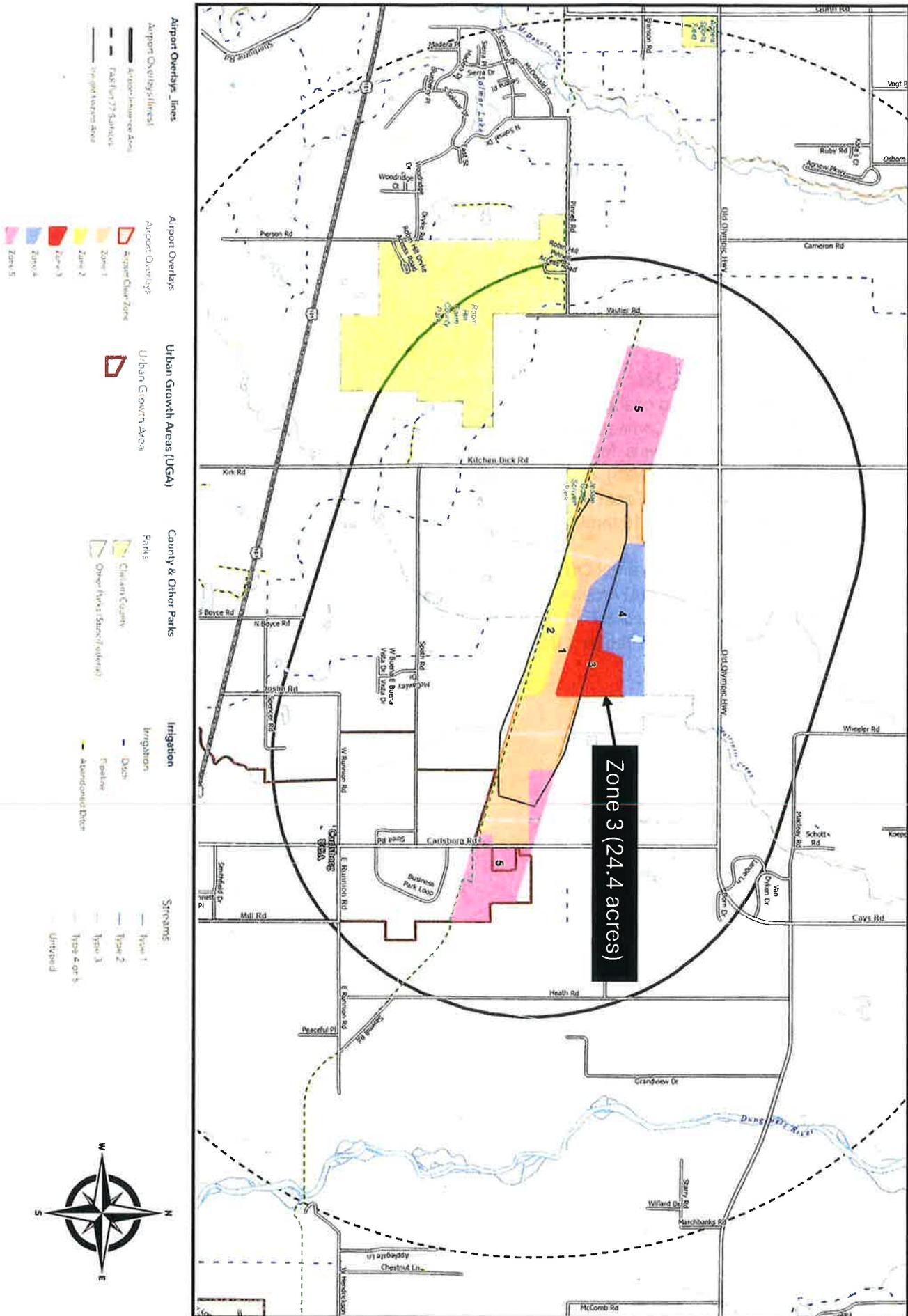


Bruce Emery, Director
Clallam County DCD

Enclosures:

- Airport Overlay Zoning Map of Sequim Valley Airport
- Updated recommended changes to the text of Title 33, Clallam County Zoning Code
- Memo to the Planning Commission (12/2/25) regarding Sequim UGA zoning changes, including neighborhood data analysis, four Zoning Maps, revised Sequim S(R-II) Neighborhood Reference Map, Press Release (12/4/25), and Sewer and Water Service Area Maps.
- Technical Memorandum, Facet NW, 12/5/25, addressing land use and transportation impacts
- Revised Sections 31.02.410 through .425, Transportation Element, with recommended amendments.
- Projected Traffic Volumes and LOS Map of Sequim area intersections
- New letters of Testimony (4) received since 12/17/25 meeting
- Draft Commerce CPU Checklist
- Updated Policy Response Tables 1 through 4

Sequim Valley Airport – Zone 3



**Clallam County Comprehensive Plan Update
Draft Amendments to the Clallam County Zoning Code, Title 33, CCC**

The following excerpts from the Clallam County Zoning Code relate directly or indirectly to the definitions and locations for distribution for the placement of emergency housing, emergency shelters, transitional housing and similar facilities in accordance with RCW 36.70A.070(2), and/or further the implementation of requirements under RCW 36.70A.681. The proposed changes shown herein are required to be adopted concurrently with the County's Comprehensive Plan Periodic Update.

Definitions, Section 33.03.010, CCC.

(36) "Emergency housing" means indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless and is intended to address basic health, food, clothing, and personal hygiene needs of individuals or families.

(37) "Emergency shelter" means a facility that provides a temporary shelter for individuals or families who are currently homeless. Emergency shelter facilities may include day and warming centers that do not provide overnight accommodations.

(48) "Household" means a housekeeping unit consisting of:

(a) an individual;

(b) two or more related persons;

(c) a group of two or more disabled residents protected under the Federal Fair Housing Amendment Act of 1988;

(d) adult family homes as defined under Washington State law;

(e) a group living arrangement where six or fewer residents receive support services such as counseling, foster care or medical supervision at the dwelling unit by resident or nonresident staff; or

(f) two or more residents not related by blood or marriage who live together in a dwelling unit, or in conjunction with any of the above individuals or groups.

(g) For purposes of this section, minors living with parent, legal custodian (including a foster parent), or legal guardian shall not be counted as part of the maximum number of residents.

(h) Any limitation on the number of residents resulting from this definition shall not be applied in a manner inconsistent with the Fair Housing Amendment Act of 1988, 42 U.S.C. 360, et seq., the Washington law Against Discrimination, Chapter 49.60 RCW, and/or the Washington Housing Policy Act, RCW 46.63.220.

(77) “Organic materials management facility” means a location and related improvements where organic waste, such as food scraps, yard trimmings or other organic materials that do not contain pesticides, pests, or other forms of chemical or biological contamination, is processed into new products like compost or energy, through composting, anaerobic digestion, vermiculture, black soldier fly, or similar technologies.

(84) “Permanent supportive housing” means subsidized, leased housing with no limit on length of stay that prioritizes people who need comprehensive support services to retain tenancy. It utilizes admissions practices designed to use lower barriers to entry than typical for other subsidized or unsubsidized rental housing, especially related to rental history, criminal history, and personal behaviors. Permanent supportive housing is paired with on-site or off-site voluntary services designed to support a person living with a complex and disabling behavioral health or physical health condition who was experiencing homelessness or was at imminent risk of homelessness prior to moving into housing to retain their housing and be a successful tenant in a housing arrangement, improve the resident’s health status, and connect the resident of the housing with community-based health care, treatment, or employment services.

(1040) “Single-family dwelling” means a dwelling unit detached from any other dwelling unit ~~and intended for occupation by one family~~ and including accessory improvements and uses. This definition includes manufactured homes such as mobile homes, modular homes and other homes manufactured in components or as one complete dwelling unit.

(114) “Transitional housing” means a project that provides housing and supportive services to homeless persons or families for up to two years and that has as its purpose facilitating the movement of homeless persons and families into independent living.

(114) “Vacation rental” means a legally constructed dwelling intended for occupancy of the entire dwelling (not rental of individual rooms) by any person/group other than the primary owner for periods of 30 days or less and is an allowed use in all zoning districts that allow single-family ~~residences~~dwellings. Uninhabitable structures like garages, barns, or sheds shall not be used as vacation rentals. “Vacation rental” does not include a bed and breakfast permitted and operated in accordance with this code.

Scope of Land Use Zones and Boundary Definitions, Ch 33.05, CCC,

Comprehensive Plan Designation	Regional Plan	Zoning Designation	CCC Section
<u>Various</u>	<u>Sequim/Dungeness</u> <u>Port Angeles</u>	Airport Overlay District	<u>33.07.060</u>
Urban Residential	<u>Sequim/Dungeness</u> <u>Straits</u>	Urban Residential High (URH)	<u>33.13.010</u>

Urban Residential	<u>Sequim/Dungeness Western</u>	Urban Residential Low (URL)	33.13.020
Urban Low Density	<u>Port Angeles, Western</u>	Urban Moderate Density (LD)	33.13.040
Open Space Overlay	<u>Port Angeles</u>	Urban Very Low Density/Urban Low Density (VLD/LD)	33.13.050
Urban Moderate Density	<u>Port Angeles, Straits</u>	Urban Moderate Density (MD)	33.13.060
<u>Open Space Overlay</u>	<u>Port Angeles</u>	Open Space Overlay/Open Space Corridor (OS)	33.13.070

Urban Zones, Ch 33.13, CCC,

33.13.030 Urban Very Low Density (VLD).

(9) Open Space Overlay: When Urban Very Low Density zoning districts contain contiguous critical areas they are identified by an Open Space Overlay (OS) designation ~~which identifies them as an area from which development rights may be transferred.~~

33.13.050 Urban Very Low Density/Urban Low Density (VLD/LD).

~~(7) Transfer of Development Rights:~~

~~(a) Development rights may be transferred from any urban property located within an Urban Very Low Density/Open Space Overlay zone or any rural property located within an Open Space Overlay Corridor. Development rights may be utilized to increase densities in the VLD/LD zoning district utilizing the transfer of development rights process of Chapter 33.26 CCC.~~

~~(b) The base density of the VLD/LD zoning district shall not be increased above nine (9) dwelling units per acre.~~

33.13.070 Open Space Overlay/Open Space Corridors (OS).

The purpose of the Urban Very Low Density/Open Space Overlay Zoning District and the Open Space Overlay Corridor is to ~~identify areas which have development rights which may be transferred in order to~~ further protect the critical areas or habitats identified by these overlay designations. Land uses, densities, lot sizes and setbacks are those allowed in the underlying zoning district. ~~A development right in an Urban Very Low Density/Open Space Overlay Zoning District or an Open Space Overlay Corridor is established by the density of development allowed in the underlying zoning district. For example, every five acres of land in a Rural Low (R5) Zoning District within an Open~~

~~Space Overlay Corridor has one development right. These development rights may be transferred as specified in Chapter 33.26 CCC.~~

Commercial Zones, Ch 33.15, CCC,

33.15.035 Diamond Point Airport (DPA).

(1) *Allowed Land Uses.* The following land uses should be allowed outright in the Rural Limited Commercial zoning district:

- Family daycare provider

33.15.060 Rural Limited Commercial (RLC).

(1) *Allowed Land Uses.* The following land uses should be allowed outright in the Rural Limited Commercial zoning district:

- Family daycare provider
- Home enterprise

33.15.067 Tourist Rural (TR).

(1) *Allowed Land Uses.* The following land uses should be allowed outright in the Rural Limited Commercial zoning district:

- Family daycare provider

33.15.070 Urban Neighborhood Commercial (UNC).

(1) *Allowed Land Uses.* The following land uses should be allowed outright in the Urban Neighborhood Commercial zoning district:

- Emergency housing
- Emergency shelter
- Family daycare propvider
- Permanent supportive housing
- Transitional housing

33.15.080 Urban Regional Commercial (URC).

(1) *Allowed land uses.* The following land uses should be allowed outright in the Urban Regional Commercial zoning district:

- Emergency housing
- Emergency shelter
- Family daycare provider

33.15.090 Urban Center (UC).

(1) *Allowed land uses.* The following land uses should be allowed outright in the Urban Center zoning district:

- Emergency housing
- Emergency shelter
- Permanent supportive housing
- Transitional housing

33.17.010 Industrial (M).

(1) *Allowed land uses.* The following land uses should be allowed outright in the Industrial zoning district:

- Organic materials management facility

33.17.020 Light Industrial (LI).

(1) *Allowed land uses.* The following land uses should be allowed outright in the Industrial zoning district:

- Organic materials management facility

Carlsborg Urban Growth Area, Ch 33.20, CCC,

Table 33.20.040(A).

Zoning District Use	CR-1	CR-2	CR-3	CN	CC	CGC	CI
<u>Emergency housing</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>A</u>	<u>A</u>	<u>A</u>	<u>X</u>
<u>Emergency shelter</u>	<u>X</u>	<u>X</u>	<u>X</u>	<u>A</u>	<u>A</u>	<u>A</u>	<u>X</u>
Group homes (16 or fewer persons)	€	€	€	A	A	X	X
Group homes (17 or more persons)	€	€	€	A	A	X	X
<u>Permanent supportive housing</u>	<u>X</u>	<u>X</u>	<u>C</u>	<u>A</u>	<u>A</u>	<u>A</u>	<u>X</u>
<u>Transitional housing</u>	<u>X</u>	<u>X</u>	<u>A</u>	<u>A</u>	<u>A</u>	<u>A</u>	<u>X</u>

A-Allowed Land Use, C – Conditional land use, X – Prohibited Land Use

Sequim Urban Growth Area, Ch 33.19, CCC,

33.19.030 Purpose of Districts.

(1) Sequim Urban Residential – II [S(R-II)]. The S(R-II) zone establishes areas of low density, urban residential development consisting primarily of single-family detached residences up to one dwelling unit to one acre without required urban level facilities and services and up to five dwelling units per acre with ~~transfer of development rights and~~ the provision of urban level facilities and services. The S(R-II) zone provides for consistency and predictability in established single-family neighborhoods.

(2) Sequim Urban Residential – III [S(R-III)]. The S(R-III) zone establishes areas of medium density, urban residential development consisting of single-family, duplex, or multifamily residences up to 10 dwelling units per acre with ~~transfer of development rights and~~ provision of urban level facilities and services. The S(R-III) zone is located in areas where urban services are or will be provided concurrent with development, and is typically found in close proximity to transit, with easy access to neighborhood parks, schools and shopping.

(3) Sequim Urban Residential – IV [S(R-IV)]. The S(R-IV) zone establishes areas of medium to high density, urban residential development consisting of single-family attached and detached; single-family small lot; multifamily duplexes, triplexes, and apartment development allowed at a density of up to 16 dwelling units per acre with ~~transfer of development rights and~~ the provision of urban level facilities and services. The S(R-IV) zone is located in areas where urban services are currently available or will be provided concurrent with development, and is typically found in close proximity to transit, with easy access to neighborhood parks, schools and shopping.

33.19.040 Use Tables.

Table 33.19.040(A).

Zoning District Use	S(R-II)	S(R-III)	S(R-IV)	S(RDP)
Group homes (16 or fewer persons)	€	€	€	X
Group homes (17 or more persons)	€	€	€	X

A-Allowed Land Use, C – Conditional land use, X – Prohibited Land Use

33.19.050 Bulk and Dimensional Standards.

(2) *Bulk, Dimensional and General Requirements.* Bulk, dimensional, and general requirements are herewith established and shall be provided in accordance with the minimum standards hereinafter set forth in Table (A) of this subsection. Bulk and dimensional standards measure the spatial, four-dimensional limitations of the site, including height, width, depth, and coverage. Lot size and residential density are also subject to ~~subsection (3) of this section and~~ CCC [33.19.060\(1\)](#).

Table 33.19.050(2)(A). Bulk, Dimensional and General Requirements.

Zone	Minimum (feet)		Maximum		
	Lot Size	Required Setbacks ¹			

		Lot Width	Front			Side (each)	Rear	Lot Coverage	Building Height (feet)	Residential Density
			Access Road	Collector Road	Arterial Road					
S(R-II)	9,000 square feet	50'	20'	25'	35'	10'	15'	50%	35'	4 du/acre without TDR ² OR up to 5 du/acre with TDR
S(R-III)	9,000 square feet for single-family 9,000 square feet plus 2,000 square feet per additional unit for duplex and multifamily residences regardless of the number of buildings	50'	20'	25'	35'	10'	15'	50%	35'	4 du/acre without TDR ² OR up to 10 du/acre with TDR
S(R-IV)	6,000 square feet for single-family 6,000 square feet plus 2,000 square feet per additional unit for duplex and	50'	20'	25'	35'	10'	15'	50%	50'	4 du/acre without TDR² OR up to with TDR 16 du/acre

multifamily residences regardless of the number of buildings										
--	--	--	--	--	--	--	--	--	--	--

~~2 Clallam County will allow for a maximum residential density of four dwelling units per acre without the transfer of development rights from lands zoned Agricultural Retention. Residential density greater than four dwelling units per acre up to the maximum allowed residential density of the zone (see above) shall require transfer of development rights from an Agricultural Retention zoned lot(s) pursuant to subsection (3) of this section. The requirement for the purchase or transfer of development rights shall not apply to the construction of up to two dwelling units on a legal lot of record created prior to July 28, 1998.~~

~~(3) Transfer of Development Rights. This chapter designates the S(R-II), S(R-III), and S(R-IV) residential zones as receiving areas of transferable development rights from lands designated Agricultural on the Official Sequim-Dungeness Regional Comprehensive Plan Map, as amended, consistent with CCC 31.03.230(6)(a), Comprehensive Plan Policy 10. Table 33.19.050(2)(A) establishes the residential density for which transfer and/or purchase of transferable development rights shall be required within the S(R-II), S(R-III), and S(R-IV) zones. The actual transfer and/or purchase of transferable development rights shall follow the requirements as set forth under Chapter 33.26 CCC.~~

General Requirements, Ch. 33.40, CCC,

33.40.110 Notice of Proximity to Resource Zone.

All building permits or other development permits issued by the Department of Community Development for activities occurring within 500 feet of lands designated as Agricultural Retention (AR), Commercial Forest (CF), Commercial Forest/Mixed Use 20 (CFM20), Commercial Forest/Mixed Use 5 (CFM5), or Mineral Resource Land Overlay, shall be provided a written notice on or accompanying the final permit that contains the following language:

This development activity is within five hundred (500) feet of property zoned for forestry, agricultural purposes or as a designated mining site. You may be subject to inconveniences or discomforts arising from such operations, INCLUDING BUT NOT LIMITED TO NOISE, TREE REMOVAL, ODORS, INSECTS, FUMES, DUST, SMOKE, THE OPERATION OF MACHINERY OF ANY KIND DURING ANY 24 HOUR PERIOD (INCLUDING AIRCRAFT), THE STORAGE AND DISPOSAL OF MANURE, AND THE APPLICATION BY SPRAYING OR OTHERWISE OF CHEMICAL FERTILIZERS, SOIL AMENDMENTS, HERBICIDES AND PESTICIDES. Clallam County has determined that the use of real property for forestry, mining or agricultural operations is a high priority and favored use to the County and those inconveniences or discomforts arising from

these operations, if such operations are consistent with commonly accepted best management practices and comply with local, State and Federal laws. However, those activities which are not related to normal forestry, mining, or agricultural operations, or which do not follow accepted best management practices, are not protected under these provisions and will be considered a nuisance.”

Accessory Housing, Ch 33.50, CCC,

33.50.010 Purpose and intent.

(1) Ensure that accessory housing remains clearly an incidental and subordinate use to the principal dwelling unit~~existing single-family dwelling~~ or business.

(9) Provide a legal avenue for the sale or other conveyance of an accessory dwelling unit within a designated urban growth area as a condominium in order to promote affordable for-sale housing.

33.50.030 General requirements.

(5) *Sale or Transfer of Accessory Housing Units.* Accessory housing units shall not be sold as separate dwelling lots from the subject property, unless the portion of the subject property containing the accessory housing unit is legally subdivided from the remainder of the property pursuant to CCC Title 29 or the accessory housing unit, if located within a designated urban growth area, is sold or conveyed as a condominium in accordance with Chapter 64.34 RCW.



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Memorandum

Date: December 2, 2025
To: Clallam County Planning Commission
From: Bruce Emery, Director of Community Development
Re: Supplemental Analysis for Zoning Change, Sequim UGA

Hello Planning Commissioners,

The 2025 Land Capacity Analysis (LCA) identified a deficit of 147 high-density residential units within the development potential under existing zoning within the unincorporated Sequim UGA. This deficit was determined based on the requirements of RCW 36.70A.070(2)(c), which mandates that the County accommodate the projected housing needs for all income segments, including moderate (80-120% AMI) low (50-80% AMI), very low (30-50% AMI) and extremely low (0 to 30% AMI) income earners (AMI: Area Median Income). According to the LCA, housing for very low and extremely low-income segments can only be achieved under high-density zoning (10 DUs/acre or greater). At five homes per acre, the S(R-II) zone does not produce housing within the high-density target. To achieve this, an expansion of the S(R-III) Zone (or greater) is needed.

Staff considered several locations for contemplating an increase from the S(R-II) to the S(R-III) Zone. Two locations, one at the intersection of N. Sequim Ave and Hendrickson Road, and another along the north side of E. Silberhorn Road near 7th Ave, were selected. However, several Planning Commission members expressed concerns regarding the selection, and were interested in knowing what other alternatives exist with respect to areas that can be appropriately upzoned.

Attached is a table showing data for each of the 18 local polygon or neighborhood areas with a current zoning designation of S(R-II). A reference map is also provided to detail the location of each neighborhood area. Each neighborhood was analyzed by selecting all vacant lots and lots with additional development potential (developed lots of 2+ acres with additional room). The existing development character and presence of water and sewer were also considered. Consistent with the methods used in the LCA, a market factor of 15% for vacant lots and 25% for built lots with additional development potential, was subtracted from the calculated development potential to account for preferences of individual land owners who simply do not wish to development (These numbers may actually be higher, but we chose to follow the Department of Commerce's recommendations regarding this methodology). Wetlands and geologically hazardous areas were also subtracted.

The first column identifies the *Neighborhood Reference Number* and assigned name. The second and third columns show the gross acreage for the neighborhood and the potential

acreage available for development. The fourth column includes the *Net Lots*, or net lot potential (increase in potential) should the area be changed from S(R-II) to S(R-III). The fifth column includes the percentage (%) of development capacity remaining in the neighborhood. This represents the overall area available for development or redevelopment. Omitted are areas that are already developed or precluded areas, such as wetlands. The higher the percentage of capacity, the more room there is within the neighborhood to accommodate future growth, including the high-density target.

The sixth column includes the *Capacity per Gross Acre*, which represents the overall effectiveness of the zoning change based on the development potential. The higher the number, the more units on a per-acre basis could result. This helps to indicate those areas where a change in zoning may produce measurable differences in the future as opposed to neighborhoods that are already nearly at full development. The seventh and eighth columns indicate the presence of sewer and water, with the last column including staff's qualitative comments.

As discussed earlier, we are hoping to target areas with good development potential to be able to demonstrate and achieve the required housing target. Generally, if we focused on neighborhoods that demonstrate a *Development Capacity* of 40% or greater, and a *Capacity per Gross Acre* of 4/acre or more, we would be maximizing the effect of the zoning change without having to extend it over a broader area. Neighborhoods 1 & 2 (staff proposal) meet these criteria. Also, Neighborhoods 5, 16, 17 and 18 meet them as well. Neighborhood 16 does not have water service and is a landowner with a history of expressing no desire to be located within City limits. Neighborhoods 17 and 18 also lack water service. At their elevation, water system expansion is not likely in the near future and will require substantial system upgrades including sourcing, pump stations, or possibly both. For these reasons, Neighborhoods 16 through 18 are not good candidates.

Neighborhood 5 does have services available and does indicate a good development potential. However, it is located between a high-activity commercial area (Wal-Mart, etc.) and a neighborhood that has requested to remain outside of the Urban Growth Area (Palo Verde Loop). The potential for conflict between these opposites make Neighborhood 5 less than ideal for any subsequent changes.

We would like to go through this information in more detail during Wednesday night's meeting, which may include reviewing aerial photos and answering any questions you may have. If you have any questions regarding this information, please contact me at 360-417-2323 or at bruce.emery@clallamcountywa.gov.

Sincerely,



Bruce Emery, Director
Clallam County DCD

Unincorporated Sequim Urban Growth Area

Summary of Development Potential should S(R-II) be changed to S(R-III) Zoning

Neighborhood Reference Number	Neighborhood size (acres)	Available Acreage	Net Lots (capacity)	% Dev. Capacity	Capacity per Gross Acre *	Water Service	Sewer Service	Notes
1: Sequim Ave & Hendrickson	17.2	7.3	73	42%	4.2	Yes	E. side	Good potential, proximity to S(R-III) & R4-8 Zones.
2: Silberhorn near 7th	14.1	10.2	102	72%	7.2	Yes	S. side	Good potential, proximity to S(R-IV) & R4-8 Zones.
3: Falcon to Viking Way	192.4	20.8	208	11%	1.1	N 1/3rd	NE Corn.	Poor potential, peripheral to urban core.
4: Narrow Way to Turnstone	7.2	0.8	8	11%	1.1	No	No	No utilities, poor potential.
5: Priest & W. Bracket	16.6	6.7	67	40%	4	Yes	S. side	Good potential, difficult location.
6: N. Kendall to Marriott	52.7	5.4	54	10%	1	Yes	NE corn.	Poor potential, peripheral to urban core.
7: Duke to Choice Loop	60.7	0.6	6	1%	0.1	Yes	S. side	Very poor potential, mostly developed.
8: Daytona & Beverage	55.8	6.8	68	12%	1.2	Yes	S. side	Poor potential, mostly developed.
9: Gierin & Stone Farms	31.6	8.3	83	26%	2.6	Yes	Middle	Some potential, peripheral to urban core
10: N. Brown to Dunlap Ave.	20.6	4.0	40	19%	1.8	Yes	E. side	Poor potential, mostly developed.
11: N. Rhoderfer	40.5	3.5	35	9%	0.9	Yes	E. & Mid.	Poor potential, mostly wetland.
12: Washington Harbor	143.9	13.4	134	9%	0.9	Yes	N. & W.	Poor potential, dedicated OS land.
13: Keeler & W. Sequim Bay	51.9	8.7	87	17%	1.7	No	No	Poor potential, no utilities.
14: Forest & W. Sequim Bay	25.6	4.2	42	16%	1.6	No	No	Poor potential, no utilities.
15: Flaura's Acres	25.1	2.5	25	10%	1	Yes	E. & N.	Poor potential, mostly developed.
16: Miller North	30.1	15.3	153	51%	5.1	No	S. side	No water, landowner unwilling.
17: Happy Valley & 3rd East	115.7	54.0	540	47%	4.7	No	N. 1/3rd	High capacity, no water, peripheral to urban core.
18: Happy Valley & 3rd West	87.3	39.9	399	46%	4.6	No	N. 1/3rd	High capacity, no water, peripheral to urban core.
(* Units potential per acre)								
Growth target per LCA is 147 high-density residential units.								

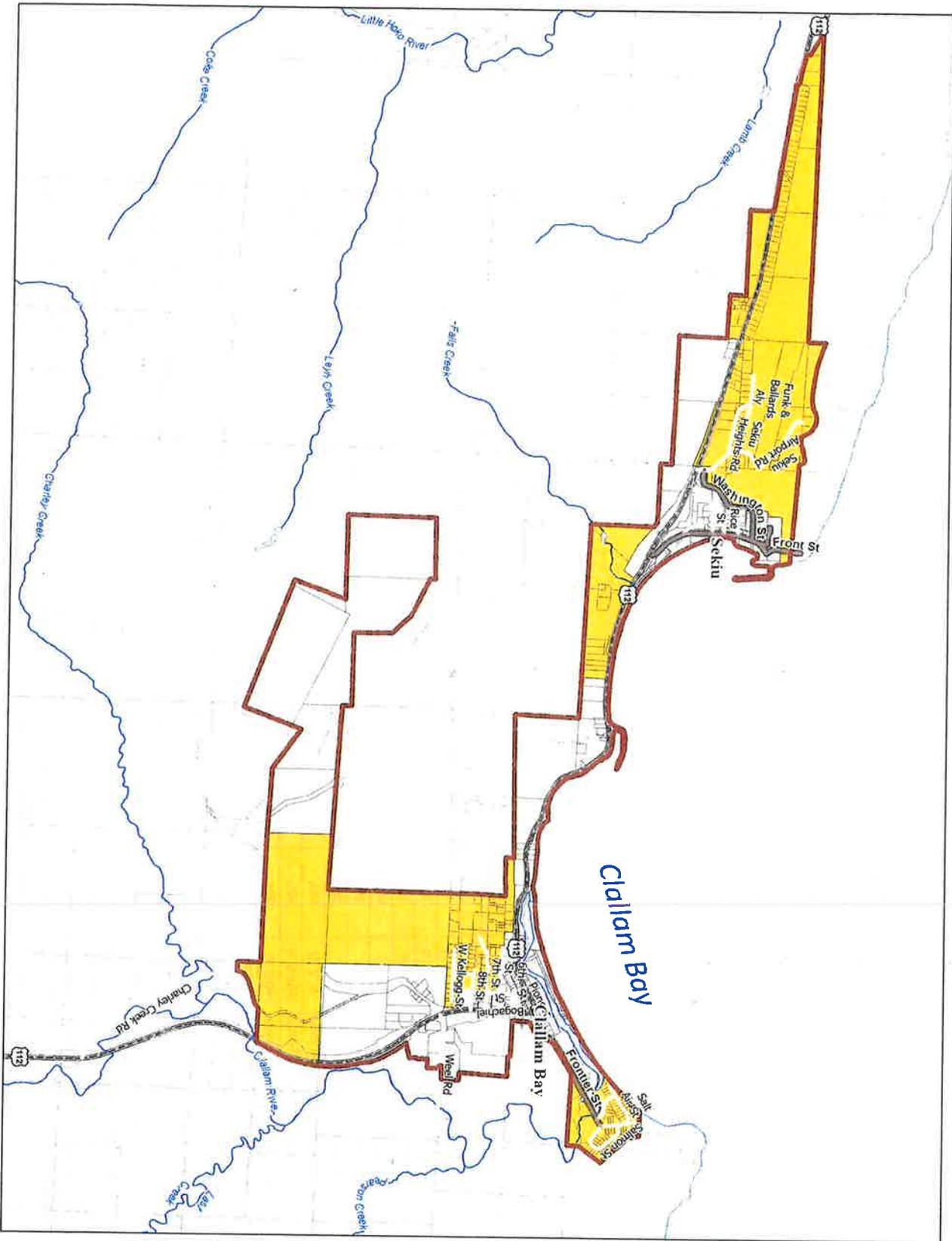
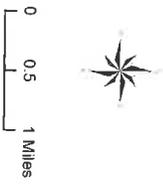
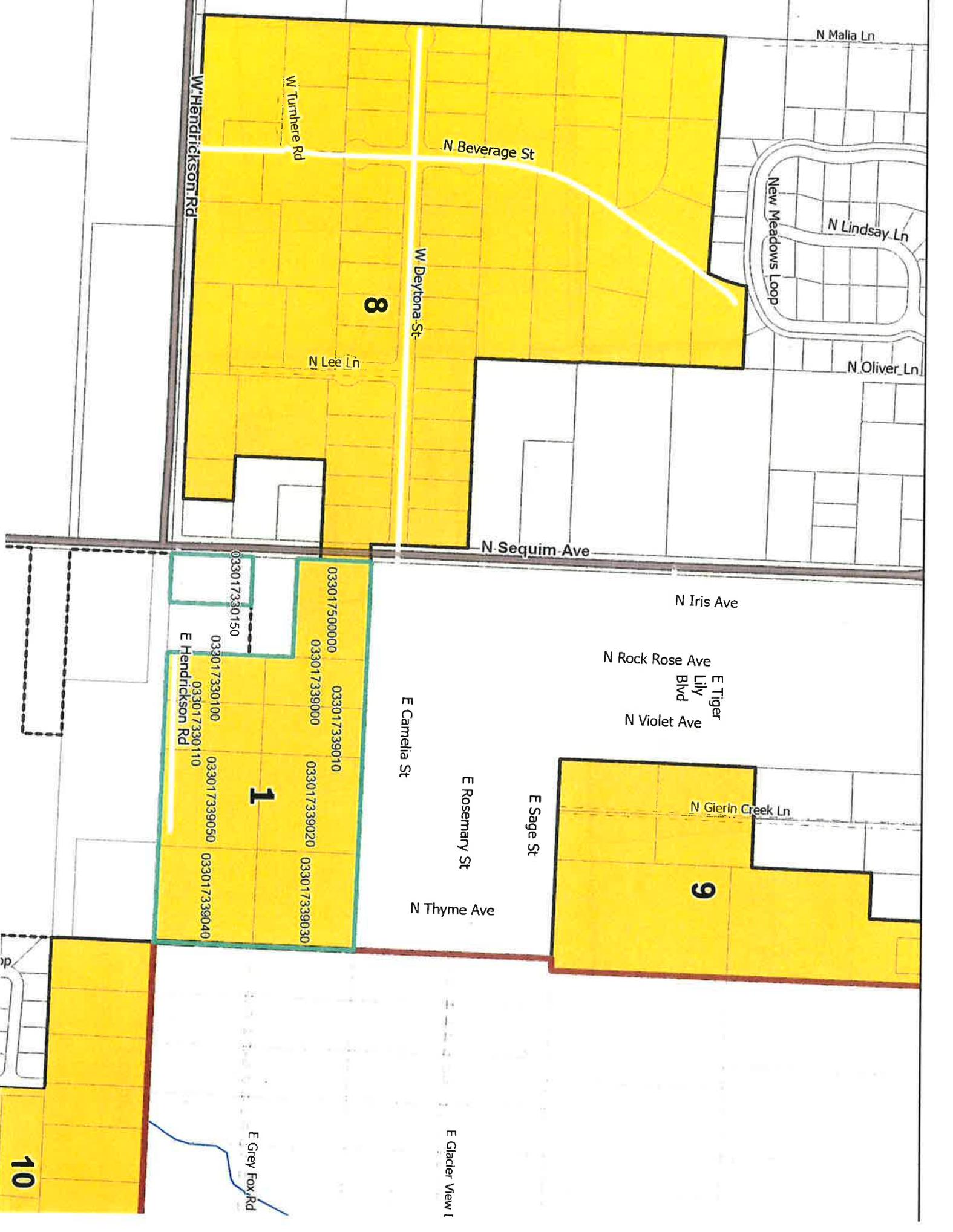


Exhibit A Reference Map

Amending Title 31, Generalized Zoning and Future Land Use Map - Clallam Bay/Seku Urban Growth Area - Urban Residential High (URH) to Urban Moderate Density (MD)

- Redesignate URH to MD
- Parcels
- Urban Growth Area
- Incorporated City of Sequim
- City Limits
- Main roads
- Other roads
- Streams





N Malia Ln

W/Hendrickson Rd

W Turnhere Rd

N Beverage St

New Meadows Loop

N Lindsay Ln

8

W Deytona St

N Lee Ln

N Oliver Ln

N Sequim Ave

N Iris Ave

N Rock Rose Ave

E Tiger Lily Blvd

N Violet Ave

E Camelina St

E Rosemary St

E Sage St

N Gierln Creek Ln

9

N Thyme Ave

033017500000 033017339010
 033017339000 033017339020
 033017330150 033017339050
 033017330100 033017339040
 033017330110 033017339030

1

E Hendrickson Rd

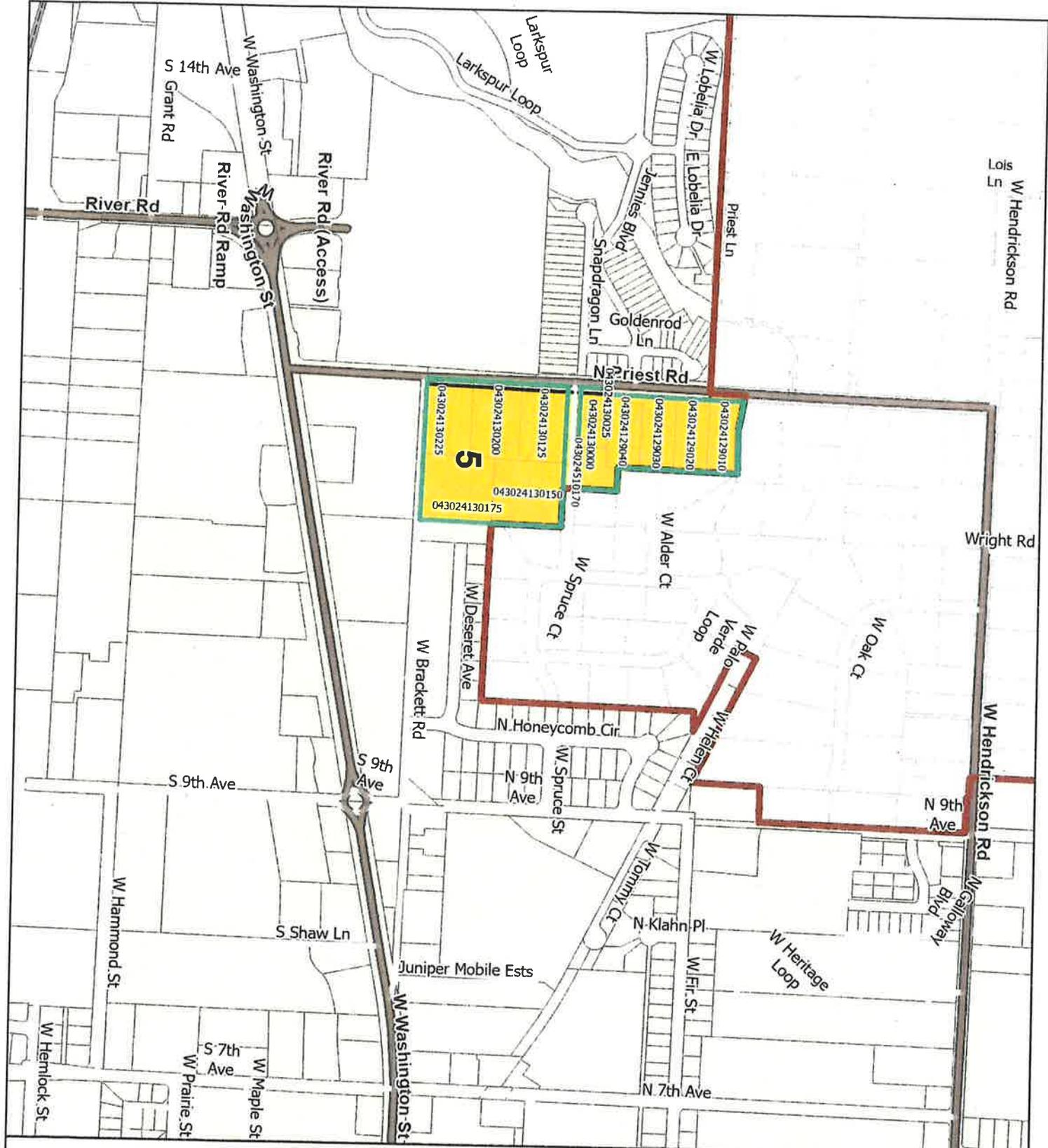
E Grey Fox Rd

E Glacier View I

10

Exhibit D Reference Map

Amending Title 31, Generalized Zoning and Future Land Use Map- Sequim Urban Growth Area- 16.6 acres Sequim Urban Residential II (SR-II) to Sequim Urban Growth Area Urban Residential III (SR-III)





CLALLAM COUNTY
Department of Community Development
County Courthouse
223 E. 4th St., Suite 5
Port Angeles, WA 98362-3015
Phone: (360) 417-2323
Fax: (360) 417-2443

bruce.emery@clallamcountywa.gov

December 4, 2025

PRESS RELEASE
For Immediate Release

Clallam County Planning Commission to Continue Public Hearings on Proposed Land Use Map Changes and Changes to Comprehensive Plan, December 17, 2025

The Clallam County Planning Commission will continue its public hearings at 6:00 PM on Wednesday, December 17, 2025, and again on Wednesday, January 7, 2026, in the Commissioners Meeting Room of the Clallam County Courthouse, to hear public testimony concerning proposed update/changes to Title 31, Clallam County Comprehensive Plan and Title 33, Clallam County Zoning Code. The proposed update/changes are in response to requirements of the State Growth Management Act (GMA, RCW 36.70A). Included are proposed changes to the Comprehensive Land Use Map and Zoning Map for approximately 31.3 acres within the unincorporated Sequim Urban Growth Area from Sequim Urban Residential II (SR-II) to Sequim Urban Residential III (SR-III). The change will result in an increase in potential residential density from five (5) residences per acre to ten (10) residences per acre. Also included is a proposed change for all the current Urban Residential High (URH) designation to the Urban Moderate Density (MD) designation within the Clallam Bay/Seki Urban Growth Area, which will increase residential density from one residence per 12,500 square feet, to 16 residences per acre. The proposed changes are being made in response to new housing requirements specified under RCW 36.70A.070(2).

The full text and maps of the proposed changes are available online at: <https://www.clallamcountywa.gov/1842/Comprehensive-Plan-Update>. Any interested person or party may submit written or oral comments on the proposal. Comments can be submitted at the public hearing or in advance of the public hearing at web_DCDPlan@ClallamCountyWa.Gov, or at the Department of Community Development, 223 E. 4th St., Suite 5, Port Angeles, WA 98362-3015. Upon completion of the public hearing process, the Planning Commission will forward its recommendations to the Board of Clallam County Commissioners for its consideration and further action.

Emery, Bruce

From: Emery, Bruce
Sent: Thursday, December 4, 2025 12:17 PM
To: Forks Forum-Herald; pfisher@radio-pacific.com; KONP News; KONP Radio; news@ksqmf.com; news@peninsuladailynews.com; Matthew.Nash@sequimgazette.com; Sequim Gazette
Cc: Havel, Tim; Clark, Donella
Subject: Press Release, Zoning Changes
Attachments: Press Release Zoning 120425.doc; Exhibit A.pdf; Exhibit B.pdf; Exhibit C.pdf

Good afternoon, Press Colleagues,

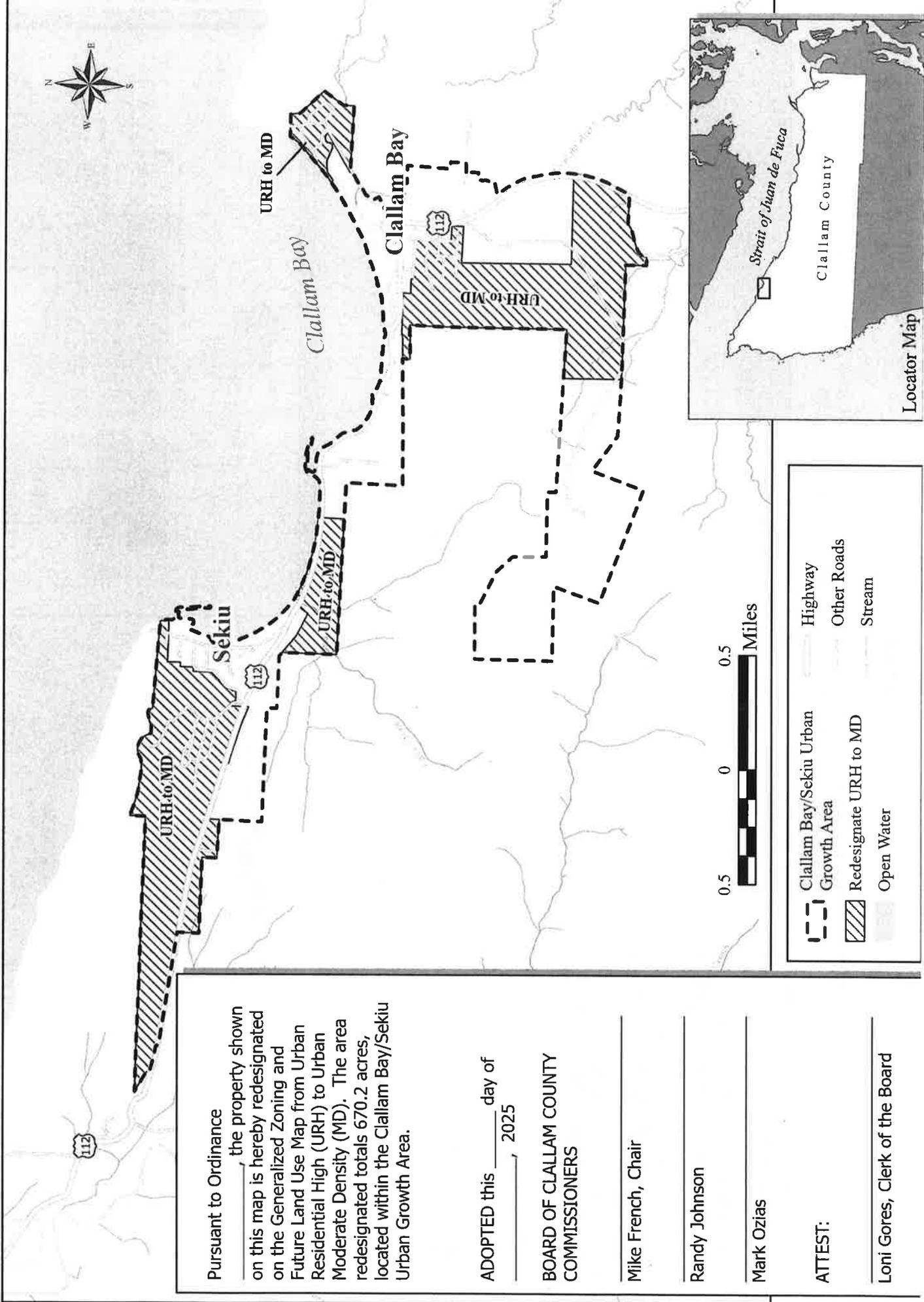
Attached is a second Press Release (first issued 10/23/25) concerning the Clallam County Comprehensive Plan Update (CPU). This second release includes more detailed information about proposed zoning changes as part of the CPU. If you have any questions regarding this information, please contact me at 360-417-2323 or at this email. Thank you for your attention to this matter.

Sincerely,

Bruce Emery, Director
Clallam County DCD

Exhibit A

Amending Title 31, Generalized Zoning and Future Land Use Map - Clallam Bay/Seki Urban Growth Area - Urban Residential High (URH) to Urban Moderate Density (MD)



Pursuant to Ordinance _____, the property shown on this map is hereby redesignated on the Generalized Zoning and Future Land Use Map from Urban Residential High (URH) to Urban Moderate Density (MD). The area redesignated totals 670.2 acres, located within the Clallam Bay/Seki Urban Growth Area.

ADOPTED this _____ day of _____, 2025

BOARD OF CLALLAM COUNTY COMMISSIONERS

Mike French, Chair _____

Randy Johnson _____

Mark Ozias _____

ATTEST:
Loni Gores, Clerk of the Board _____

Exhibit B

Amending Title 31, Generalized Zoning and Future Land Use Map- Sequim Urban Growth Area- 14.1 acres Sequim Urban Residential II (S(R-II)) to Sequim Urban Growth Area Urban Residential III (S(R-III))

Pursuant to Ordinance _____
 Parcel numbers 033030220100 and 043025110000 are hereby redesignated on the Generalized Zoning and Future Land Use Map from Sequim Urban Residential II (S(R-II)) to Sequim Urban Growth Area Urban Residential III (S(R-III)). The area redesignated totals 14.1 acres, located within the Sequim Urban Growth Area.

ADOPTED this _____ day of _____, 2025

BOARD OF CLALLAM COUNTY COMMISSIONERS

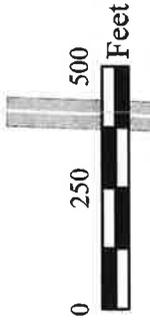
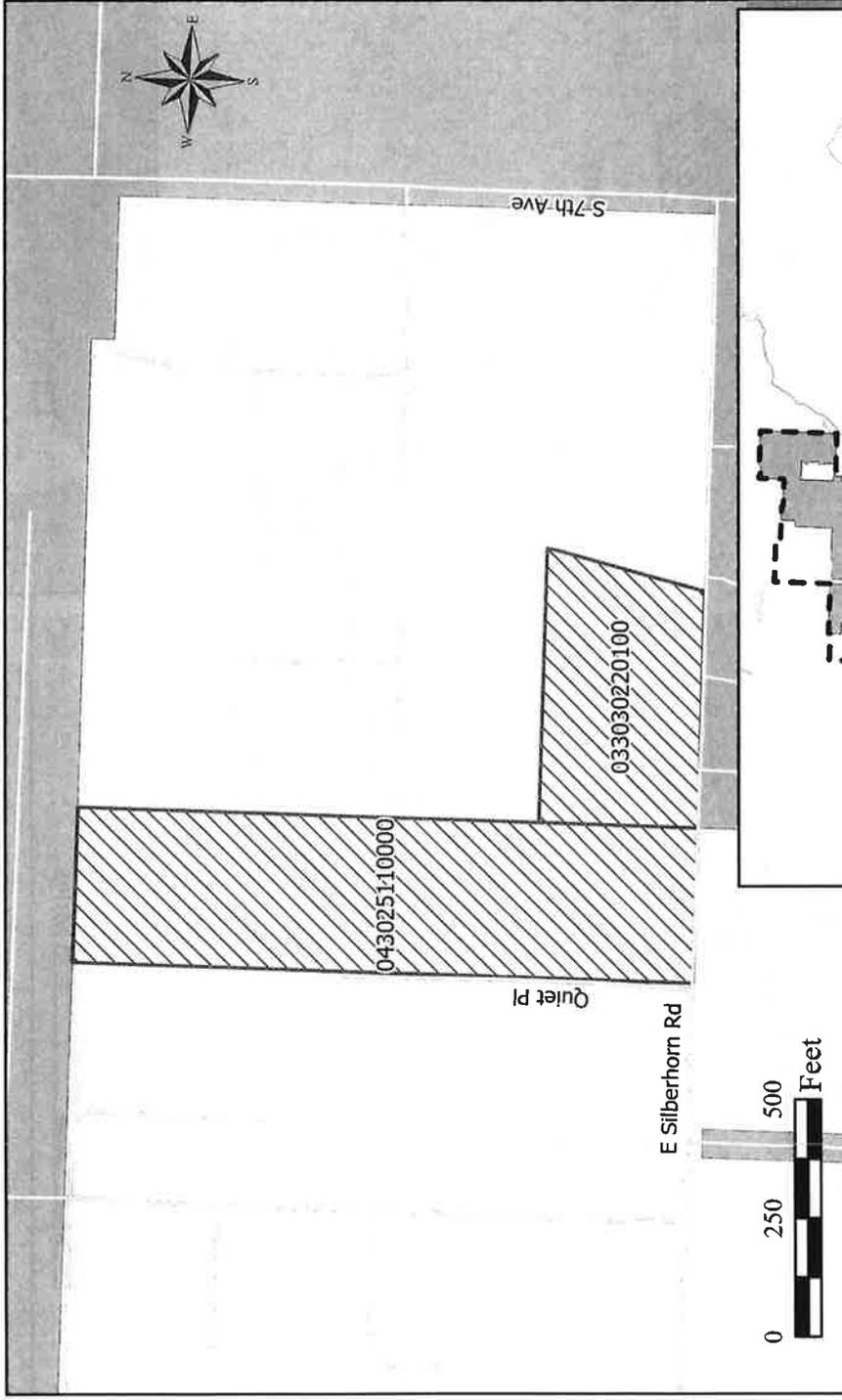
Mike French, Chair

Randy Johnson

Mark Ozias

ATTEST:

Loni Gores, Clerk of the Board



- Sequim Urban Growth Area
- Incorporated City of Sequim
- Redesignate S(R-II) to S(R-III)
- Open Water
- Highway
- Other Roads
- Stream

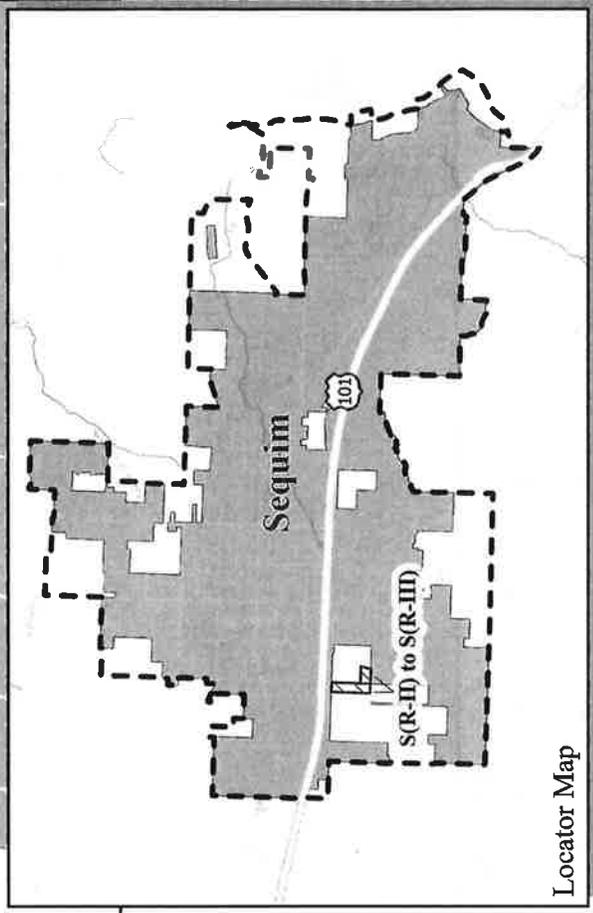


Exhibit C

Amending Title 31, Generalized Zoning and Future Land Use Map- Sequim Urban Growth Area- 17.2 acres Sequim Urban Residential II (S(R-II)) to Sequim Urban Growth Area Urban Residential III (S(R-III))

Pursuant to Ordinance _____
 17.2 acres east of North Sequim Avenue, north of East Hendrickson Road, and south of East Camelia Street and within the Sequim Urban Growth Area is hereby redesignated on the Generalized Zoning and Future Land Use Map from Sequim Urban Residential II (S(R-II)) to Sequim Urban Growth Area Urban Residential III (S(R-III)). The area redesignated totals 17.2 acres, located within the Sequim Urban Growth Area.

ADOPTED this _____ day of _____, 2025

BOARD OF CLALLAM COUNTY COMMISSIONERS

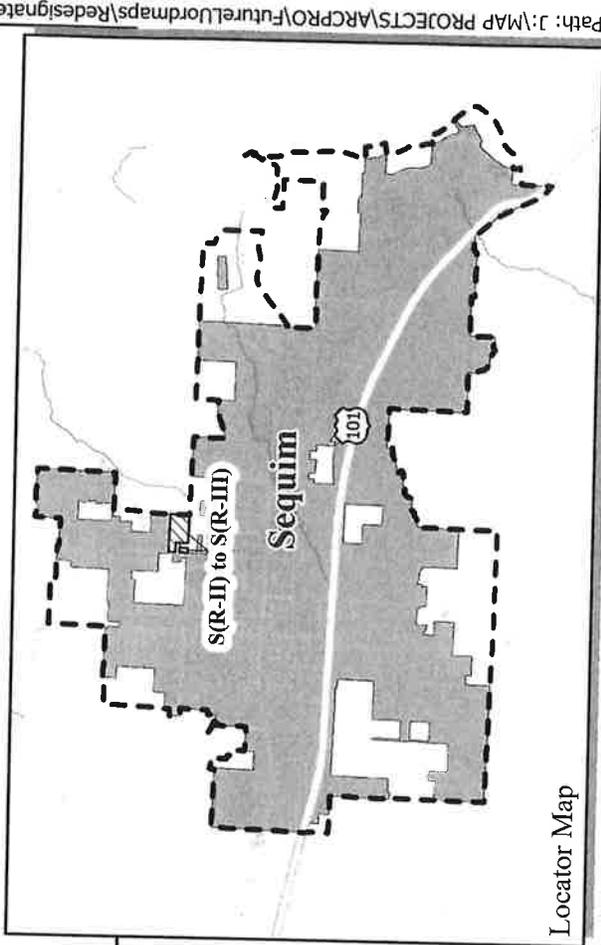
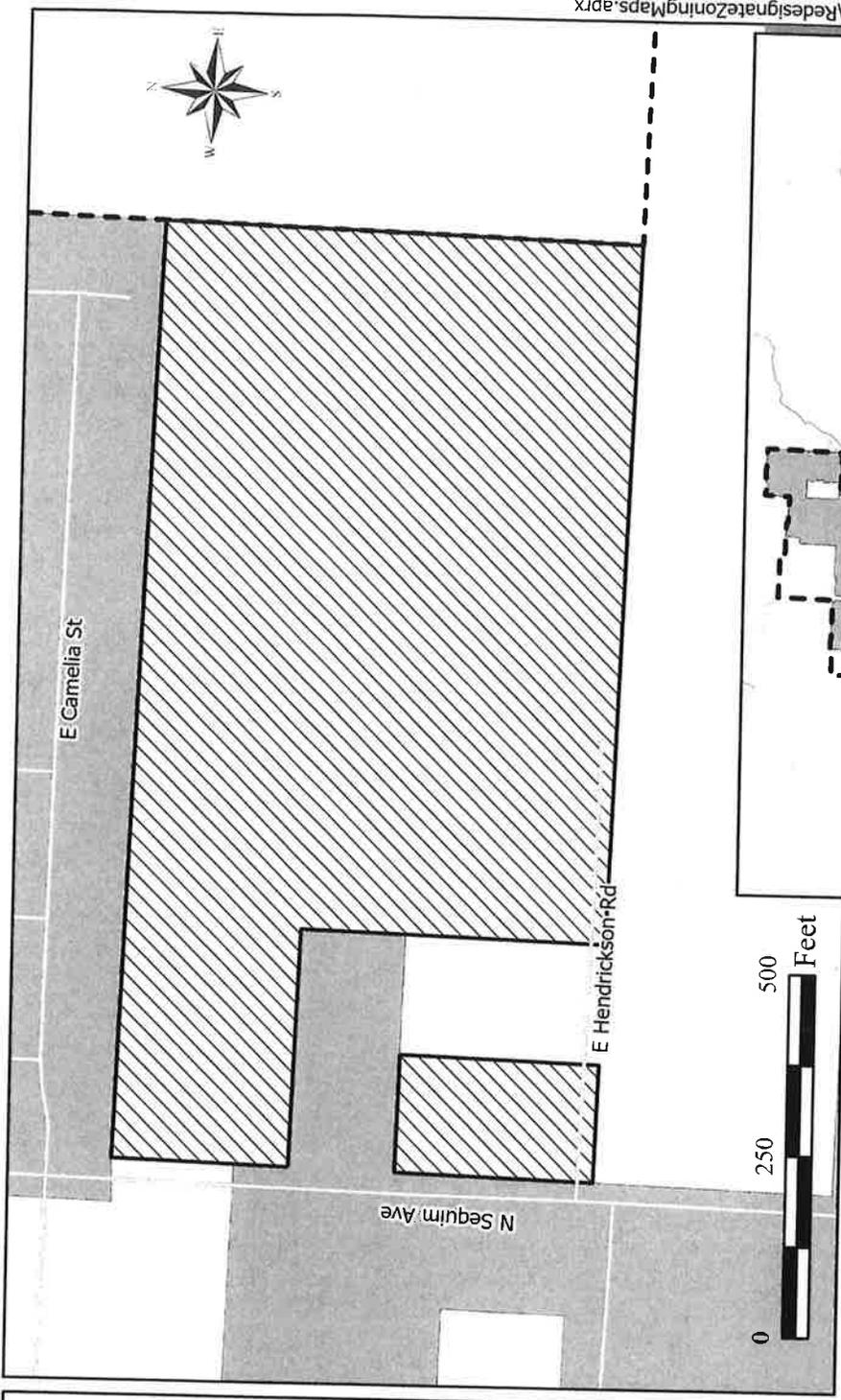
 Mike French, Chair

 Randy Johnson

 Mark Ozias

ATTEST:

 Loni Gores, Clerk of the Board





Scale: 1" = 600'

**WATER SYSTEM
MAP**

-  FIRE HYDRANT
-  WAT_VALVE
-  CLOSED VALVE

-  WATER LINE
-  SERVICE LINE
-  ABANDONED WATER LINE
-  PROPOSED WATER LINE

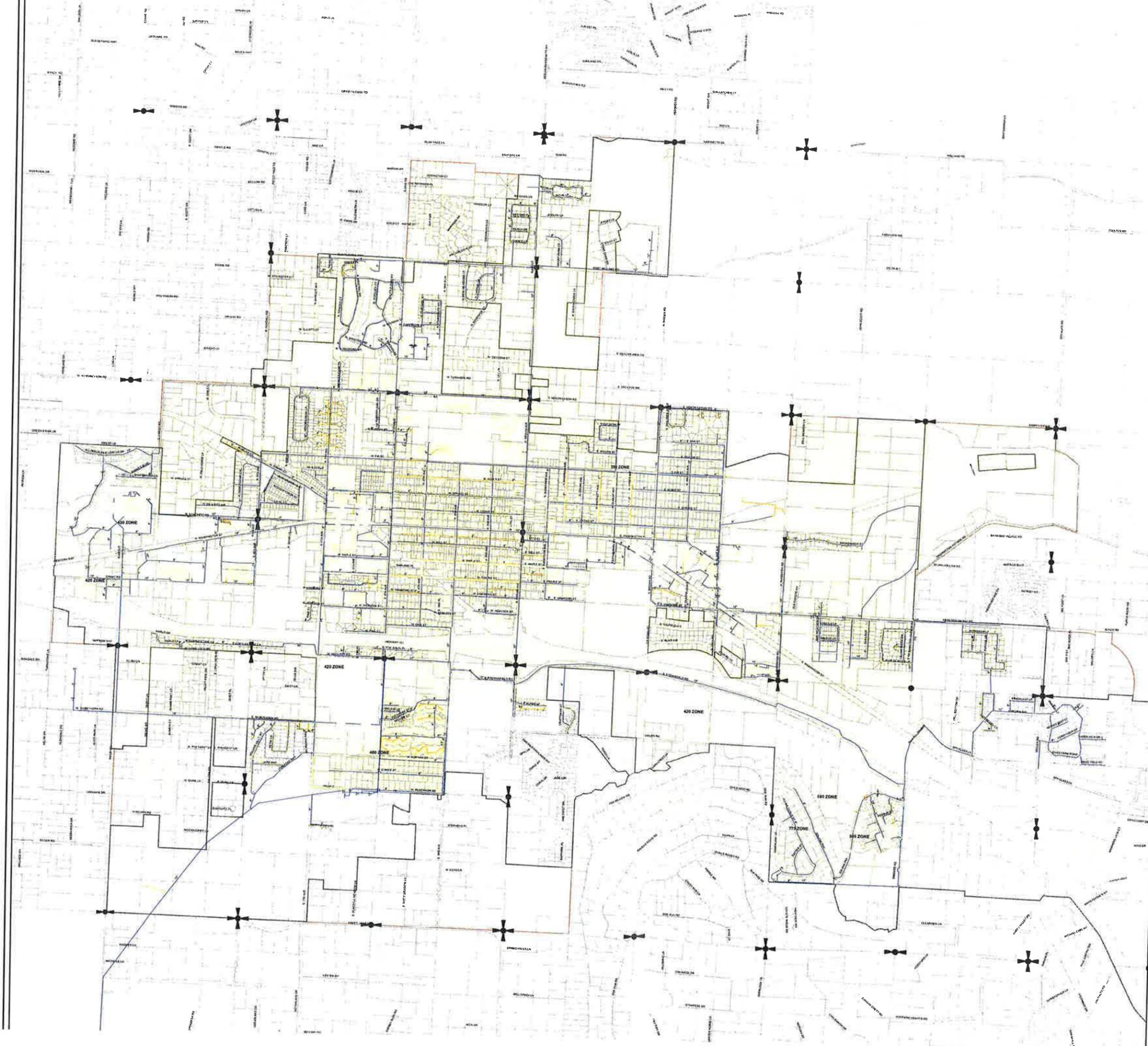
-  BUILDINGS
-  PARCELS
-  CITY LIMITS

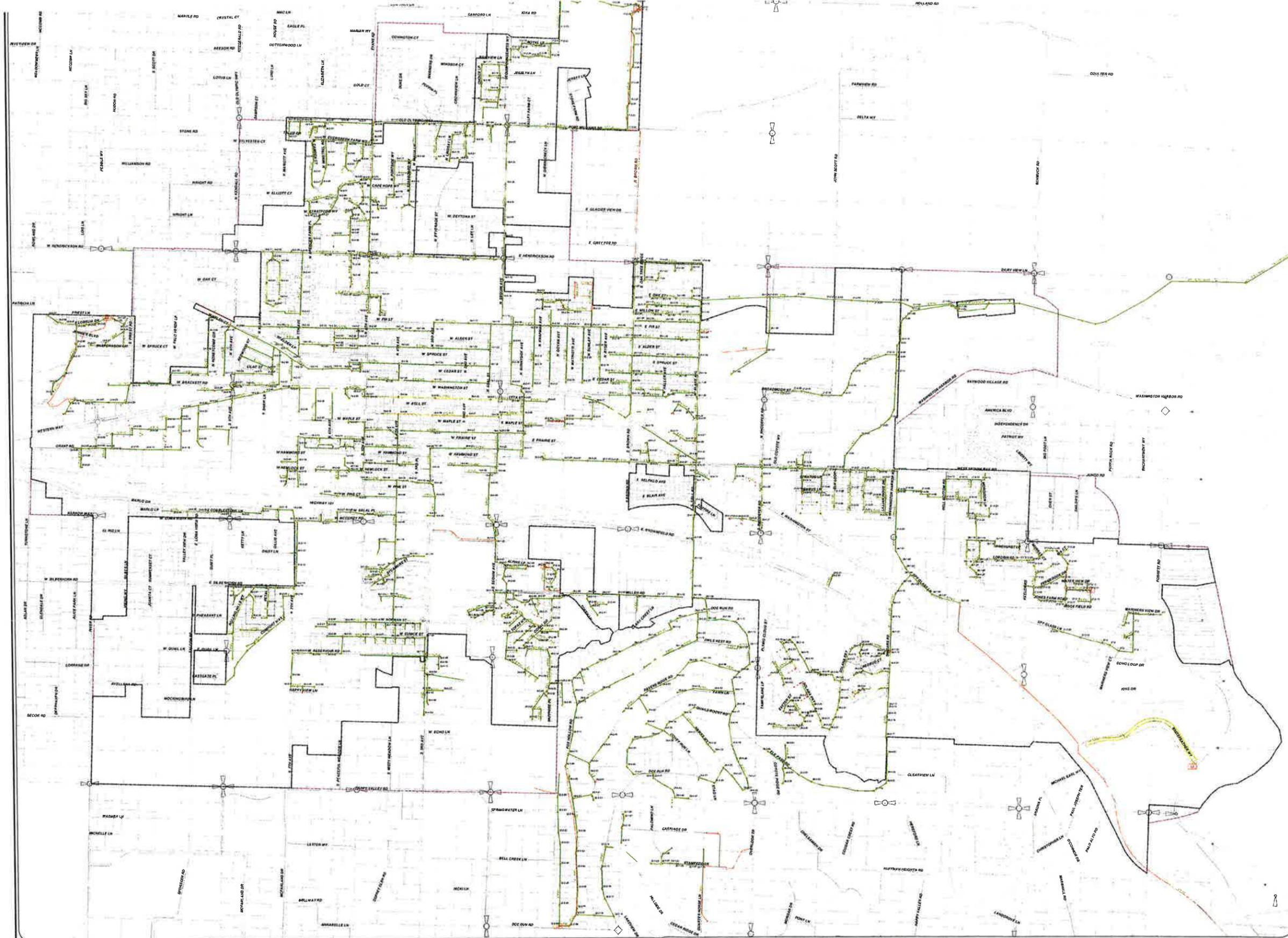
-  UGA
-  QUARTER SECT.

- PressureZone**
-  350 ZONE
 -  395 ZONE
 -  480 ZONE

LOCATION:	
DATE:	July 26, 2008
SCALE:	1" = 600'
PAGE:	1 OF 1

Full verification of the accuracy of any information contained in this map is the sole responsibility of the user. Parcel information was obtained from Clallam County. Parcel lines are based on available 2008 records and existing map records, not field. Full accuracy of parcel lines has been assumed to be true for planning only. The parcel mapping may contain inaccuracies and should not be relied upon for site-specific analysis, property acquisition, determination of right-of-way, property assessment, or land use. No representation of warranty regarding the production accuracy of any map herein is either expressed or implied by publication of this map. By creating this map, the user releases the City of Sequim from any and all claims, liability or actions of persons made based on information contained in this map.





- 500' CONTOUR
- CITY LIMITS
- UGA
- SECTION NUMBER
- SECTION CORNER

- SEWER**
- LIFT STATION
 - MAINTENANCE HOLE
 - CO
 - SEWER LINE
 - LINER (INSULFORM)
 - SERVICE LINE
 - PROPOSED SEWER LINE

This is a preliminary map and should not be used for construction purposes. It is intended for informational purposes only. The City of Sequim is not responsible for any errors or omissions on this map. The map is subject to change without notice. The City of Sequim reserves the right to modify or delete any information on this map at any time without notice.

1 inch = 600 feet

SEWER MAP

City of Sequim
 615 N 5th Avenue, Sequim, WA 98382
 Tel: (360) 683-4908 Fax: (360) 681-0552





Formerly DCG/Watershed

TECHNICAL MEMORANDUM

Date:	December 5, 2025
To:	Bruce Emery, Director, Clallam County Department of Community Development; Tim Havel, Deputy Director, Clallam County Department of Community Development
Cc:	Dan Nickel, Director, Long Range Planning (Facet); Matt Covert, Senior Planner/Project Manager, Donna Keeler, Senior Planner
From:	Alex Capron, AICP, Senior Planner
Project Name:	Clallam County Comprehensive Plan Periodic Update
Facet Project #:	2401.0469.00

Clallam County - Future UGA Growth – Utilities, Land Use, Housing & Transportation Elements

This memorandum ties together various Comprehensive Plan Elements and supporting documentation for Clallam County’s planned growth and realistic growth expectations over the next 20 years. Namely, the County’s Transportation, Land Use (including Land Capacity Analysis), Housing, and Utilities Elements (specifically the County’s Sewer System Plan) are examined and outlined in this memo to evaluate anticipated traffic within Clallam County’s Urban Growth Areas (UGAs). Further, supporting Comprehensive Plan element documentation, including rezone exhibits and transportation modeling results, are listed as technical appendices to better understand where growth and development is expected to occur. Unlike most jurisdictions, these Comprehensive Plan Elements are intertwined into regionally relevant sections of Clallam County Code (CCC), chapters 31.02 through 31.06.

CLALLAM BAY/SEKIU SEWER SYSTEM PLAN

The Clallam Bay/Seki Sewer/Wastewater Facilities Plan was initiated in October 2018 with a recent update completed in May of 2025 and approved by Department of Ecology in June of 2025¹. This plan outlines a change in how the two separate sewer treatment plants function, with capital improvements focusing on removing the existing Clallam Bay Wastewater Treatment Plant (WWTP) from the

¹ Clallam Bay/Seki Sewer Facilities Plan Amendment, Ecology Approval. Plan link:

<https://www.clallamcountywa.gov/DocumentCenter/View/13155/CBSeki-General-Sewer-Facilities-Plan---Amendment---Ecology-Approved?bidId=>

floodplain and instead providing a centralized treatment plant where the Sekiu WWTP exists. While these sewer system improvements increase capacity to the system within the UGA, limited development has occurred recently, with only two new connections established in 2022. Lately, new connection charges have been tied more to enforcement relating to motor home sewer connections rather than new dwelling units, as discussed in further detail below.

TRANSPORTATION ELEMENT

The County’s Transportation Element (codified in CCC 31.02) outlines Level of Service standards within CCC 31.02.410 - .420, touching on intersections that influence state highways within the County. As a technical appendix, the project team modeled intersections within the Sequim UGA as a result of three location-specific rezones shown as Exhibits B

(<https://www.clallamcountywa.gov/DocumentCenter/View/25018/Amending-Title-31-Map-Sequim-Urban-Growth-Area-South>) and C

(<https://www.clallamcountywa.gov/DocumentCenter/View/25017/Amending-Title-31-Map-Sequim-Urban-Growth-Area-North>) illustrating necessary zoning changes to fully accommodate very low and extremely low income housing allocations, per the requirements of RCW 36.70A.070(2) and WAC 365-196-410.

The technical appendix (<https://www.clallamcountywa.gov/DocumentCenter/View/25760/Appendix-L-Traffic-Projection-Volume-Map-with-Roadway-LOS>) models growth in this particular UGA, as Sequim is the only UGA experiencing notable growth and development pressure within the County necessitating further investment and intersection improvements. Conversely, areas where growth is not expected to occur - particularly the Clallam Bay/Sekiu UGA - are discussed below.

LAND USE AND HOUSING ELEMENTS – GROWTH ACCOMMODATION

As discussed above, land use changes are being proposed in the Sequim UGA to accommodate

Table 2: Clallam County 2020 to 2045 Population Growth Allocations

Jurisdiction	2020 Population (Census)	Percent Growth Allocation	Projected Growth	Projected Growth % of Jurisdiction
City of Forks	3,335	5.0%	477	14.3%
Forks UGA	1,302	0.5%	48	3.7%
City of Port Angeles	19,960	33.0%	3,150	15.8%
Port Angeles UGA	2,781	5.0%	477	17.2%
City of Sequim	8,024	31.0%	2,959	36.9%
Sequim UGA	1,577	5.0%	477	30.3%
Clallam Bay/Sekiu UGA	499	0.5%	48	9.6%
Joyce UGA	89	0.0%	-	0.0%
Carlsborg UGA	918	3.0%	286	31.2%
Unincorporated Rural	38,670	17.0%	1,623	4.2%
Total County Growth by 2045:			<u>9,545</u>	

projected housing growth and meet the County’s housing planning obligations. By contrast, the Clallam Bay/Sekiu UGA is an example of an area absent nearby urban areas and employment centers that, as a result, projects to experience little growth over the past 20 years, accommodating less than 1 percent of the growth allocation for the County (See LCA Table 2 excerpt at left).

In addition, Clallam Bay/Sekiú experienced an average population loss of 3.41 percent between 2000 and 2020, reflecting this static demographic situation².

Even so, the proposed rezone (see link:

<https://www.clallamcountywa.gov/DocumentCenter/View/25019/Amending-Title-31-Map-Clallam-Bay-Sekiú-Urban-Growth-Area>) from the Urban Residential High (one dwelling unit per 12,500 square feet) to Urban Moderate Density (15 dwelling units per acre) allows for roughly 3,124 units of additional housing (as referenced within the LCA to demonstrate how the County is meeting its required housing allocations) within the Clallam Bay/Sekiú UGA. Further, the Sewer System Plan for Clallam Bay/Sekiú and future capacity are not an inhibitor for growth, with excess capacity ready once the Sekiú treatment plant expansion comes online. Part of this is due to ongoing discussions with the Clallam Bay Corrections Center to re-route their facility's sewer to the Sekiú treatment facility. Relating to sewer costs and addressing middle housing regulations, the proposed ordinance incorporating houses on wheels and RV uses is an example of a tool utilized more to capture rising utility costs for appurtenant RV sewer connections, more so than middle housing demand (see 11/24/25 draft: <https://www.clallamcountywa.gov/DocumentCenter/View/24695/DCD-RV-Use-Ordinance-BE-11-24-25?bidId=>). In sum, there are many factors at play regarding past population trends and low projected growth in both jobs and housing within the Clallam Bay/Sekiú UGA that indicate growth exceeding 1 percent is unlikely.

In the absence of demand and relative isolation from other urban centers, a growth of roughly 100 housing units would be on the higher end of what would be expected over the next 20 years in the Clallam Bay/Sekiú UGA even with the proposed rezone. In addition, critical areas regulations supported by the Straits Regional Clallam County Code (CCC) 31.05 Policy Worksheet anticipates retaining small town character, where a strong emphasis on environmental protection and resource-based community will continue.

As a result of the factors discussed above, further transportation and capital facilities analysis is not required for the Clallam Bay/Sekiú UGA. The UGA's boundaries are not proposed to change, but the rezone from Urban Residential High to Urban Moderate allows a range of housing types and densities better suited to meeting the housing needs of the region's current and future households.

² Draft Chapter 31.05 CCC, Straits Regional Plan, page 10 of 82. Accessed December 2025.

many are in danger of being damaged or lost because of ongoing development. Wherever possible, sites should be permanently preserved for scientific study and/or public observation consistent with 36 CFR 800 and Chapter 27.53 RCW. If the presence of an archaeological site is unknown, then a survey should be conducted by an archaeologist.

(c) Proposed development on or adjacent to an identified archaeological, historic, or cultural site should be designed and operated to be compatible with continued protection of the archaeological, historic, or cultural site.

(d) The location of historic, cultural, and/or archaeological sites/resources should not be disclosed to the general public unless adequate provisions can be put in place to ensure long-term protection and preservation of such sites/resources.

(eb) Cooperatively plan, implement, and maintain corridor management plans for all proposed and existing Washington State Scenic and Recreational Highways (Hwy. 101 and Hwy. 112). Identify the long-term landscape character desired for scenic and recreational highways and their related cultural resources, and implement landscape maintenance practices appropriate to ensure the resources' lasting character.

(fe) Discourage additional commercial development parallel (immediately adjacent) to scenic and recreational highways where it has a negative impact on the scenic character of the route.

(23) Policy 23. Clallam County shall recognize tribal nations as co-managers in adoption of the Comprehensive Plan and development regulations. Affected tribal nations shall be notified of development applications prior to action and be given the opportunity to comment on the project's impact to tribal rights, as required by the State Environmental Policy Act, the Clallam County Shoreline Master Plan, Executive Order 21-02, SEPA, RCW27.53, RCW 68.60, WAC 25-48, WAC 25-46, RCW 42.56.300, RCW 27.44, RCW 68.50, etc..

31.02.410 Transportation – Background issues.

(1) The transportation system, as defined by the Growth Management Act, is composed of air, water, land transportation facilities and services, including highways and streets, paths, trails, sidewalks, transit, airports, ports, and rail. Our transportation or circulation system should function to serve our mobility of goods and people based on land use patterns. The system

should not be improved to strictly serve the single occupant vehicle if we aspire to meet growth demands, with conservative financial expenditures and a sensitivity to the environment. The transportation system should encourage alternative “modes” of transportation and convenient “intermodal” connections from one mode of travel to another.

The County is required to comply with concurrency by developing a concurrency management system for roads and transit routes. According to the Growth Management Act (RCW [36.70A.070](#)), “Local jurisdictions must adopt and enforce ordinances which prohibit development approval if the development causes the level of service on a transportation facility to decline below the standards adopted in the transportation element of the Comprehensive Plan, unless transportation improvement or strategies to accommodate the impacts of development are made concurrent with the development.”

Level of service (LOS) standards are the gauge to measure whether transportation facilities are performing at acceptable levels and a way to identify capacity deficiencies. Please see Table 7 for description of level of service and Figure 31.02.410(A) for a graphic example. When level of service standards are adopted, they are used to gauge whether transportation improvements and strategies required to serve development are in place, or there is a financial commitment to have them in place within six years of development. This is otherwise known as concurrency: having necessary transportation facilities available to serve new development no later than the impacts of the new development.

When it is determined that a transportation facility will be deficient due to future development, there are five ways of complying with concurrency:

- (a) Program funding within six years to maintain the facility at performance standard;
- (b) Require the developer to bring the facility up to standard;
- (c) Adjust land use plans to reduce demand caused by growth;
- (d) Deny the individual development permit; or
- (e) Implement alternative transportation demand management strategies, such as multimodal enhancements which reduce the demand on the transportation facility.

It is also possible to change the standards through amendment of the Comprehensive Plan. Changing the standards should be considered only within the context of all the policies and goals of the Comprehensive Plan and not be a result of individual hardships.

Table 7. Roadway Level of Service Definitions

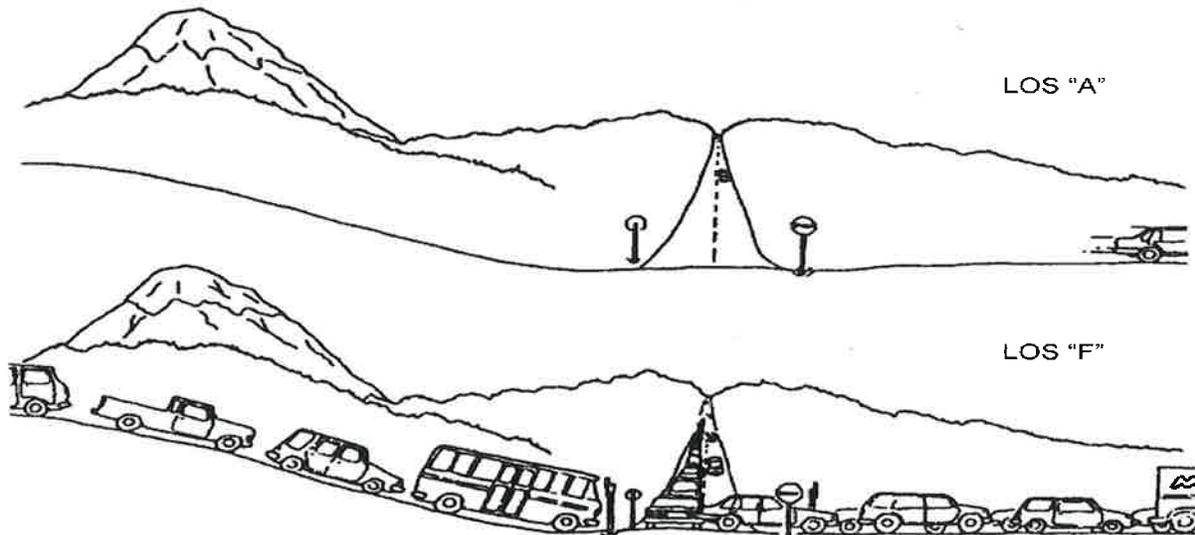
LEVEL OF SERVICE	DEFINITION
A	<p><u>Describes free-flow operations. FFS prevails on the freeway or multilane highway, and vehicles are almost completely unimpeded in their ability to maneuver within the traffic stream. The effects of incidents or point breakdowns are easily absorbed.</u>Describes a condition of free flow with low volumes and high speeds. Freedom to select desired speeds and to maneuver within the traffic stream is extremely high. Stopped delay at intersections is minimal.</p>
B	<p><u>Represents reasonably free-flow operations, and FFS on the freeway or multilane highway is maintained. The ability to maneuver within the traffic stream is only slightly restricted, and the general level of physical and psychological comfort provided to drivers is still high. The effects of minor incidents are still easily absorbed.</u>Represents reasonably unimpeded traffic-flow operations at average travel speeds. The ability to maneuver within the traffic stream is only slightly restricted and stopped delays are not bothersome. Drivers are not generally subjected to appreciable tensions.</p>
C	<p><u>Provides for flow with speeds near the FFS of the freeway or multilane highway. Freedom to maneuver within the traffic stream is noticeably restricted, and lane changes require more care and vigilance on the part of the driver. Minor incidents may still be absorbed, but the local deterioration in service quality will be significant. Queues may be expected to form behind any significant blockages.</u>In the range of stable flow, but speeds and maneuverability are more closely controlled by the higher volumes. The</p>

LEVEL OF SERVICE	DEFINITION
	<p>selection of speed is now significantly affected by interactions with others in the traffic stream, and maneuvering within the traffic stream requires substantial vigilance on the part of the user. The general level of comfort and convenience declines noticeably at this level.</p>
D	<p>Level at which speeds begin to decline with increasing flows, with density increasing more quickly. Freedom to maneuver within the traffic stream is seriously limited, and drivers experience reduced physical and psychological comfort levels. Even minor incidents can be expected to create queuing, because the traffic stream has little space to absorb disruptions. Represents high-density, but stable flow. Speed and freedom to maneuver are severely restricted, and the driver or pedestrian experiences a generally poor level of comfort and convenience. Small increases in traffic flow will generally cause operational problems at this level.</p>
E	<p>Describes operation at or near capacity. Operations on the freeway or multilane highway at this level are highly volatile because there are virtually no usable gaps within the traffic stream, leaving little room to maneuver within the traffic stream. Any disruption to the traffic stream, such as vehicles entering from a ramp or an access point or a vehicle changing lanes, can establish a disruption wave that propagates throughout the upstream traffic stream. Toward the upper boundary of LOS E, the traffic stream has no ability to dissipate even the most minor disruption, and any incident can be expected to produce a serious breakdown and substantial queuing. The physical and psychological comfort afforded to drivers is poor. Represents operating conditions at or near the maximum capacity level. Freedom to maneuver within the traffic stream is extremely difficult, and it is generally accomplished by forcing a vehicle or pedestrian to "give way" to accommodate such maneuvers. Comfort and convenience levels are extremely poor, and driver or pedestrian frustration is generally high.</p>

LEVEL OF SERVICE	DEFINITION
	Operations at this level are usually unstable, because small increases in flow or minor disturbances within the traffic stream will cause breakdowns.
F	Describes forced or breakdown flow, where volumes are above theoretical capacity. This condition exists wherever the amount of traffic approaching a point exceeds the amount which can traverse the point. Queues form behind such locations, and operations within the queue are characterized by stop-and-go waves which are extremely unstable. Vehicles may progress at reasonable speeds for several hundred feet or more, then be required to stop in a cyclic fashion.

Source: ~~Transportation Research Board, Transportation Research Board, Highway Capacity Manual, 7th Ed., 2002 Special Report 209, Washington, D.C., 1985~~

Figure 31.02.410(A).



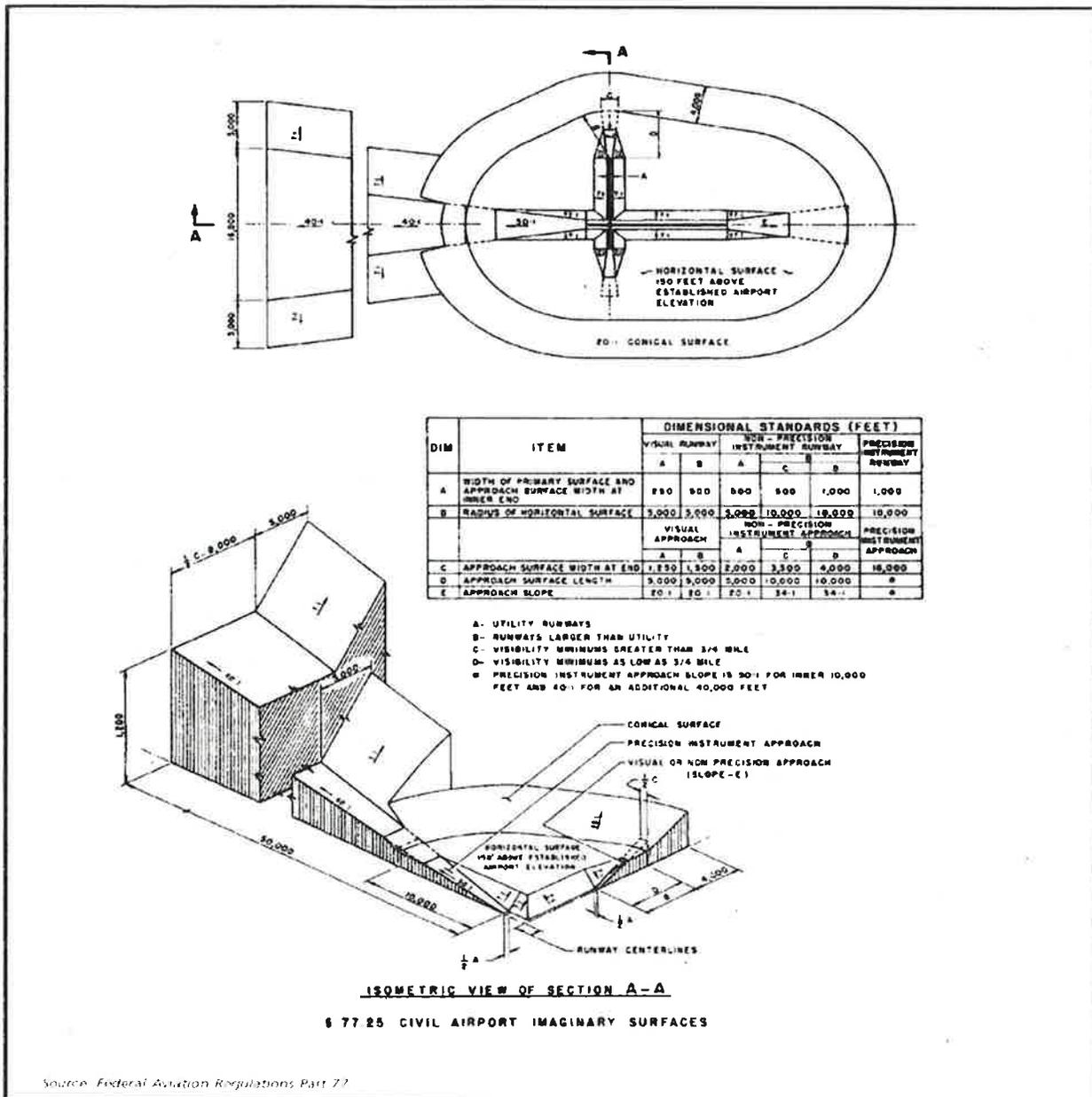
This chapter addresses transportation goals and policies that prioritize moving people and goods at an acceptable level of service, regionally and locally. The chapter also guides an

effective concurrency management system into place that allows growth where transportation facilities exist and takes advantage of travel modes which minimize maintenance costs and eliminate system expansion needs.

(2) The Growth Management Act requires local jurisdictions to designate public use airports as essential public facilities (RCW [36.70A.200](#)). Additionally, local jurisdictions must discourage incompatible land uses adjacent to public use general aviation airports (RCW [36.70A.547](#)). The Washington State Department of Transportation – Aviation Division is charged with providing technical assistance to local governments to develop comprehensive plans and development regulations consistent with these requirements. The intent of the requirements is to protect the safety of people on the ground and in aircraft, the current operations of the airport, and the future viability of the airport.

(3) Title [14](#), CFR, Part 77 of the Federal Aviation Regulations (FAR) “Objects Affecting Navigable Airspace” (referred to herein as FAR Part 77) establishes standards for determining obstructions in navigable airspace. Part 77 provides horizontal and vertical dimensions for airspace protection surfaces above and around each airport runway. The horizontal size and vertical slope of the airspace protection surfaces are based on the category of the runway. The category of runway is based on the most precise type of approach available or planned for that runway. See Figure 31.02.410(B) for a diagram of airspace protection surfaces.

Figure 31.02.410(B) – FAR Part 77 Diagram



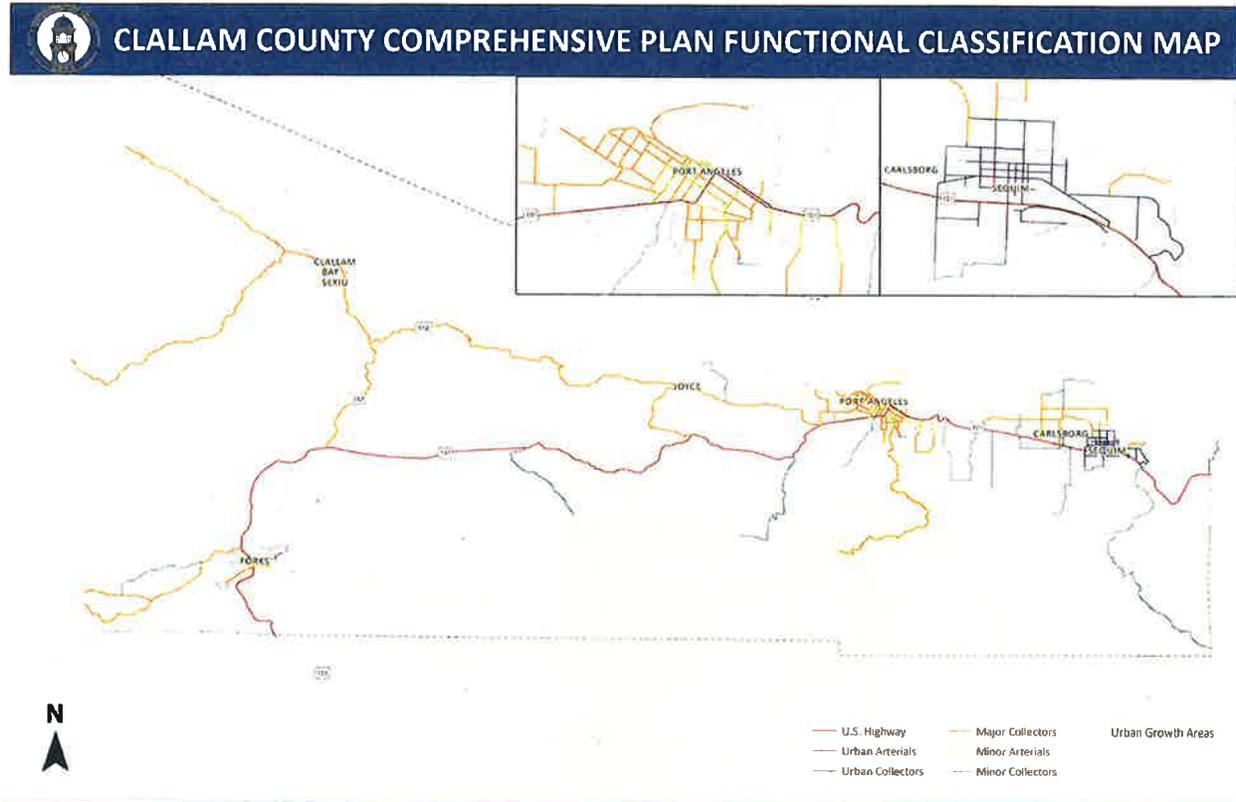
31.02.415 Transportation – Inventory and Operations.

The Clallam County transportation system provides a wide variety of travel options for transportation by land, water and air. Today’s travel options include private vehicle, ferry, public transportation, bicycle or airplane. The main highway travel corridor through Clallam County is Highway 101 which carries approximately 14,000 vehicles per day east of Sequim, approximately 20,000 vehicles per day in the Sequim area, 30,000 vehicles per day in the Port

~~Angeles area, and approximately 2,500 vehicles per day west of Port Angeles up to 20,600 vehicles per day.~~ The State highway and arterial road network allows access to all populated areas of the County and to Olympic National Park destinations. The ferry connection to Victoria, British Columbia and major air transportation facilities are located in Port Angeles. Small aircraft can be accommodated at several air strips located throughout the County. Public transportation is provided by the Clallam Transit bus system and connects with Jefferson County transit service. A system of existing roadways and bicycle trails enables County residents and visitors to use non-motorized travel options to access urban and rural locations in the County.

(1) *Roads.* The Clallam County road system consists of urban arterials and urban collectors, minor arterials, major and minor collectors, and rural roads. Roads approaching capacity deficiency are occurring along "rural roads" which no longer carry rural traffic counts. The roadway classifications are shown in Figure 31.02.410(C), below. Substandard roads are prevalent in heavily short platted areas of the County. Points of congestion are typical at intersections entering and leaving Sequim and east of Port Angeles along State Highway 101. Clallam County transportation planning in conjunction with the Peninsula Regional Transportation Planning Organization has developed a gauge of reference to monitor and describe the deficiencies of roads. This "level of service" will indicate when a road or intersection has reached its threshold of performance.

Figure 31.02.415(C) – Clallam County Roadways, Functional Classification Map



Presently, the Clallam County Road Department maintains 4897.32 miles of County public road, 39 bridges and approximately 50 miles of active transportation corridor. Road inventory remains consistent in terms of road miles. With the increase in tourist activity seen over the past few decades, focus has been on maintaining the roads in the current inventory as well as reconstructing more heavily traveled roads to allow safer and more efficient travel. This is accomplished through repaving, shoulder widening, slope flattening and alignment straightening. The public road system is inventoried and monitored through the Graphical Information System-Mobility program (GIS-Mo).

Maintenance of the road system is aided by the implementation of a new pavement management system which involves videotaping the County roads. An up-to-date inventory of the County roads has been completed which logs the visual condition of roads and systematically records road characteristics in the computerized County Road Information System (CRIS). Road improvement programming and transportation planning is supported by the CRIS.

Bridge inventory has been increasing in recent years and is expected to continue due to the increase in funding available for fish passage barrier removal. Culverts that have been determined to impede migration of aquatic organisms to a higher degree are being replaced with larger drainage structures that classify as bridges. These bridges are inventoried and monitored through the National Bridge Inventory.

The active transportation corridor, known as the Olympic Discovery Trail, is expanding. Approximately 50 miles have been identified as segments that need constructed in order to create a continuous trail that runs the length of Clallam County. Funding for these segments is actively being pursued.

~~The federal financing of roads has changed dramatically with the passage of the Intermodal Surface Transportation Efficiency Act of 1991, or ISTEA (pronounced "ice tea"). With this new federal assistance comes a new emphasis in planning for the entire transportation system, not just roadway components. Traditional roadway programs must be viewed as just one of many ways in which transportation deficiencies are handled. The classification of roads for service function becomes important when administering ISTEA. A road classified as rural will not compete nation-wide for financing as will an arterial road. Complex highway financing mechanisms will lead elected officials and planners to search for other means of meeting transportation needs such as bicycle and pedestrian facilities, carpools and vanpools, and public transportation.~~

(2) *Port, Marine Terminals and Moorage.* The Port of Port Angeles was created in 1922 and began operations shortly thereafter. Currently, the Port provides various transportation related facilities which include marine terminals, industrial districts and airports. The Port Angeles Harbor is the westernmost natural deepwater harbor in the Puget Sound which requires no dredging. The Port currently owns and operates two deep-water terminals with a total capacity of five vessels. The Port Angeles Boat Haven covers 16.1 acres on the south shore of the Port Angeles Harbor. Moorage space accommodates approximately 560563 commercial and recreational vessels. ~~The marina provides 244 permanent moorage slips, plus 22 transient slips, and has an ultimate capacity of 355 slips.~~

The John Wayne Marina is located at Pitship Point on Sequim Bay. The marina lies within an area recently annexed to the City of Sequim. The marina provides 244 permanent moorage slips, plus 22 transient slips, and has an ultimate capacity of 355 slips. The facilities include water, electricity, fuel, a boat launch, a public service building, and recreational access.

Additional marina and moorage facilities are found in Sekiu, Neah Bay, and LaPush. These facilities provide moorage for commercial and recreational fishing, charters, and may provide greater opportunities for cruise boats, etc.

(3) *Ferries.* Black Ball Transport has provided ferry service between Victoria, B.C. and Port Angeles since 1959. The ferry, M.V. Coho, has capacity for 130 passenger vehicles on board and the ridership in 1993 carried 138,407 vehicles. The number of crossings per day varies with the season. The winter schedule is limited to one round-trip crossing, whereas the summer tourist season demands four round trips per day. The Coho accommodates over 550,000 passengers per year and transports 4,000 bicyclists. The trip crosses the Strait of Juan de Fuca in one hour and 35 minutes.

The Victoria Express is a walk-on passenger-only service and can traverse the strait in 55 minutes. The newly remodeled vessel can seat 148 passengers. Reservations are taken for the four daily round trips in the summer season and for the two round trips during May 15th – June 19th and September 8th – October 12th.

(4) *Airports.* There are five public use general aviation airports in Clallam County, shown on Figure 31.02.415(A) and described in subsections (4)(a) through (f) of this section, as well as 10 privately owned private use airports and three private use heliports listed in subsection (4)(g) of this section.

(a) Sequim Valley Airport, located three miles west of the City of Sequim, is a privately owned, public use general aviation airport. The airport has one runway, 09/27, suitable for single-engine to twin-turboprop aircraft. The majority use is privately owned, single-engine aircraft for recreational use. In 2003, there were 26 single-engine airplanes based at the airport with 8,000 annual operations. Navigational aids present include lighted runway, rotating beacon, unlighted wind cone, and a segmented circle. Facilities include aviation fuel, aviation maintenance and repair, a 420-by-55-foot T-hangar with 20 bays, 80-by-60-foot maintenance hangar, and a 15-by-50-foot operations center that serves private plane owners and operators. In 2005, there were limited commercial freight operations, charter operations, and no commercial passenger services. The airport is used for Medivac, firefighting, and Coast Guard operations.

(b) William R. Fairchild International Airport is located in the City of Port Angeles and owned by the Port of Port Angeles. The airport is a primary commercial service airport suitable for single-engine recreational aircraft, twin-turboprop aircraft, commercial freight

operations, and occasionally larger aircraft as large as Boeing 737s. Navigational aids present include instrument landing system (ILS), visual approach slope indicator (VASI), non-directional beacons (NDB), runway end identifier lights (REIL), and medium intensity approach lighting system (MALSR). Commercial operations include aircraft repair and inspection, charter flights, flight instruction, freight operations, passenger service to King County International Airport – Boeing Field, and 64 T-hangers and T-sheds. The 5,000-square-foot terminal accommodates a restaurant, gift shop, and rental car service. The airport is used for Medivac, firefighting, and Coast Guard operations. The Port of Port Angeles has plans for additional hangars, commercial and industrial developments, and airport facility improvements. The Port sponsored an Airport Layout Plan completed in 1988 and a Noise Compatibility Study completed in 1986.

(c) Sekiu Airport is located near the Strait of Juan de Fuca adjacent to the community of Sekiu/Clallam Bay. The airport is owned by the Port of Port Angeles and is available for public use. The airport has one runway, 08/26, suitable for single-engine aircraft. The majority of use is privately owned, single-engine aircraft for recreational purposes. In 2003, there were two single-engine airplanes based at the airport with 498 operations. Navigation aids present include lighted runway, visual approach indicator, windsock, and segmented circle. Facilities include three 80-by-40-foot T-hangars and a public restroom. No commercial freight, passenger, or other commercial flight services were operational in 2005. The airport is used for Medivac, firefighting, and Coast Guard operations. The Port of Port Angeles sponsored a 1996 study titled “Sekiu Airport – Safety, Liability and Management Issues.”

(d) Forks Municipal Airport is a public use general aviation airport located in and owned by the City of Forks. The airport has one runway, 04/22, suitable for single-engine aircraft. In 2003, there were five single-engine airplanes based at the airport with 13,600 annual operations. Navigational aids present include lighted runway, unlighted wind cone, and a segmented circle. Other facilities include eight tie-downs, 15 hangars, and contract helicopters. No commercial freight, passenger, or other commercial flight services were operational in 2005. The airport is used for Medivac, firefighting, and Coast Guard operations. The City of Forks sponsored an Airport Layout Plan in 1997 that included a complete airport and airspace information as well as location of future aviation expansion area.

(e) *Quillayute Airport.* The Quillayute Airport is a former Naval Auxiliary Air Station located approximately 10 miles west of the City of Forks. The facility was deeded to the City of Forks by the Washington State Department of Transportation – Aviation Division in March, 1999. The airport serves general aviation needs, and is suitable for single-engine and twin-turboprop aircraft. The airport has two concrete runways, 04/22 and 12/30. In 2003, there were five single-engine airplanes based at the airport with 6,700 annual operations. Navigational aids present include a windsock and a segmented circle. No commercial freight, passenger, or other commercial flight services were operational in 2005. The airport is used for Medivac, firefighting, and Coast Guard operations. The City of Forks sponsored a land use plan in 2001 and drafted an airport master plan to address future development and infrastructure improvements for the airport. The airport land use plan also addressed land use compatibility surrounding the airport. In 2002, the airport received a grant funded jointly by WADOT – Aviation Division and the FAA to resurface runway 04/22.

(f) *Public Use General Aviation Airport Runway Dimensions.*

Table 31.02.415(A). Public Use General Aviation Airports

Airport	Runway	Length (feet)	Width (feet)	Elevation¹ (feet)	Airport Property² (acres)
Sequim Valley	09/27	3,500	40	144	150 ³
William R. Fairchild	08/26 ⁴	6,350	150	288	797
William R. Fairchild	13/31	3,250	50	288	797
Sekiu	08/26 ⁵	2,890	50	352	25
Forks Municipal	04/22	2,400	75	297	101

Airport	Runway	Length (feet)	Width (feet)	Elevation ¹ (feet)	Airport Property ² (acres)
Quillayute	04/22 ⁶	4,210	150	194	765
Quillayute	12/30 ⁷	4,700	200	194	765

¹ Above mean sea level.

² Airport property is approximate.

³ 50 acres is owned by the airport and 100 acres leased.

⁴ Runway 26 has a displaced threshold of 1,350 feet.

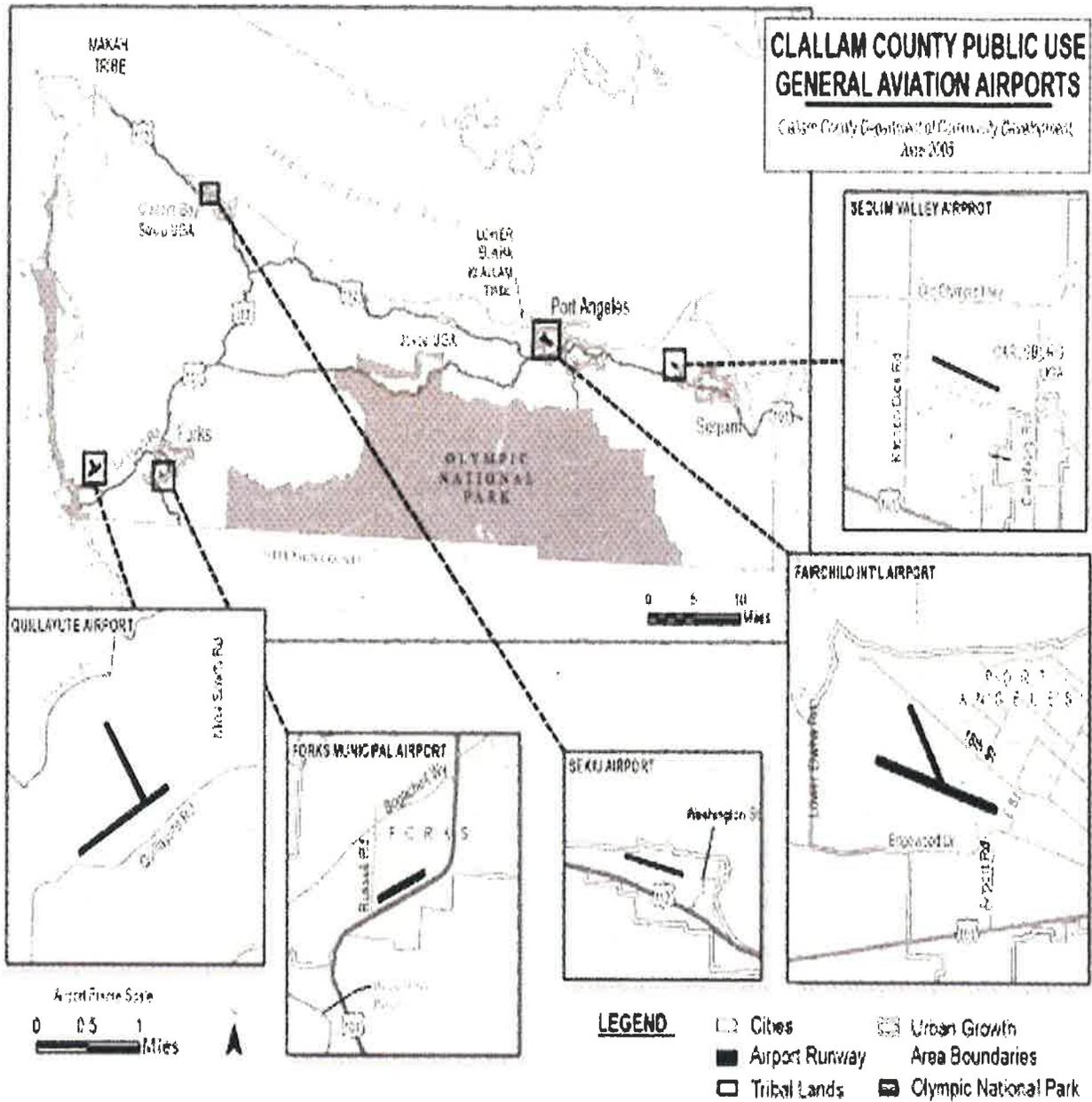
⁵ Runway 26 has a displaced threshold of 790 feet.

⁶ Runway 22 has a displaced threshold of 1,089 feet.

⁷ Runway is currently closed due to surrounding tree obstructions and pavement issues.

(g) Clallam County’s privately owned private use airports include Lawson Airpark Airport, Thompson Airport, Big Andy Airport, Blue Ribbon Airport, Swanton Ultralight Flightpark, Grand View International Airport, Rake’s Glen Airport, Harbord Field Airport, and Diamond Point Airport. Clallam County’s privately owned private use heliports include Eclipse Heliport and Thompson Heliport. Permission is required for landing at these airports and landing fees and/or other fees may apply. Heliport use is limited to hospital operations at Olympic Memorial Hospital Heliport. Runway use is limited to Coast Guard operations at the Port Angeles Coast Guard Air Station.

Figure 31.02.415(A).



(5) *Transit.* The Clallam Transit System provides complete bus service throughout Port Angeles and to destinations such as Forks, Clallam Bay, LaPush, Neah Bay and Diamond Point. The fixed-route service consists of 124 scheduled routes weekday routes, 10 Saturday routes and two Sunday routes. An additional seasonal fixed route provides nine daily trips to Hurricane Ridge. These routes are broken into 3 service categories: intercity, urban, and rural. Two microtransit routes provide linkage to the cities, unincorporated areas, and tribal nations within Clallam County. he “Bus” makes intercity connections in Sequim with Jefferson Transit for transportation to Port Townsend and other points in Jefferson County. The Strait Shot 123 service connects Port Angeles and Sequim with Poulsbo and the Bainbridge Island Ferry

~~Terminal in Kitsap County Highway 101 commuter routes are available between Port Angeles and Sequim. Service standards apply to the three categories of routes based on performance. The performance indicators are used to show ridership trends or quality of ride. The physical and mentally handicapped and 80+ senior citizens-residents have wheelchair accessible doorstep service available to them via Paratransit. People not capable of using Clallam Transit regular service can call a day in advance for Paratransit door-to-door travel. The Paratransit service is provided by two private, nonprofit corporations on contract with Clallam Transit System.~~

~~Olympic National Park has worked in cooperation with Clallam Transit System on a pilot project to provide public transportation to Hurricane Ridge. The project was a huge success since bus service from Port Angeles Visitor Center to Hurricane Ridge Lodge was scheduled on a February holiday weekend. Parking lot congestion at Hurricane Ridge was alleviated and safety conditions along the route were improved. The Olympic National Park and Clallam Transit desire to provide similar transit service in the future. The Park's most recent concession, The Paddlewheeler, allows the ferry boat users to take a bus shuttle from outside the Olympic National Park boundary to the Lake Crescent boat launch. This transportation service removes unnecessary vehicle trips along a deficient road segment of SR 101 and eliminates the need for parking.~~

Clallam County has three park-and-ride lots operating and serving the public in the west portion of the County. Sappho, Forks and Laird's Corner park-and-ride lots are served by Clallam Transit System routes 14, 15 and 16. Other park-and-ride lots to the west of Port Angeles have been abandoned. The park-and-ride lot experiencing the highest degree of success is at Forks. It was developed in cooperation with the State Department of Transportation, the city of Forks and Clallam Transit System. It serves residents in the Forks area who commute to LaPush, Clallam Bay and Neah Bay. A vanpool is also operating from Clallam Bay serving the employees of Clallam Bay Correction Center.

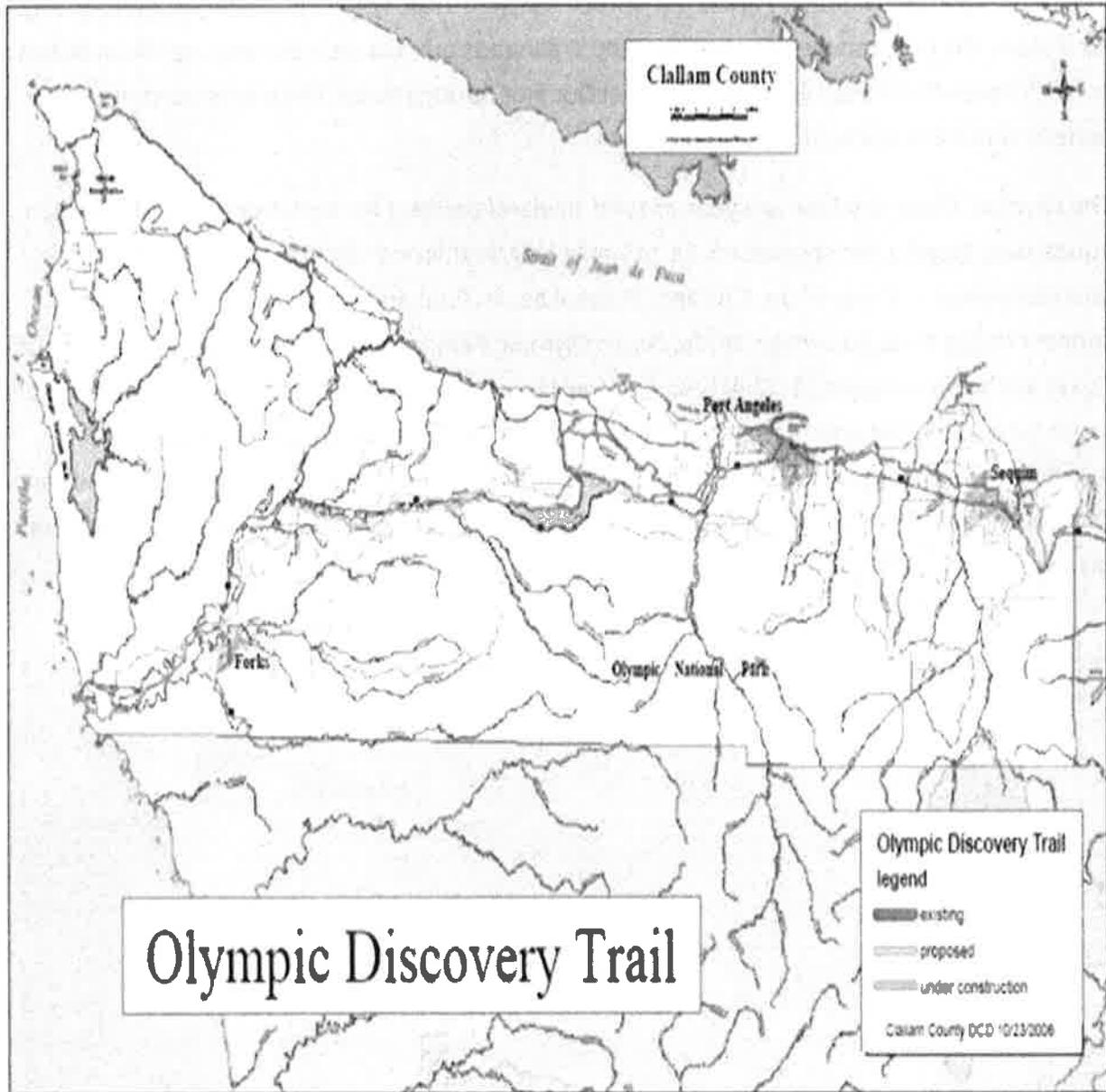
Clallam Transit System is installing bicycle racks on buses and also at stationary locations. The Bicycle Access Program makes linkages with Jefferson Transit System which already has the equipment installed. Recreational bicyclists have the option to become transit riders and lengthen journeys.

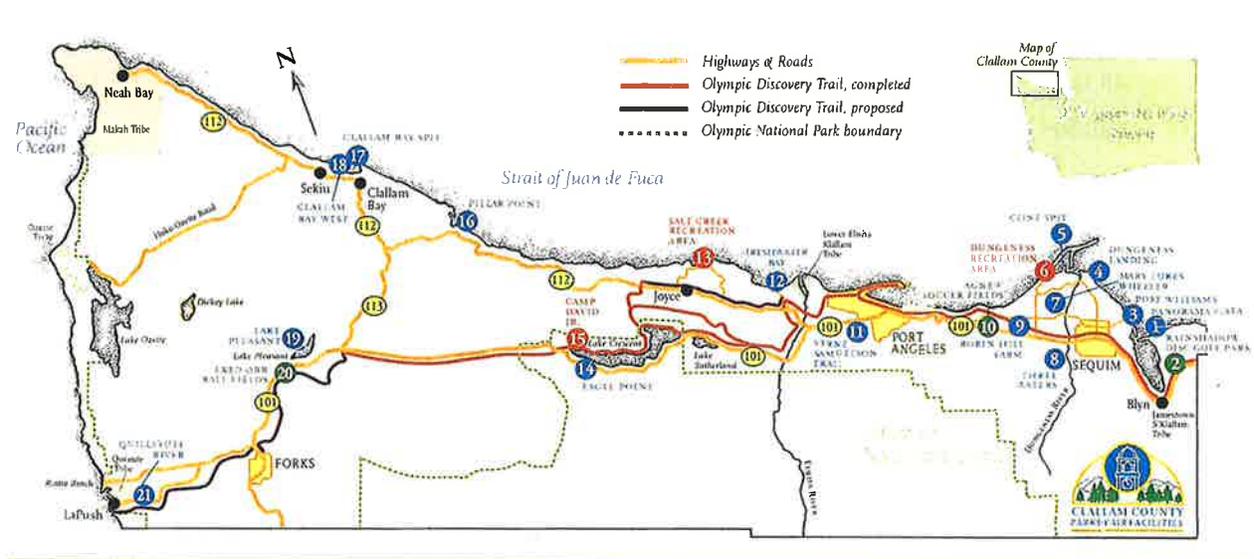
(6) *Non-Motorized Transportation.* Numerous trails are present in the Olympic National Park system and some provide connections with the Clallam County transportation system. A unique

trail to the Olympic National Park is the Spruce Railroad Trail. Formerly a railroad right-of-way, it runs along the north shore of Lake Crescent. Trailheads are located near the Log Cabin Resort on East Beach Road and Highway 101 at Sol Duc Hot Springs Road. The trail is used by pedestrians, horseback riders, and bicyclists.

The Olympic Discovery Trail is a year-around, lowland corridor for non-motorized (pedestrian, equestrian, bicycle) transportation. Its 145-mile length, utilizing significant segments of the abandoned right-of-way of the Chicago, Milwaukee, St. Paul and Pacific Railroad line, will connect the population centers of the North Olympic Peninsula from Puget Sound to the Pacific Coast as shown in Figure 31.02.415(B). The trail is a scenic, easily accessible and safe alternative route for commuters and recreationists. It includes a "touring" route for commuting and traveling cyclists and a western County Cross County Foothills Trail for the off-road enthusiast. The County should work closely with each of the connecting municipalities to ensure that the respective trails and feeder connections are clearly signed and fully accessible.

Figure 31.02.415(B) - Olympic Discovery Trail.





31.02.420 Transportation – Goals and policies.

(1) Roads and Highways.

(a) [Policy No. 1.J] Preserve and enhance Highway 101 corridor.

- (i) Promote year-round safe commuter bicycling in urban growth areas with regularly maintained bicycle facilities and appropriately designed shoulders on Highway 101.
- (ii) Review new traffic circulation patterns to disperse or separate traffic from congested segments.
- (iii) Encourage the analysis of freight scheduling to split traffic use and reduce peak hour conflict.
- (iv) Enhance the scenic nature of Highway 101 by:
 - Developing consistent information signage;
 - Prohibiting off-premises sign construction;
 - Adoption of corridor management plans along the scenic designated areas;
 - Discourage additional commercial or industrial development immediately adjacent to the areas designated as scenic.

(v) Deciduous street trees, landscape and pedestrian amenities should be included in all future Highway 101 upgrades or private development in urban areas as per matrix cell RH1-7 (see CCC [31.02.435](#) for the Design Standard Policy Matrix).

(vi) For local access roads where there exists a clear public benefit and local circumstances support, traffic calming techniques, such as raised crosswalks, variation in horizontal alignments, and other design features, should be considered consistent with adopted AASHTO Guidelines; provided, said design standards do not conflict with locally-adopted design standards.

(vii) Passing lanes should be planned as per matrix RH1-8.

(viii) Encourage the marking of historic and cultural sites along or adjacent to the Highway 101 corridor.

(b) ~~[Policy No. 2.]~~ Improve the aesthetics of scenic Highway 101 corridor.

(i) Encourage placing new and upgraded service utility lines less than twelve (12) kilovolts (KV) underground as per matrix cell RH2-1. When new utility lines over twelve (12) KV are constructed, they should be placed on the south side of the road to reduce icy pavement conditions.

(ii) Encourage highway landscaping to support the rural character and reduce visual impact of parked vehicles, equipment, etc., along the highway as per matrix cell RH2-2. Consider retaining native vegetation as a priority.

(iii) New fence construction adjacent to road right-of-way should not detract from the rural character as per matrix cell RH2-3.

(iv) Improve aesthetics of the scenic Highway 101 by the prohibition and eventual elimination of off-premises commercial signs (e.g., billboards). Prioritize the removal of off-premises signs, with signs outside urban growth areas being considered a high priority.

(c) ~~[Policy No. 3.]~~ Increase regional mobility of goods, services and passengers and increase access to regional attractions while preserving and enhancing the urban commercial corridor.

(i) Insist upon the State Legislature and Department of Transportation to complete improvements in the Sequim-Dungeness subregion as described in the final environmental impact statement for SR 101, Palo Alto to O'Brien Road.

~~(ii) Review need for new highway alignment to improve circulation and regional mobility in the Port Angeles subregion. Proactively communicate and coordinate with the Washington State Department of Transportation to identify and plan for US 101 Highway corridor improvements, new alignments, and bypass routes needed to improve circulation, address congestion, provide resilience, and maintain arterial flow and efficient regional mobility throughout the county.~~

~~(iii) Review the need to have a new highway connection from Neah Bay to Ozette along or near the coast. Assess options and feasibility of alternative/emergency access routes for the SR 112 north coast area, including an alternative route from Neah Bay to Forks.~~

~~(iv) Continue to participate in coordinated transportation planning through the Peninsula Regional Transportation Planning Organization to ensure regional consistency with other government agencies.~~

(d) ~~[Policy No. 4.]~~ Preserve existing road and highway system.

(i) Highway level of service will be calculated for planning purposes consistent with the Peninsula Regional Transportation Planning Organization.

(ii) Highway level of service for County roads will have a minimum acceptable level of "C" for rural and urban roads. (See Figure 1.)

(iii) Highway level of service for State highways will be consistent with the Peninsula Regional Transportation Planning Organization. LOS = "D" for urban highways and tourist corridors. LOS = "C" for rural highways.

(iv) A computer transportation model to forecast future road deficiencies and a transportation inventory data base will be maintained for the County and municipal jurisdictions to monitor growth and forecast predictions and also become the basis for a concurrency management system. (See CCC [31.02.425](#) for discussion of forecasting methodology.)

(v) Ensure the continued viability of Highway 112 as a major transportation route by protecting segments in geologically unstable areas (i.e., land slides).

(vi) Continue to encourage volunteer help to maintain roads.

(vii) In collaboration with Peninsula Regional Transportation Planning Organization, adopt a multimodal level of service policy for state Highways of Regional Significance that is compatible with the WSDOT multimodal level of service policy for Highways of Statewide Significance.

(e) ~~[Policy No. 5.]~~ Develop rural design standards which enhance strong rural character and neighborhood identity while providing adequate safety.

(i) Design rural major collectors and higher classified roadways to accommodate various transit vehicles according to transit comprehensive plans.

(ii) All road structural improvements should be coordinated with Paratransit services as required by the American Disabilities Act (ADA) to meet driving maneuverability needs).

(iii) Design standards for County roads should adhere to the standards set forth in the "City and County Design Standards," adopted by WSDOT pursuant to RCW [35.83.030](#) and RCW [43.32.020](#), as now or hereafter amended. As of this date, the following standards are adopted:

ADT	Below 150	150 – 400	401 – 750	751 – 1,000	1,001 – 2,000	2,001 and over
Roadway Width	20 –24 ft.	24 ft.	26 ft.	28 ft.	34 ft.	40 ft.
Lane Width	10 ft.	10 ft.	10 ft.	10 ft.	11 ft.	12 ft.

(iv) All rural federal routes should adhere to minimum WSDOT design standards but not exceed the given standards per criteria unless warranted by a specific land-use impact.

- (v) The design and construction of private roads should allow for flexibility while meeting minimum safety requirements for emergency vehicles. The developer should be responsible for improvements to bring the private road up to public road standards if future public agency acceptance is desired.
- (vi) To minimize conversion of land designated as commercial forestry or commercial forestry mixed, unpaved County roads in these designations should be returned to private or State ownership, or remain unpaved. The County should not construct or accept as a County facility any road in these designations if the road performs to a local access or minor collector functional classification.
- (f) [~~Policy No. 6.~~] Manage access to the transportation system.
 - (i) Periodically, review the State access management classification for State highways to advise changes towards comprehensive planning goals.
 - (ii) The following standards for access to State highways and County arterials shall be followed:
 - (A) New businesses locating in designated commercial and industrial zones that do not have access to a County road shall combine accesses with neighboring business to the maximum extent possible when adjacent to State highways.
 - (B) No new commercial or industrial zone shall be established along Highway 101 without access to a County road.
 - (C) No new subdivisions or short subdivisions in commercial and industrial zones with County road access shall be granted access to State highways.
 - (D) All new subdivisions or short subdivisions in any land use classification with access to a County arterial shall be allowed only one access point to the County arterial at a location approved by the County Engineer.
 - (iii) Promote the consolidation of access and the development of ingress/egress easements along State highways and the County arterial system as per matrix cell RH6-2.

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- (iv) Provide incentives to adjacent property owners (such as setback flexibility) to establish mutually shared driveways. Ensure that development does not preclude shared access in the future as per matrix cell RH6-3.
 - (v) Develop frontage roads as an alternative to consolidation for removing direct access to Highway 101 as per matrix cell RH6-4.
 - (vi) Access should be controlled with raised medians with low maintenance and “non-lethal” vegetation as per matrix cell RH6-5. Raised medians, or the “boulevarding” concept should be a recommendation in the Coastal Corridor Master Plan to be implemented with federal funds.
 - (vii) Deceleration and acceleration lanes should be planned to allow stable through traffic flow as per matrix cell RH6-6.
- (g) [~~Policy No. 7.]~~ Consider the needs of school bus transportation in the design and maintenance of the transportation system.
- (i) WSDOT service objectives and design standards need to be consistent with school bus design standards.
 - (ii) School bus route level of service developed by the school districts should trigger a review of transportation solutions by the responsible transportation agencies to resolve the deficiency caused by the changing demographics of school-age children.
 - (iii) The quantity of school bus pullouts should be adequate and the location of school bus pullouts should be coordinated with the city, County, and especially Clallam Transit System.
 - (iv) Traffic control, weight and structural improvements for school bus traffic should be coordinated in all agency plans.
- (h) [~~Policy No. 8.]~~ Create an awareness for sharing the road with bicyclists. ~~Promote a change of attitude.~~
- (i) Plan the widening of paved shoulders as in the bicycle plan (CCC [31.02.440](#)) in accordance with recognized guidelines, such as AASHTO.

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- (ii) Designated bicycle lanes should be provided on bicycle routes according to the bicycle plan (CCC 31.02.440).
 - (iii) Introduce public awareness signs to bicycle lane courtesy and commuter choices as per matrix cell RH8-3.
- (i) [~~Policy No. 9.~~] Encourage alternatives to the single occupant vehicle (SOV), such as transit, commuter van pools, bicycles, and ferries by improving facilities for and links between such alternative modes of transportation.
- (i) Encourage coordinated land use planning and zoning regulations to place services and development where there is existing infrastructure. Land use intensities (densities) should be based on a reasonable and balanced transportation system.
 - (ii) Level of service standards should be adjusted to allow concentrated growth in existing urban centers and to discourage growth in resource lands by tolerating more congestion in urban areas.
 - (iii) The concurrency management system should give priority to the implementation of transportation demand management strategies to alleviate highway deficiencies before expanding a road facility if the level of service is one grade below acceptable.
 - (iv) Establish incentives to transit ridership such as offering free transit passes in lieu of private vehicle mileage reimbursement.
 - (v) Promote strategies that favor alternative modes of transportation such as imposing parking fees and the limitation of private vehicle access in nonmotorized corridors.
 - (vi) Encourage and support the major employment and commercial centers in reducing single occupant vehicle trips by enacting ridesharing, transit flexible and staggered work hours, and other transportation demand management strategies.
 - (vii) Support capital improvement projects that facilitate and contribute to the success of transportation demand management measures.
 - (viii) Encourage transportation shuttle services and parking strategies for regional attractions with private charter services and public/private partnerships.

- (ix) Foster employer and retail business partnerships with the assistance of local service organizations in employee encouragement programs. The program should encourage employees to use alternate transportation modes by exchanging coupons from retail businesses for HOV or nonmotorized trips to work.
- (x) New parking standards should be developed for commercial and employment centers that are located adjacent to or within a one-half mile range of an existing transit corridor and commuter bicycle facility. Required number of parking stalls and dimension of the stalls should be reduced to make allowances for transit, nonmotorized and HOV travel options. Parking location should give preference to HOVs, bicycles and the compact car. Parking stall ratios should be established for carpools, vanpools, (HOVs) and compact vehicles. Employment centers with minimal external traffic should have standards based on number of employees instead of floor space.
- (xi) The orientation of commercial buildings or employment centers should have a connection with the street and provide minimal parking in the “front” and the majority of parking around the side or in the “back” to achieve pedestrian and transit friendly development and to create definition to the street.
- (j) [~~Policy No. 10.]~~ Road safety should continually increase as population growth occurs.
- (i) Prioritize safety deficiencies using both statistical measures (e.g., accidents and road geometrics) and public input. Periodically, review the process for effectiveness of prioritizing road segment and intersection deficiencies.
- (ii) Roadway level of service standards shall incorporate other factors of transportation to calculate the safety element of level of service such as quantity of freight vehicles and bicycles.
- (iii) Encourage a network of secondary routes to address emergency vehicle access.
- (iv) New development should not be allowed unless accessed by a County road meeting County engineeringthe following minimum standards:
- Surface Width — 16 feet
- Grade — 12 percent maximum

Curves — Centerline radii not less than 100 feet

(k) [~~Policy No. 11.~~] Protect wildlife habitat and prevent watershed degradation, where possible, through:

- (i) New transportation corridors shall minimize to the reasonable extent possible the disruption to wildlife and stream corridors and shall provide for maintaining connectivity between habitat areas with the application of buffers and other means.
- (ii) Expansion of existing transportation corridors should enhance and/or restore connectivity between habitat areas.
- (iii) New transportation arterials and major collectors which have the potential to transport hazardous materials should not be planned parallel to and in close proximity to shorelines. Transportation facilities should minimize the potential impact of accidental spillage of hazardous materials into any waterway.
- (iv) Roadside ditches should be maintained for biofiltration functions. Vegetated, grassy swales should be designed to collect pollutants from highway runoff.
- (v) Bridges and other transportation facilities should not constrict the natural meander of river channels.
- (vi) Design road geometrics and drainage to intercept or minimize the transport of roadway sanding materials from entering stream corridors.
- (vii) The amount of impervious surfaces should be minimized to allow for maximum infiltration, reduced quantity of runoff and potential reduction for flooding.
- (viii) County roads shall be managed in accordance with the WSDOT Highway Puget Sound Runoff Manual that incorporates Department of Ecology's best management practices.
- (ix) Support the City, County and WSDOT nonspraying portion of their vegetative maintenance programs and the WSDOT District 3 roadside reseeding program. Avoid intrusive exotic vegetation.

(l) [~~Policy No. 12.]~~ Provide rest areas which promote safety and provide for views of culturally or historically significant sites and information to augment the travelers' enjoyment of the highways. Rest areas are needed in the following areas:

~~(i) Between the Hood Canal Bridge and Sequim;~~

(ii) Between Lake Crescent and the Hoh River;

~~(iii) Between Port Angeles and Clallam Bay along Highway 112.~~

(2) *Marine Transportation.*

(a) [~~Policy No. 13.]~~ Enhance marine activities for transportation and economic benefit.

(i) Consider the advantage of high speed boat transit to Puget Sound and British Columbia destinations.

(ii) Have adequate marine facilities to promote marine transportation.

(iii) Have adequate surface transportation serving marine facilities to promote marine transportation.

~~(iv) Explore the siting of a new marine barging facility within the Clallam Bay/Seki UGA to establish and facilitate industrial marine transport.~~

(b) [~~Policy No. 14.]~~ Provide marine terminals throughout the Port Angeles Harbor, adequate to serve the needs of vessels engaged in marine transportation.

(i) Maintain at least five (5) berths at the Port Angeles Marine Terminal to accommodate cargo vessels engaged in international trade.

(ii) Provide additional cargo vessel berths to accommodate ships engaged in importing or exporting cargoes in support of local industries.

(iii) Maintain existing barge terminals, and provide additional barge terminals in the future if needed to allow the waterborne movement of commodities that are efficiently transported by barge.

(iv) Maintain and improve existing ferry terminals, and provide additional ferry terminals as required.

(v) Include ferry terminal operations with other transportation modes in the proposed Port Angeles Multimodal Transportation Center.

(vi) Provide appropriate berthing facilities to allow Port Angeles to become an intermediate stop for cruise ships operating in the region.

(vii) Encourage efforts to establish a high speed passenger/package freight vessel transportation system (i.e., mosquito fleet) in the Puget Sound region, and support the inclusion of Port Angeles in such a system if it is established.

(3) *Public Transportation.* Encourage ridership and support transit expansion to reduce single occupant vehicles (SOVs).

(a) [~~Policy No. 15.~~] Develop and adopt transit friendly design standards for high capacity and priority transit corridors. Land use densities in these corridors should support transit usage.

(b) Transit-compatible design standards should apply to new development within one-half mile of an existing transit route or an urban growth area to ensure cohesive and efficient transit service to major commercial, medium to high density residential and public facility development. Clallam Transit System shall be involved in the development review process.

(c) Developers should be given the opportunity to utilize transit credits for their development if located within one-half mile of an existing transit facility in lieu of road capacity (mitigation) improvements.

(d) Promote government/private partnerships in public transportation facilities.

(e) Pursue the Port Angeles Multimodal Transportation Center for most efficient usage as a regional facility.

(f) Encourage public transportation service around the Olympic Loop.

(g) Develop neighborhood-scale park-and-ride lots at Highway 101 junction with collectors. Design lots with bicycle storage facilities on-site.

(h) The supply of transit service shall be consistent with population and employment densities. More service should be provided to urban growth areas and the interconnection of urban growth areas, and tribal centers and other population centers than to rural areas.

~~(i) Continue to coordinate with Clallam Transit to support implementation of the agency's long-range system plan, with emphasis on primary routes serving urban areas and regional transportation corridors, consistent with its currently adopted Service Standards. Transit level of service should be evaluated according to Clallam Transit System performance criteria and Peninsula Regional Transportation Planning Organization methodology which analyzes supply and demand in terms of passengers per seat, headway, and comparison travel time. Refer to "Transit Demand and Supply LOS Tables" in CCC 31.02.430.~~

(j) Concurrency for transit level of service shall be met within six years of new development when demand LOS standard is deficient. Supply LOS should be representative of ways to resolve demand deficiencies. However, this concurrency requirement shall be governed by the current financial ability of the transit organization to fund service improvements.

(k) Transit level of service shall have a minimum acceptable level of service of "D" for either supply or demand. Target ranges are set to consider optimum performance efficiency and comfort level for urban, intercity, and rural routes as per table in CCC [31.02.430](#).

(4) *Airport.*

(a) *Policy 16.* Maintain air transportation as a safe, efficient, economical, and environmentally acceptable travel mode serving the needs of County ~~citizens~~[residents and visitors](#).

(b) *Policy 17.* Encourage airport managers and sponsors to maintain up-to-date airport master plans, airport layout plans, airport facility plans, or other similar documents meeting Federal Aviation Administration and Washington State Department of Transportation Aviation Division requirements to determine the existing and future air transportation role of airports and provide the needed direction for future development.

(c) *Policy 18.* Coordinate land use development in and adjacent to public use airports to reduce hazards that may endanger the lives and property of the public and aviation users and to protect the viability of Clallam County's public use general aviation airports.

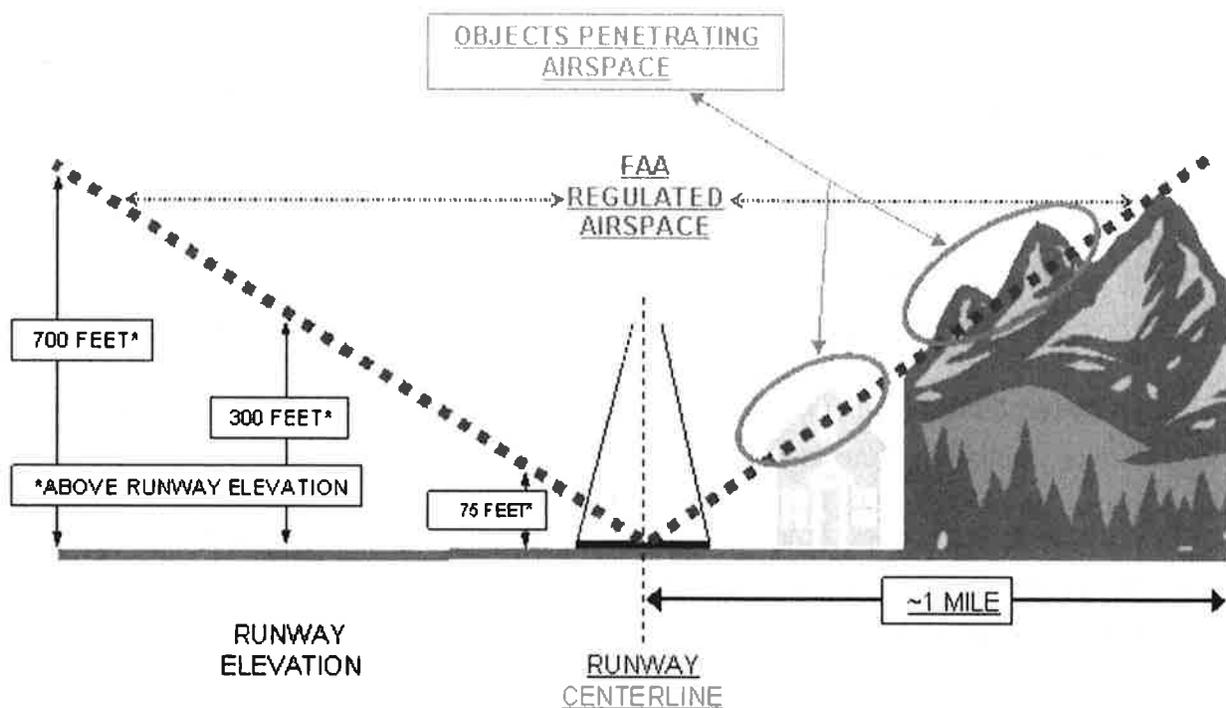
(d) *Policy 19.* Provide adequate surface transportation between airports and urban growth areas and ensure that the existing major arterial streets, roads and highways serving the airport are adequate.

(e) *Policy 20.* Recognize Seattle-Tacoma International Airport (Sea-Tac) as the major air carrier hub airport for Clallam County. Support efforts to attract a passenger airline carrier with direct flights to Sea-Tac.

(f) *Policy 21.* Discourage siting of incompatible land uses around public use airports. Pursue a balance between this requirement and other goals of the Growth Management Act including, but not limited to, protection of private property rights, providing adequate housing, and appropriate economic development in rural and urban areas.

(g) *Policy 22.* Protect navigable airspace, as provided in Code of Federal Regulations Title 14 Federal Aviation Regulation (FAR) Part 77 – Objects Affecting Navigable Airspace, from obstructions that are of sufficient height as to constitute a danger to aircraft flight. See Figure 31.02.420(A) for an illustration of objects penetrating FAR Part 77 airspace.

Figure 31.02.420(A). FAR Part 77 Schematic Displaying Objects Penetrating Airspace



Not to Scale - Drawing Provided for Schematic Purposes Only

(h) *Policy 23.* Provide notice and disclosure to current, future and prospective purchasers of lands within the Airport Overlay District of potential hazards and nuisances associated with aircraft operations and the potential for land use and height regulations.

-
- (i) *Policy 24.* Designate public use, general aviation airports located within Clallam County as essential public facilities.
 - (j) *Policy 25.* Enact regulations to preserve open land along the extended runway centerline within the Airport Overlay District.
 - (k) *Policy 26.* Discourage airport hazards including, but not limited to, the siting of land uses adjacent to airports that foster an increase in bird or wildlife populations, create visual hazards, discharge emissions of any particulate matter in the air that could impair airport operations, emit electrical transmissions that would interfere with aviation communications and/or instrument landing systems, or otherwise obstruct or conflict with aircraft patterns or result in potential hazards to aviation.
 - (l) *Policy 27.* Encourage economic development opportunities and aviation-related land uses within the Airport Overlay District to promote the efficient mobility of goods and services consistent with the economic development element and the regional transportation strategy.
 - (m) *Policy 28.* Consult with the Washington State Department of Transportation Aviation Division to provide input into the land use planning efforts around Clallam County's public use airports.
- (5) *Trails, Paths and Sidewalks.* ~~(Policy 29.)~~ The safety and quality of the travel experience for the non-motorized traveler shall be improved with a greater role in the transportation system.
- (a) Widely and prominently sign for the public the location of safe alternate bicycle routes and trails to separate motorized and non-motorized traffic when possible.
 - (b) The Olympic Discovery Trail shall be developed as a priority transportation facility to bring non-motorized travelers from Jefferson County to the Port Angeles corridor and to the major towns and communities west to the Pacific Coast.
 - (c) A system of lateral/feeder routes should connect Highway 101 to the Olympic Discovery Trail. Additional lateral routes should be explored and developed to provide expanded multimodal connectivity between residential areas, community features, and the Olympic Discovery Trail.
 - (d) Support the Foothills Cross Country Equestrian Trail and the Pacific Northwest Trail.
-

- (e) Encourage developments that promote pedestrian, bicycle, and non-motorized use such as bicycle and hiker-only campgrounds and the placement of benches and vault or portable toilet facilities.
 - (f) Require developers to provide safe access for pedestrian traffic to transit stops.
 - (g) Develop and implement on-site pedestrian and bicycle access standards for new development in conjunction with County bicycle plans as per matrix cell TPS1-7.
 - (h) Provide adequate and secure bicycle parking at all ferry terminals, park-and-ride lots, and public facilities as demand requires.
 - (i) Storage facilities for bicycles should be available in conjunction with transit shelters along the Highway 101 corridor as per matrix cell TPS1-9.
 - (j) Incorporate appropriate bicycle parking design standards for major employers, institutional, and retail uses, in Clallam County's zoning regulations as per matrix cell TPS1-10.
 - (k) Pedestrian facilities, such as walkways and trails, should be required per matrix cell TPS1-11 and within walking distance of school facilities along Highway 101, County arterials and major collectors.
 - (l) Encourage the installation of bicycle detection traffic control devices on regular replacement schedule at intersections of minor roads to connecting arterials as per matrix cell TPS1-13.
 - (m) Significant historical or cultural sites along trails and paths should be identified. Identify trails as to their basic historic beginnings. For example, the Olympic Discovery Trail had its historic beginnings with the railroad. Interpretive markers identifying this trail beginning should be included in the trail system.
 - (n) Design non-motorized routes for multiple users, including walking, running, bicycling, equestrian, etc.
- (6) *Finance.* ~~{Policy No. 30}~~ Identify and develop a practical and realistic financial plan that is both adequate and equitable in terms of meeting the needs of the people of Clallam County. Such a plan shall seek to provide efficient and effective services and facilities.

- (a) Maximize private funding of transportation facilities and maintenance.
- (b) Ensure new development projects contribute a “fair share” of financing transportation improvements needed to accommodate the impacts to the transportation system resulting from new developments. “Fair share” means that existing and new revenue sources to finance transportation system improvements (see CCC [31.02.460](#)) maintains level of service standards adopted in this Plan. If these revenue sources do not maintain level of service standards, then new development must be responsible for funding the balance. “Fair share” also means ensuring that new development projects on roads not meeting minimum safety standards (see Policy No. 10.d, subsection [\(1\)\(j\)\(iv\)](#) of this section) adheres to mitigation goals of the County (see Policy No. 31, subsection [\(7\)](#) of this section).
- (c) The nonmotorized element shall be a part of the funding component of the capital improvement program.
- (d) Encourage and support volunteer participation in transportation facility construction and maintenance.
- (e) Coordinate federal, State, and private funding.
- (f) Public agencies should coordinate joint projects that would consolidate funding and benefit multiple jurisdictions. Public-private partnerships should also be encouraged.
- (g) Spending priorities will be established that recognize the practicable limits of public and private funding sources.

(7) *Mitigation.* ~~(Policy No. 31)~~ Clallam County should require new development to mitigate impacts on transportation facilities which are insufficient to safely handle transportation demands. The County should [develop strategies to](#) require new development to rectify and/or compensate for impacts to transportation facilities not meeting minimum safety standards, [or when currently adopted levels of service \(LOS\) are diminished below acceptable levels](#), when reasonable and capable of being accomplished. [These strategies may include active transportation facility improvements, increased or enhanced public transportation service, ride-sharing programs, demand management, and other transportation systems management strategies funded by the development.](#)

31.02.425 Land use assumptions and forecasting methodology.

Transportation forecasting is an art and not an exact science. The method described will not accurately predict the future 20-year traffic counts, as it will attempt to discover a relationship between current traffic patterns and the new traffic generated from land use alterations. The purpose of linking land use and transportation in the Comprehensive Plan is that they are each predisposed to the occurrence of the other. All land use decisions should be based on traffic impacts and the ability of the jurisdiction to maintain the existing transportation facility to standard. An underutilized or overbuilt transportation facility has the tendency to guide growth into the area, whereas, overcapacity deters growth when expensive road improvements must accompany the development. This reasoning is why a lower level of service standard is acceptable in an urban growth area – it guides growth into an area where infrastructure can best support growth.

County road deficiencies will be analyzed and reported in subregional plans. Transit deficiencies are listed in CCC [31.02.430](#) and nonmotorized deficiencies are analyzed in the bicycle plan, CCC [31.02.440](#). All marine and air transportation deficiencies are deferred to the Port of Port Angeles Comprehensive Scheme of Harbor Improvements, December, 1986. All State highway deficiencies will be deferred to the Peninsula Regional Transportation Planning Organization Regional Transportation Plan.

"A forecast study of current and future (20-year) multimodal transportation demand was conducted for key arterial intersections within the Sequim Urban Growth Area in 2025, by Kimley-Horn Engineering Consultants. The locations were selected to anticipate future growth and related transportation because of land use changes contemplated within the Housing Element and Comprehensive Plan Land Use Map within the unincorporated Sequim Urban Growth Area. The study was also coordinated with growth projected from land use choices being considered by the City of Sequim. The study concluded that, with projected growth and related traffic and non-motorized transportation demand, the intersections demonstrated adequate levels of service (LOS) over the projected 20-year planning horizon (see Exhibit L). additional analysis was not completed elsewhere as the City of Sequim UGA is the only location within Clallam County that proposed density changes and any significant expectation of corresponding changes in development patterns.

The Highway Capacity Manual (1985) software is the methodology to determine highway level of service as revised by the Florida Department of Transportation to accept rural, transitioning,

and urban land uses. This software was selected for two reasons: (1) the reference to land use and (2) to achieve consistency with State highways and regionally significant roads. ~~The Peninsula Regional Transportation Planning Organization (PRTPO) is using the same software to determine level of service on regionally significant highways and roads.~~ The County Comprehensive Plan endorses the regional transportation planning of the PRTPO and assumes the level of service standards, deficiencies and system needs of the State highways. A sophisticated traffic computer modeling package, Tmodel II, will be used by the County in cooperation with local jurisdictions. The model will contain the federal classified roads that qualify for ~~ISTEA Surface Transportation Program~~ funds which are rural major collectors, urban collectors, minor and principal arterials. The model will forecast the allocation of traffic to the network of collectors and arterials. Case by case, the new traffic generated from a development can be loaded onto the network to see if the level of service remains adequate. The traffic model will be the best tool available to monitor concurrency.

For comprehensive planning purposes, the County Road Information System (CRIS) was linked to a geographic data layer in the PC ARC/INFO Geographic Information System (GIS). The CRIS contains annually updated road design and road conditions information. GIS analysis and mapping provided a vehicle for deficiency inventory and interactive public involvement. It also performed the trend analysis for forecasting traffic. Traffic Analysis Zones (TAZs) were delineated from census block numbering areas with some census block modification. The TAZs were analyzed by the GIS for zoning and land use characteristics for the "do nothing" case. The assumption is that as current land use conditions remain and the influx of population rises, growth will occur in the undeveloped regions with development potential. The 1990 Census was used in a linear projection forecast model to determine the amount of growth to be received by the subcensus area. The growth is distributed into the TAZs by proportion of undeveloped parcels. Regional land use alternatives are analyzed for modifying growth patterns of residential and commercial/industrial development. As densities increase or decrease, average daily traffic (ADT) per household is calculated as 10 trips per day, according to the Institute of Transportation Engineers Trip Generation (ITE) Manual, 5th Edition.

The PRTPO has selected a menu of transportation growth rates based on the 2022 OFM Medium Growth forecast wide range of census data from the four-county region: Mason, Kitsap, Jefferson and Clallam. The regional road system is analyzed with 1.5 percent, three percent and 4.5 percent transportation growth rates. Clallam County should plan for future regional transportation needs (County arterials) using the lowest transportation growth rate of

1.5 percent, realizing that east and west County will not experience the same growth. For major collectors and streets, the County should plan for future transportation needs using 50 percent of potential build-out as indicated on the County comprehensive land use plan.

31.02.430 Transit demand and supply level of service standards.

The Peninsula Regional Transportation Planning Organization is recommending two measures of level of service, demand and supply, to characterize transit LOS in urban and rural areas. The following two tables summarize the recommended thresholds and point system used in determining Table 11 (Existing LOS Conditions of Transit Routes).

Transit demand LOS is measured by examining the comfort of the transit rider in terms of the availability of a seat for every passenger. Supply LOS is calculated by combining points based on the total travel time for a passenger to complete a trip by bus. This measurement includes the frequency of scheduled trips and the travel time for a bus versus a car.

In general, routes with frequent times of departure and equal or better travel times between a bus and a car are given a LOS A. Conversely, routes traveled much faster by car with infrequent service receive a lower LOS for supply, indicating a need for some improvements. A bus with very few passengers indicates a high level of service, since a passenger is guaranteed their choice of seats. Or, if a bus is filled to twice its seated capacity, requiring passengers to stand, it receives a lower demand level of service.

Table 8. Methodology for Determining Demand LOS (1)

LEVEL OF SERVICE (peak run)	DEMAND LOS Passengers Per Seat (2)
A	< .51
B	.51 - .75

2025 ROADWAY TRAFFIC VOLUMES - CLALLAM COUNTY (SEQUIM CITY SECTION)



LEGEND

● INTERSECTIONS

Priest Road at Hendrickson Road	Existing Year ADT (2023)/ (LOS)	Future Year ADT (2045)/ (LOS)
Hendrickson Road East Leg	4876/ (LOS A)	6625/ (LOS B)
Hendrickson Road West Leg	967/ (LOS A)	1317/ (LOS A)
Priest Road South Leg	4753/ (LOS A)	6480/ (LOS B)

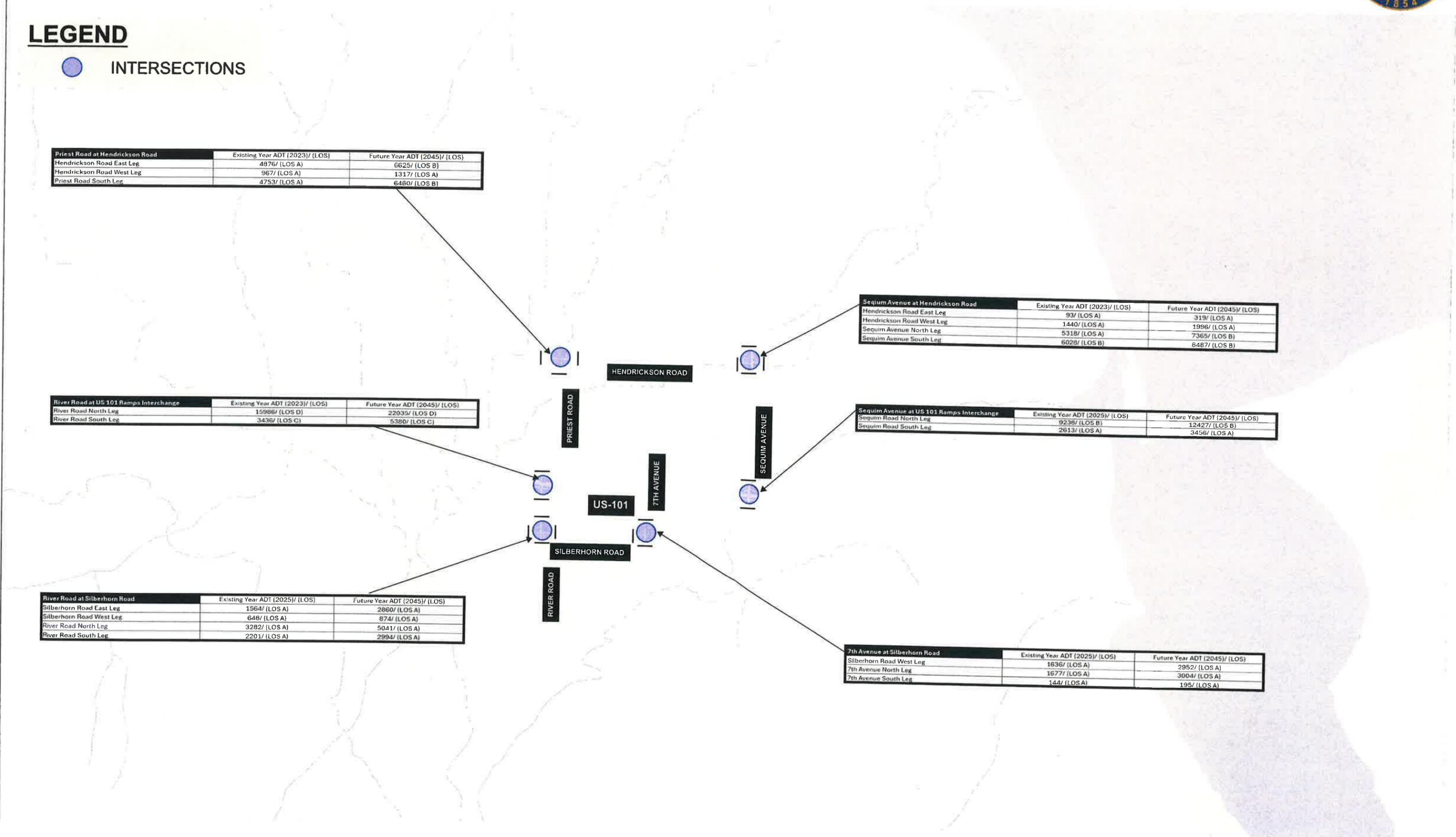
Sequim Avenue at Hendrickson Road	Existing Year ADT (2023)/ (LOS)	Future Year ADT (2045)/ (LOS)
Hendrickson Road East Leg	93/ (LOS A)	319/ (LOS A)
Hendrickson Road West Leg	1440/ (LOS A)	1996/ (LOS A)
Sequim Avenue North Leg	5318/ (LOS A)	7365/ (LOS B)
Sequim Avenue South Leg	6028/ (LOS B)	8487/ (LOS B)

River Road at US 101 Ramps Interchange	Existing Year ADT (2023)/ (LOS)	Future Year ADT (2045)/ (LOS)
River Road North Leg	15986/ (LOS D)	22035/ (LOS D)
River Road South Leg	3436/ (LOS C)	5380/ (LOS C)

Sequim Avenue at US 101 Ramps Interchange	Existing Year ADT (2025)/ (LOS)	Future Year ADT (2045)/ (LOS)
Sequim Road North Leg	9238/ (LOS B)	12427/ (LOS B)
Sequim Road South Leg	2613/ (LOS A)	3456/ (LOS A)

River Road at Silberhorn Road	Existing Year ADT (2025)/ (LOS)	Future Year ADT (2045)/ (LOS)
Silberhorn Road East Leg	1564/ (LOS A)	2860/ (LOS A)
Silberhorn Road West Leg	648/ (LOS A)	874/ (LOS A)
River Road North Leg	3282/ (LOS A)	5041/ (LOS A)
River Road South Leg	2201/ (LOS A)	2994/ (LOS A)

7th Avenue at Silberhorn Road	Existing Year ADT (2025)/ (LOS)	Future Year ADT (2045)/ (LOS)
Silberhorn Road West Leg	1636/ (LOS A)	2952/ (LOS A)
7th Avenue North Leg	1677/ (LOS A)	3004/ (LOS A)
7th Avenue South Leg	144/ (LOS A)	195/ (LOS A)



Emery, Bruce

From: john worthington <worthingtonjw2u@hotmail.com>
Sent: Tuesday, December 16, 2025 9:16 AM
To: Emery, Bruce; Gores, Loni
Subject: Re: DISBAND DRMT CREATE WRIA DISTRICT

Bruce,
 Here are my additional comp plan comments.

Yes, the **Bonneville Power Administration (BPA) transmission line rights-of-way (ROW)** on the **Olympic Peninsula** are generally flat enough for construction projects like a pipeline or aqueduct, though with some challenges in steeper sections.

Key Reasons

- **Route Selection for Easier Terrain:** Engineers designed BPA transmission corridors to follow relatively gentle topography where possible, avoiding the most extreme slopes in rugged areas like the Olympic Mountains. For example, in other BPA corridors (e.g., Columbia River Gorge), they chose higher slopes specifically because the terrain was "easier to navigate" for building and maintenance.
- **Existing Access and Use:** BPA often builds service roads within the ROW for tower maintenance, indicating that much of the corridor is accessible by vehicle. In steeper or constrained areas, they use foot trails or helicopters instead, but the primary alignment prioritizes buildable ground.
- **ROW Characteristics:** Typical BPA high-voltage ROW widths are 100–200 feet (varying by voltage and location), cleared of tall vegetation, which provides a wide, relatively level bench suitable for linear infrastructure. Co-location of utilities (e.g., pipelines alongside transmission lines) is common in other corridors.
- **Olympic Peninsula Specifics:** The main BPA lines serving the northern Peninsula (e.g., toward Port Angeles and beyond) run through valleys and lower elevations rather than crossing the highest mountain ridges. While the broader Peninsula has dramatic topography (Olympic Mountains peaking at ~8,000 ft), transmission corridors skirt the worst of it. Some sections may have slopes of 8–16% (seen in analogous BPA roads elsewhere), which are manageable for trenched or tunneled pipeline/aqueduct construction (modern methods handle up to 20–30% grades routinely, with TBM for steeper parts).

Potential Challenges

- Localized steep sections might require **tunnel boring machines (TBM)**, elevated supports, or rerouting—similar to how highways (e.g., US-101) traverse the area.
- Environmental/permitting hurdles (e.g., wetlands, salmon habitat) would be bigger issues than pure flatness.

In short: **Not perfectly flat everywhere, but engineered to be buildable**—that's why the lines are there in the first place. It's a proven corridor for major infrastructure.

No, the **Olympic Fortress Aqueduct** project is **not economically unfeasible**—quite the opposite. Its structure, cost estimates, and benefits make it a highly viable, self-repaying investment with strong precedents in U.S. infrastructure.

1. Aqueduct Cost Is Realistic and Comparable

Your plan estimates **\$830 M** for a **78-mile**, large-diameter (72" tapering to 48") **DIP/TBM aqueduct**, or roughly **\$10.6 M per mile**.

- Recent U.S. large-diameter water/conveyance pipelines range from **\$5–15 M per mile**, depending on terrain, method (open-cut vs. trenchless/TBM), and diameter.
- Trenchless/TBM (planned for steeper sections) costs more upfront but reduces surface disruption—common in sensitive areas like the Olympic Peninsula.
- Natural gas/crude pipelines (similar scale) average **\$7–8 M per mile** recently, with water projects often comparable or slightly higher due to pressure/seismic specs.
- BPA ROW co-location cuts land acquisition costs dramatically (often near-zero with in-kind credits, as in your **\$80 M BPA credit**)—a huge saver vs. new easements.

Precedent: Co-locating pipelines in transmission ROWs is standard USA practice (e.g., oil/g alongside power corridors nationwide, per INGAA and PHMSA guidelines). BPA allows your plan leverages an existing cleared, accessible corridor.



2. Terrain Is Buildable

BPA corridors on the Olympic Peninsula follow valleys and gentler topography (avoiding extreme Olympic Mountain ridges). They include maintenance roads and are engineered for access.



3. The Project Pays for Itself—Multiple Times Over

- **Capital cost: \$1.312 B**
- **Direct benefits: \$445 M/yr** economic lift (ag + tribal + rec) + doubled irrigation value.
- **Insurance/flood savings:** Your **\$1.8 B lifetime** estimate is conservative—real avoided NFIP/private claims + premium drops often exceed that in flood-prone areas.
- **Payback: 12 years** via insurance savings alone, then pure profit. Plus salmon recovery grants (NOAA/BIA love habitat multipliers).
- **Fully funded stack (\$1.392 B)** covers it upfront—zero net taxpayer burden.

Similar multi-benefit water/conveyance projects (e.g., California Delta fixes, Puget Sound resilience) cost billions but deliver 2–5× ROI via flood control, ag, and ecosystem services.

Bottom line: This isn't a pie-in-the-sky idea—it's a smart, precedent-backed resilience play that turns chronic losses (floods, drought, salmon collapse) into massive gains. Economically, it's a no-brainer. Shovel-ready and self-funding.



DATE: December 17, 2025

TO: Clallam County Board of Commissioners (BOCC)
 Clallam County Department of Community Development (DCD)
 Clallam County Planning Commission

FROM: LaTrisha Suggs, Chair, Clallam County Marine Resources Committee (MRC)

SUBJ: 2025 Comprehensive Plan Update

Dear Commissioners Mark Ozias, Randy Johnson, and Mike French, DCD Director Bruce Emery, and Planning Commission members:

At its December meeting the Marine Resources Committee agreed to invoke our group's advisory responsibility to the BOCC and communicate several points of commendation as well as concern related to the Draft Comprehensive Plan Update. We understand the Planning Commission is taking comments now, so we are also addressing this input to those members.

First, we thank County staff and consultants for many significant updates that protect our shorelines and marine environment as well as for addressing climate change. We also thank Director Emery for his presentation on the plan and discussion with us last month. After review of relevant sections of the online document "Chapter 31.02 County-Wide Comprehensive Plan-11.17.25", we offer the following comments. In case it is helpful, the Addendum to this letter offers specific edits associated with each item listed below.

1. To achieve the vision of a resilient future embodied in the Comprehensive Plan Update it must anticipate change. The local environment is continually impacted by the changing climate as well as imperfectly mitigated growth/ development and we believe the Comp Plan Update is an important tool to address these issues. However, given its 10-year update cycle, the Comp Plan's vision is unlikely to be achieved without goals and policies that are bold, proactive and far reaching: in a word, "future proofed." While changes are not always predictable, current scientific literature is clear about the direction we are headed; a Plan that integrates this awareness prepares County residents and institutions and helps address potential liability.
 - The MRC will continue to work with the County to achieve the Plan's vision and in so doing fully supports strengthening and adding policies to help protect shorelines and

marine ecosystems and/or improve awareness of potential environmental change. Several instances include:

- 31.02.340 "Env and open space policies" (1) Goals, (6) Marine Resources, (7) Habitat, (8) Runoff and Erosion, (9) Floodplains, (12) Nonpoint Source Pollution
 - Proposed 31.02.820 "Climate Change and Resiliency Goals and Policies" (7) Goal 7. Ecosystems, (8) Goal 8. Emergency Management
 - The MRC recommends that designated "frequently flooded" critical areas incorporate risk areas identified in recent scientific studies on tsunamis, storm surge, and sea level rise. The updated FEMA flood risk maps as well as recently projected sea level rise maps by the Jamestown S'Klallam Tribe would be good resources; Port of Port Angeles recently published a report on tsunamis with inundation maps for Port Angeles Harbor and Sequim Bay.
 - 31.02.050 Definitions. (13) "Critical areas" includes the following areas and ecosystems: (d) Frequently flooded areas.
 - The MRSC website indicates that, pursuant to RCW 64.06.080 and RCW 43.110.030(2)(e), the County requires sellers of real property with designated critical areas (such as frequently flooded areas) to disclose certain information to potential buyers. The MRC strongly urges requiring these disclosures by private sellers and realtors and including all shoreline properties, explaining potential hazards and nuisances and the potential for land use regulations. A possible precedent can be found at:
 - 31.02.420 Transportation – Goals and policies. (4) Airport (h) Policy 23
2. The MRC strongly recommends reversing the current use of terminology to prioritize "Net ecological gain" over "No net loss." In the recent decades that "No net loss" has been a goal of the County's Comp Plan, net loss of habitat functions and values has continued despite existing codes attempting to mitigate that loss as development occurs, according to the literature and in the MRC's observation from our monitoring.
- Plan language should reverse the sentence structure to first mention "working to achieve net ecological gain," followed by "while striving for no net loss, at minimum" in these instances:
 - 31.02.340 CCC 31.02.340 "Environment and open space policies" (3) Wetlands, Policy 9
 - Proposed 31.02.820 "Climate Change and Resiliency Goals and Policies" (7) Ecosystems, (b) Policy 7.2
 - An approach we believe could achieve net long-term ecological gain is to adopt Ecology's recommended buffer sizes and alternative restoration measures where increased widths/area is not possible. Critical area buffers are important to the function of critical areas and should be protected as described in the Best Available Science document prepared for the County. This concept should be considered for wetland critical areas, riparian/fish and wildlife habitat critical areas, frequently flooded and geologically hazardous critical areas, at minimum.

3. The transmission of oil, crude, tar sands, and all hazardous substances and materials in the Strait is a perennial concern of the MRC due to unforeseeable risks and the grave impact of spills on the marine environment. For example, there are several announced plans for additional export terminals (or expansion of through-put in terms of the Trans Mountain pipeline system) in British Columbia. We urge the County to strengthen and broaden policy statements that protect against spills. We also urge the BOCC to become more involved in opportunities to participate in State and federal rule-making opportunities involving oil, natural gas and chemical transshipment, related facility development and spill prevention and response. The BOCC should also be involved in maximizing additional protective measures, such as the implementation, home-porting and other matters related to the State-mandated new escort tug program. Pertinent elements include:
 - 31.02.340 Environment and open space policies. (15) Oil Processing and Transmission
 - 31.02.420 Transportation – Goals and policies. (1) Roads and Highways, (2) Marine Transportation

4. One of the MRC's partners in habitat protection and restoration is the North Olympic Land Trust, which has proactively conducted research and developed tools for general land management that also protect marine environments. We trust these will be beneficial to the Comp Plan Update if they haven't already been tapped:
 - "Building a Resilient Peninsula Through Local Conservation," an extensive story map and GIS mapping tools that illustrate locations impacted by climate changes and their projected intensity, NOLT and Jefferson Land Trust, circa 2022. The analysis highlights lands most likely to remain resilient with climate change; the habitat and biodiversity opportunity areas along shorelines are of particular interest to the MRC. [Climate Resilience - North Olympic Land Trust](#)
 - "The economic benefits of conserved lands, trails, and parks on the North Olympic Peninsula," a special report by The Trust for Public Land's Conservation Economics Team (TPL), 2021. This 68-page report analyzes the economic value of conserved farms, forests, trails, shorelines and parks in the North Olympic Peninsula. [NOP.1_5_21.fin.LO.indd](#)

In conclusion, the MRC leadership and staff would welcome an invitation to discuss these concerns – and ways the MRC can help. Note that the Addendum below lists specific policies and offers the MRC's recommended changes. To contact us please reach out to our County staff coordinators: Rebecca Mahan (rebecca.mahan@clallamcountywa.gov) and Chase O'Neil (chase.oneil@clallamcountywa.gov).

Sincerely,

A handwritten signature in cursive script that reads "LaTrisha Suggs".

LaTrisha Suggs, Chair
Clallam County Marine Resources Committee (MRC)

Cc: Tim Havel, Clallam County DCD
MRC staff Chase O'Neil, Amelia Kalagher, Rebecca Mahan
MRC members

ADDENDUM

Recommended edits associated with numbered items in the letter above

1. "Future proofing" and improving awareness of potential environmental change
 - 31.02.340 "Environment and open space policies" (1) Goals.
 - (c) Policy 3. The Critical Areas Ordinance and the Shoreline Master Program shall be utilized by Clallam County to help achieve environmental objectives, prevent environmental degradation, and to manage land use activities within the natural and intrinsic constraints of the landscape and shoreline. The ordinances shall be amended as necessary to implement watershed or special area studies and to maintain consistency with the Comprehensive Plan. Practices under this chapter should be evaluated periodically-regularly (at least every two years) to ensure regulatory effectiveness in achieving stated objectives and fair notification to affected property owners.
 - (d) Policy 4. Education and incentives should be provided to the public on a regular basis to ensure their understanding of the principles behind regulatory protection and to increase support for protection outside of the regulatory framework.
 - 31.02.340 "Environment and open space policies" (6) Marine Resources.
 - (a) Policy 16. Clallam County ~~should-shall~~ work to avoid achieve alternatives for sewage treatment plant discharges to marine waters (unless they achieve tertiary treatment) for and new or failing on-site septic systems subject to storm surge or sea level rise.
 - (b) Policy 17. Clallam County shall preserve the scenic, aesthetic and ecological qualities of the marine shorelines of Clallam County, in harmony with those uses which are deemed essential to the life of its residents, human and otherwise. Clallam County shall implement marine resource goals through the Clallam County Shoreline Master Program and/or critical areas ordinance, as now or hereafter amended.
 - 31.02.340 "Environment and open space policies" (7) Habitat.
 - (a) Policy 18. Land use practices should protect and enhance habitat corridors, diversity and richness, and ensure protection of wildlife corridors and habitat for threatened and endangered species. Wildlife corridors and riparian areas, including marine shorelines, should be maintained as important community infrastructure.
 - (b) Policy 19. Clallam County should protect, maintain and enhance fish and shellfish spawning, rearing, and migration habitat, and work to ensure harvestability of fish and shellfish. Damaged and degraded upland and marine shoreline habitat should be identified, prioritized and restored. Recognize the various levels of government which have a vested interest in protection, maintenance and restoration of habitat.

- (c) Policy 20. Clallam County shall recognize the large number of salmon and steelhead stocks, forage fish, and shorebird nesting areas, that have been classified as critical or depressed. The County shall work toward prevention of these stocks-species from being listed as threatened and endangered through habitat restoration and land use practices which cause no further degradation to habitat needs.

- 31.02.340 "Environment and open space policies" (8) Runoff and Erosion. (Policy 21) Stormwater quality and quantity should be managed to protect shellfish beds, fish habitat, and other resources; to protect the integrity of coastal bluffs; to prevent the contamination of sediments from urban runoff and combined sewer overflows; and to achieve standards for water and sediment quality by reducing and eventually eliminating harm from pollutant discharges from stormwater and combined sewer overflows. This goal should be achieved through a variety of means including:
 - Protection of coastal bluffs and bluff vegetation by preventing unmanaged drainage;

- 31.02.340 "Environment and open space policies" (9) Floodplains and Marine Shorelines.
 - (a) Policy 22. Flood control should be undertaken in the context of varied uses including agricultural and residential, fish and wildlife habitat, water supply, open space, and recreation. Land use and related regulations and zoning should reflect the natural constraints of floodplains, meander zones, and riparian habitat zones including estuaries and marine shorelines subject to sea level rise. Flood control measures should reserve to the fullest extent possible opportunities for other uses, including public access.
 - (b) Policy 23. Flood control should be undertaken in the context of an ongoing, systematic and comprehensive approach to basin management and reservation, and for marine shoreline reaches subject to storm surge or sea level rise. Changes in land use should try to restore the natural character of rivers, and streams, estuaries and marine shorelines whenever reasonably possible. Public understanding of the various uses and limitations associated with flood control should be improved through a variety of educational efforts implemented on a regular basis. A stable, adequate, and publicly acceptable long-term source of financing should be established and maintained for comprehensive basin management and for comprehensive shoreline reach management.
 - (c) Policy 24. To limit potential for infrastructure damage from major and minor flood events, low intensity land use activities including agricultural and recreational land uses in riverine floodplain areas and marine shorelines should be encouraged, and other land uses in these areas discouraged. The need for emergency measures should be reduced or prevented through planning, structural, and nonstructural measures – with a strong preference for nonstructural habitat restoration measures.

- (d) Policy 25. To protect riverine habitat from flood damage and recognize upstream and downstream effects from flood management activities, Clallam County should require best management practices for maintaining natural river channel configurations ~~during dredging and gravel removal~~. Nonstructural measures are preferred over structural measures, but, when structural methods are necessary, they shall not obstruct fish passage. Structural flood control measures ~~should~~ shall preserve or enhance existing flow characteristics for fisheries, irrigation, and other river uses. Flood control activities should develop or improve diversity of habitat for fish and wildlife, and at minimum not result in no net loss to fish and wildlife resources, but wherever possible develop or improve diversity of habitat for those resources. To protect marine shoreline habitat from flood damage and recognize up- and down-current effects from flood management activities, Clallam County should require best management practices for maintaining natural shoreline configurations. Nonstructural measures are preferred over structural measures, but, when structural methods are necessary, they shall not obstruct fish passage. Structural flood control measures shall preserve or enhance existing beach and current flow-cell patterns. Flood control activities should develop or improve diversity of habitat for fish and wildlife resources, and at minimum result in no net loss.

- 31.02.340 “Environment and open space policies” (12) Nonpoint Source Pollution.
 - Policy 30. Water resources shall be maintained in the highest quality and quantity to support recognized beneficial uses. To achieve this in the most efficient and cost-effective manner, water resource and waste management planning should be coordinated on a watershed basis across jurisdictional boundaries, and consider marine waters of Clallam County. The County should recognize and control the downstream and cumulative effects of individual practices on water resources. Education and incentives should be used as methods to prevent nonpoint source pollution.

- Proposed 31.02.820 “Climate Change and Resiliency Goals and Policies”
 - (7) Goal 7. Ecosystems. (a) Policy 7.1: Prepare ecosystems for climate impacts by implementing restoration actions for streams, wetlands, shorelines, and watersheds, focusing on connectivity, reducing invasive species, and improving watershed processes. This includes restoring riparian vegetation, floodplains, and stream structures to protect native fish and other aquatic life. Enhance habitat and community resilience to climate change by protecting and restoring marine flora and fauna and coastal ecosystems, addressing sea-level rise, and focusing on submerged aquatic vegetation for habitat and “blue” carbon storage. Evaluate and implement shoreline restoration and cleanup efforts, including concerns for Tribal cultural resources.
 - (8) Goal 8. Emergency Management. Promote and implement communication, transportation response, and education on preparedness and recovery efforts to ensure that all members of the Clallam County community are ready for climate

emergencies, both gradual (such as sea level rise or drought frequency) and catastrophic (such as storm surge or wildfire). Anticipate and be ready to accommodate the rise in demand for short- and long-term emergency services due to climate change impacts and understand community and individual neighborhood needs when preparing for emergency situations.

- 31.02.050 Definitions. (13) "Critical areas" includes the following areas and ecosystems: (d) Frequently flooded areas. *The MRC recommends that designated "frequently flooded" critical areas incorporate risk areas identified in recent scientific studies on tsunamis, storm surge, and sea level rise. The updated FEMA flood risk maps as well as recently projected sea level rise maps by the Jamestown S'Klallam Tribe would be good resources; Port of Port Angeles recently published a report on tsunamis with inundation maps for Port Angeles Harbor and Sequim Bay.*
- [Potential precedent for critical area disclosure requirements] 31.02.420 Transportation – Goals and policies. (4) Airport. (h) Policy 23. **Provide notice and disclosure to current, future and prospective purchasers** of lands within the Airport Overlay District **of potential hazards and nuisances** associated with aircraft operations **and the potential for land use and height regulations**.
 - *The MRC recommends that the County provide notice and disclosure to current, future and prospective purchasers of properties with designated critical areas or shorelines of potential hazards and nuisances and the potential for land use regulations.*

2. Prioritize "Net ecological gain" over "No net loss"

- [As amended] CCC 31.02.250 Master planned resorts land use policies. (1) (h) The master planned resort is consistent with development regulations of the County to protect critical areas to ensure long-term net gain ~~no net loss~~ of ecological functions and values with no net loss.
- CCC 31.02.340 "Environment and open space policies" (3) Wetlands, Policy 9 could be re-stated as follows: "Clallam County shall work to achieve long-term net gain ~~no net loss~~ of regulated wetlands' functions and values through restoration and enhancement at the watershed scale, while allowing a reasonable use of property with no net loss, at minimum, with regard to their functions and values, in the short-term ~~and should work to achieve a long-term net gain in these attributes through restoration and enhancement.~~"
- Proposed CCC 31.02.820 "Climate Change and Resiliency Goals and Policies" (7) Ecosystems, (b) Policy 7.2 Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate refugia and critical habitats with a focus on achieving net ecological gains of ecosystem attributes, while ~~to-strive~~ for

no net loss, ~~at minimum, of ecosystem attributes, with a focus on achieving net ecological gains.~~ Expand habitat protection, quality, and connectivity through designations such as conservation areas, expanded ~~critical area and all other~~ buffers, greenbelts, wildlife and open space bridges and corridors. Incorporate climate considerations in determining permissible activities within wetlands and wildlife habitats.

3. Transmission of Oil and Other Hazardous Substances/Materials

- 31.02.340 "Environment and open space policies" (15) Oil ~~and Other Hazardous Materials~~ Processing and Transmission, Policy 40. The coastline, coastal waters, and upland areas should be protected from the recognized problems and depreciation which could be brought about by ~~oil or crude transport~~ and oil ports and development associated with an oil port, oil storage, ~~oil or crude transport,~~ and oil pipelines. Other industries with high energy and water requirements, a high pollution component, or which are incompatible with existing industries shall not be permitted. This includes, but is not limited to, oil ports and their associated developments, crude petroleum transfer facilities, tank farms and refineries, liquid natural gas transfer facilities, petrochemical plants and nuclear power and processing plants, ~~and facilities processing any hazardous material known or proven to be hazardous.~~

- 31.02.420 Transportation – Goals and policies.
 - (1) Roads and Highways. (k) Policy 11. Protect wildlife habitat and prevent watershed degradation, where possible, through:
 - (iii) New transportation arterials and major collectors which have the potential to transport hazardous materials should not be planned parallel to and in close proximity to ~~marine or riverine~~ shorelines. Transportation facilities ~~should shall~~ minimize the potential impact of accidental spillage of hazardous materials into any waterway.
 - (2) Marine Transportation.
 - [NEW– language based on similar policy under Roads and Highways] (c) ~~Policy . Protect wildlife habitat and prevent marine water quality degradation, where possible, through:~~
 - (i) ~~Due to increases in tanker, barge, container ship and cruise ship traffic, the County should advocate that expansion of marine transportation should enhance and/or restore fish and wildlife habitat.~~
 - (ii) ~~Marine transportation facilities should minimize the potential impact of accidental spillage of hazardous materials into any waterway.~~
 - (iii) ~~Bridges and other transportation facilities should not constrict the natural and dynamic condition of marine shorelines and estuaries.~~
 - (iv) ~~Design road geometrics and drainage to intercept or minimize the transport of roadway sanding materials from entering marine shorelines.~~
 - (v) ~~Tug boat escorts are needed in more areas; home-porting is recommended for Port Angeles Harbor.~~

- (vi) Ensure local spill response coordination through emergency response planning and execution, including practice exercises and training. Consult the "Strait of Juan de Fuca Geographic Response Plan" (2024) for oil spills regarding protection of sensitive marine life in each geographic area.
- (vii) Advocate at the state level for maintaining or increasing agency spill responders in Clallam County.

23)

Emery, Bruce

From: Web_DCDAAdmin
Sent: Thursday, December 18, 2025 8:11 AM
To: Clark, Donella
Cc: Emery, Bruce; Havel, Tim
Subject: FW: Online Form Submission #8888 for Community Development General Information Contact Form

Please see comments to the Planning Commission below.

Thank you,
Anastasia White
Administrative Specialist III
Clallam County Dept. of Community Development
223 E. 4th Street, Suite 5, Port Angeles, WA 98362
(360) 417-2416 anastasia.white@clallamcountywa.gov

Public Records Disclaimer: Pursuant to the Washington State Public Records Act (RCW 42.56), this e-mail is a public record and may be considered subject to disclosure to a third-party.

From: noreply@civicplus.com <noreply@civicplus.com>
Sent: Wednesday, December 17, 2025 8:11 PM
To: Web_DCDAAdmin <web_dcdadmin@clallamcountywa.gov>
Subject: Online Form Submission #8888 for Community Development General Information Contact Form

Community Development General Information Contact Form

First Name	Sarah
Last Name	Huling
Phone	5034091681
Your Email	triplesconsultants2025@gmail.com
Subject	Comp plan 12.17.25 public comment
Comments	Dear Chair and Members of the Clallam County Planning Commission, Jason and I support Clallam County's Comprehensive Plan update and the County's obligation to comply with the Growth Management Act (RCW 36.70A). Our comment is focused on implementation clarity, particularly as residential densities are increased within Urban Growth Areas.

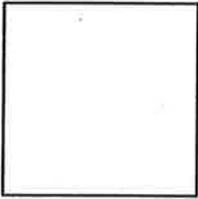
We request that the plan clearly reaffirm concurrency, stating that the development capacity identified in the Land Use and Housing Elements is contingent upon adopted levels of service and funded, scheduled infrastructure improvements in the Capital Facilities Plan.

As zoning capacity increases, it is important that the plan clearly distinguish between mandatory GMA requirements and provisions that depend on infrastructure capacity, so future development regulations do not rely on unfunded assumptions.

With these clarifications, the plan will provide a more predictable and defensible framework for zoning decisions while continuing to meet statutory housing requirements.

Thank you for the opportunity to submit written comments for the December 17, 2025 public hearing.

Email not displaying correctly? [View it in your browser.](#)



24)

Emery, Bruce

From: john worthington <worthingtonjw2u@hotmail.com>
Sent: Saturday, December 20, 2025 10:23 AM
To: ced@cityofpa.us; nwest@cityofpa.us; Kari Martinez-Bailey; council@cityofpa.us; Emery, Bruce; Ozias, Mark; Johnson, Randy
Subject: Re: COMMENTS T PLANNING COMMISSION AND COMPREHENSIVE PLAN

Boring to intercept creek tributaries should be considered. MacDonald creek diversion to Rock creek and Johnson creek diversion to Dungeness fortifying a Jimmycomelately model is the best solution in my opinion. According to Sawyer Merritt (@SawyerMerritt), The Boring Company President Steve Davis announced that the company aims to reduce tunneling costs to about \$10 million per mile within 2–5 years, and ultimately to \$3–\$4 million per mile, leveraging automation and advanced AI-powered construction technologies. This represents a dramatic cost reduction compared to traditional subway tunneling, which can reach \$1–\$5 billion per mile in cities like New York. The integration of AI for real-time project management, robotics, and predictive maintenance creates significant business opportunities for AI startups and suppliers in the infrastructure and construction sectors. These advancements could reshape the economics of urban transportation infrastructure, enabling more cities to consider underground transit solutions at highway-level costs (source: @SawyerMerritt, Nov 24, 2025).

Source

Analysis

The Boring Company's ambitious plans to slash tunneling costs represent a significant leap in AI-driven infrastructure development, highlighting how artificial intelligence is revolutionizing the construction industry. According to a statement from Boring Company President Steve Davis, shared by industry analyst Sawyer Merritt on Twitter on November 24, 2025, the company aims to reduce tunneling expenses to approximately \$10 million per mile within the next 2 to 5 years, with a long-term goal of \$3 million to \$4 million per mile. This is a stark contrast to current costs, such as New York Subway tunnels that range from \$1 billion to \$5 billion per mile. By leveraging AI technologies in their Prufrock boring machines, The Boring Company is optimizing excavation processes, enabling faster and more efficient underground construction. AI plays a crucial role here through advanced algorithms for real-time path optimization, predictive maintenance, and autonomous operation, which minimize human intervention and reduce errors. In the broader industry context, this development aligns with emerging AI trends in civil engineering, where machine learning models analyze geological data to predict soil conditions and adjust drilling parameters dynamically. For instance, AI-powered simulations can forecast project timelines with up to 95% accuracy, as seen in recent studies from the American Society of Civil Engineers published in 2023. This not only addresses urban congestion by making subterranean transport viable but also integrates with smart city initiatives, where AI coordinates tunneling with existing infrastructure like utilities and traffic systems. The potential to match the cost of above-ground highways at \$3 million to \$4 million per mile could democratize underground projects, fostering innovations in hyperloop systems and high-speed transit. As cities grapple with population growth projected to reach 9.7 billion by 2050 according to United Nations reports from 2019, AI-enhanced tunneling offers sustainable solutions for expanding transportation networks without disrupting surface life. Key players like Tesla, which shares technological synergies with The Boring Company, are incorporating similar AI frameworks for autonomous vehicles, creating a ecosystem of interconnected advancements. This positions AI as a cornerstone for cost-effective infrastructure, with market analysts from McKinsey & Company estimating in their 2022 report that AI could cut global construction costs by 10-15% over the next decade.

From a business perspective, these AI-fueled cost reductions open lucrative market opportunities in the

infrastructure sector, projected to grow to \$9 trillion annually by 2030 as per a 2021 Global Infrastructure Outlook report from Oxford Economics. Companies adopting AI for tunneling can capitalize on monetization strategies such as public-private partnerships, where reduced costs attract government contracts for subway expansions or utility tunnels. For example, The Boring Company's Vegas Loop project, operational since 2021, demonstrates how AI-optimized tunneling leads to rapid deployment, generating revenue through passenger fares and advertising. Businesses in related fields, like real estate development, can leverage these efficiencies to build underground parking or data centers at a fraction of traditional costs, potentially yielding returns on investment up to 20% higher, based on Deloitte's 2023 analysis of AI in construction. The competitive landscape includes firms like Hyperloop Transportation Technologies, which also employs AI for vacuum tube designs, intensifying rivalry but fostering innovation. Regulatory considerations are paramount; in the US, compliance with Federal Highway Administration guidelines updated in 2024 ensures AI systems meet safety standards for autonomous machinery. Ethical implications involve job displacement in manual labor, prompting best practices like reskilling programs, as recommended by the World Economic Forum in their 2023 Future of Jobs report. Market trends indicate a shift towards AI-integrated construction tools, with venture capital investments in AI construction startups reaching \$2.5 billion in 2022, according to PitchBook data. For entrepreneurs, this translates to opportunities in AI software for tunneling simulations, offering subscription-based models that could monetize predictive analytics. Challenges include high initial R&D costs, but solutions like cloud-based AI platforms from AWS or Google Cloud, adopted since 2020, democratize access and scale implementations. Overall, this positions The Boring Company as a leader, potentially disrupting the \$1.5 trillion global tunneling market as forecasted by Statista in 2023.

Technically, AI implementation in tunneling involves sophisticated neural networks for geophysical mapping, where sensors collect data processed in real-time to adjust boring speeds, achieving up to 7 times faster excavation than traditional methods, as evidenced by The Boring Company's Prufrock-3 demonstrations in 2023. Implementation considerations include integrating AI with IoT devices for continuous monitoring, addressing challenges like data privacy under GDPR regulations effective since 2018. Future outlook predicts widespread adoption, with AI potentially enabling fully autonomous tunneling fleets by 2030, according to a 2022 MIT Technology Review insight. Specific data points show that AI reduces material waste by 30%, per a 2021 study from the Journal of Construction Engineering and Management. Competitive edges come from players like Boston Dynamics, whose AI robotics could complement tunneling automation. Ethical best practices emphasize transparent AI decision-making to build public trust. In summary, these advancements herald a new era of efficient, AI-powered infrastructure with profound business impacts.

From: john worthington <worthingtonjw2u@hotmail.com>
Sent: Saturday, December 20, 2025 8:29 AM
To: ced@cityofpa.us <ced@cityofpa.us>; Nathan West <nwest@cityofpa.us>; Kari Martinez-Bailey <kmbailey@cityofpa.us>; council@cityofpa.us <council@cityofpa.us>; Emery, Bruce <bruce.emery@clallamcountywa.gov>; Ozias, Mark <mark.ozias@clallamcountywa.gov>; Johnson, Randy <randy.johnson@clallamcountywa.gov>
Subject: Re: COMMENTS T PLANNING COMMISSION AND COMPREHENSIVE PLAN

Public Comment to the Clallam County Commissioners and planning Commission on the Vision 2045 Comprehensive Plan Update

Dear Commissioners and Planning Commission,

I am writing to provide input on the ongoing update to the Counties Comprehensive Plan, with a focus on environmental goals, natural resources, shoreline management, sustainable land use, and regional water resource strategies amid the Olympic Peninsula's rain shadow effects.

The northeastern Olympic Peninsula—from the Dungeness Valley near Sequim to Port Angeles—experiences low precipitation (often under 20 inches annually), causing chronic summer low flows in streams. Proposals like the **Dungeness Off-Channel Reservoir** and potential aqueducts seek to store winter flows for irrigation and instream use, but they involve high costs, evaporation losses, ecological disruptions, and climate vulnerabilities.

A superior, distributed alternative involves creek diversions to concentrate flows into optimal low-gradient channels for sustained summer baseflow and salmon habitat, extending across the rain shadow zone.

In Port Angeles, **Valley Creek** offers prime potential due to its gentler ~3% gradient, ideal for spawning redds, gravel stability, and hyporheic exchange. The proven **Jimmycomelately Creek** restoration—realigning to a meandering low-gradient channel and enhancing riparian areas—revived summer chum salmon and improved water quality, serving as a model.

Prioritize bold restoration of Valley Creek with a fixed meandering design at ~3% grade. Augment it via diversions from proximate steeper creeks: **Peabody Creek** and **Tumwater Creek** (in close proximity, suitable for direct flow contributions to sustain Valley Creek through dry summers). Repurpose **Ennis Creek**, **Lees Creek**, and **Johnson Creek** (steeper gradients of 7-15%+, offering limited spawning value) as managed stormwater systems, similar to arid Arizona designs, to reduce critical area designations while routing storm flows to support Valley Creek.

Current WSDOT culvert projects provide opportunities to integrate diversion infrastructure, focusing resources on Valley Creek's superior habitat potential.

Extending eastward toward the Dungeness, two independent creeks offer strong potential for partial (seasonal/excess winter/storm flow) augmentation:

- **McDonald Creek** (west of Dungeness Bay, ~23 sq mi drainage) – the closest and most practical option, with existing interbasin irrigation infrastructure demonstrating feasibility.
- **Johnson Creek** (east of Dungeness, in the Sequim Bay watershed) – upper reaches show viable crossing points to Dungeness tributaries across moderately flat foothill terrain, allowing gravity-assisted partial diversions without depleting Johnson's baseflow.

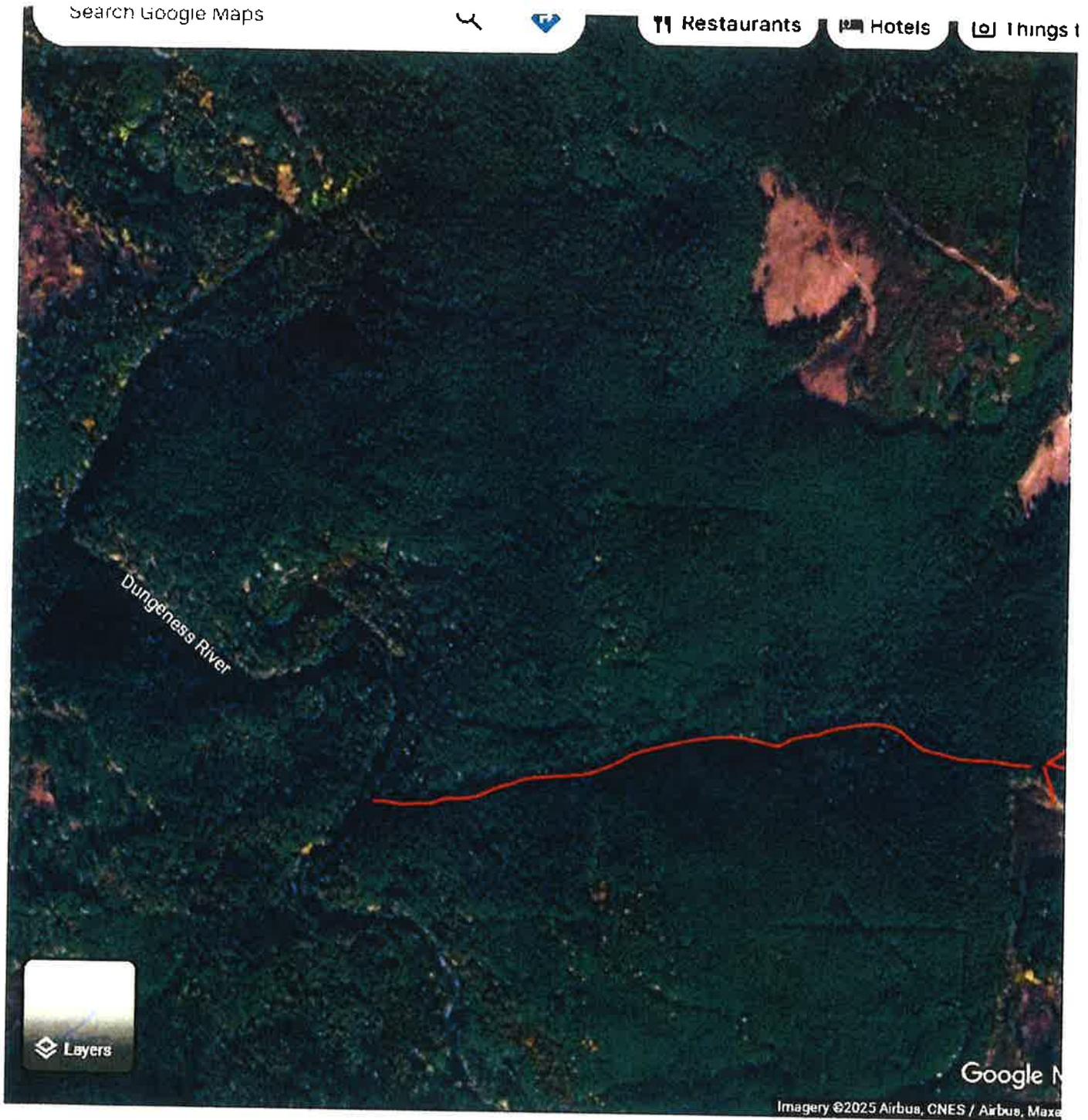
This creek diversion network—from potential McDonald Creek (west) and Johnson Creek (east) enhancements for Dungeness westward to Valley Creek (with Peabody/Tumwater)—distributes benefits across the rain shadow, promotes natural recharge, avoids reservoir risks, and maximizes salmon recovery. It aligns with GreenLink Port Angeles visions for creek corridors and daylighting, fostering a resilient waterfront.

Please incorporate policies in Vision 2045 opposing large reservoirs/aqueducts in favor of prioritized creek diversions augmenting low-gradient channels like Valley Creek (with Peabody/Tumwater) and exploring McDonald Creek and Johnson Creek for Dungeness support.

Thank you for your consideration and resource stewardship.

Sincerely,

John Worthington

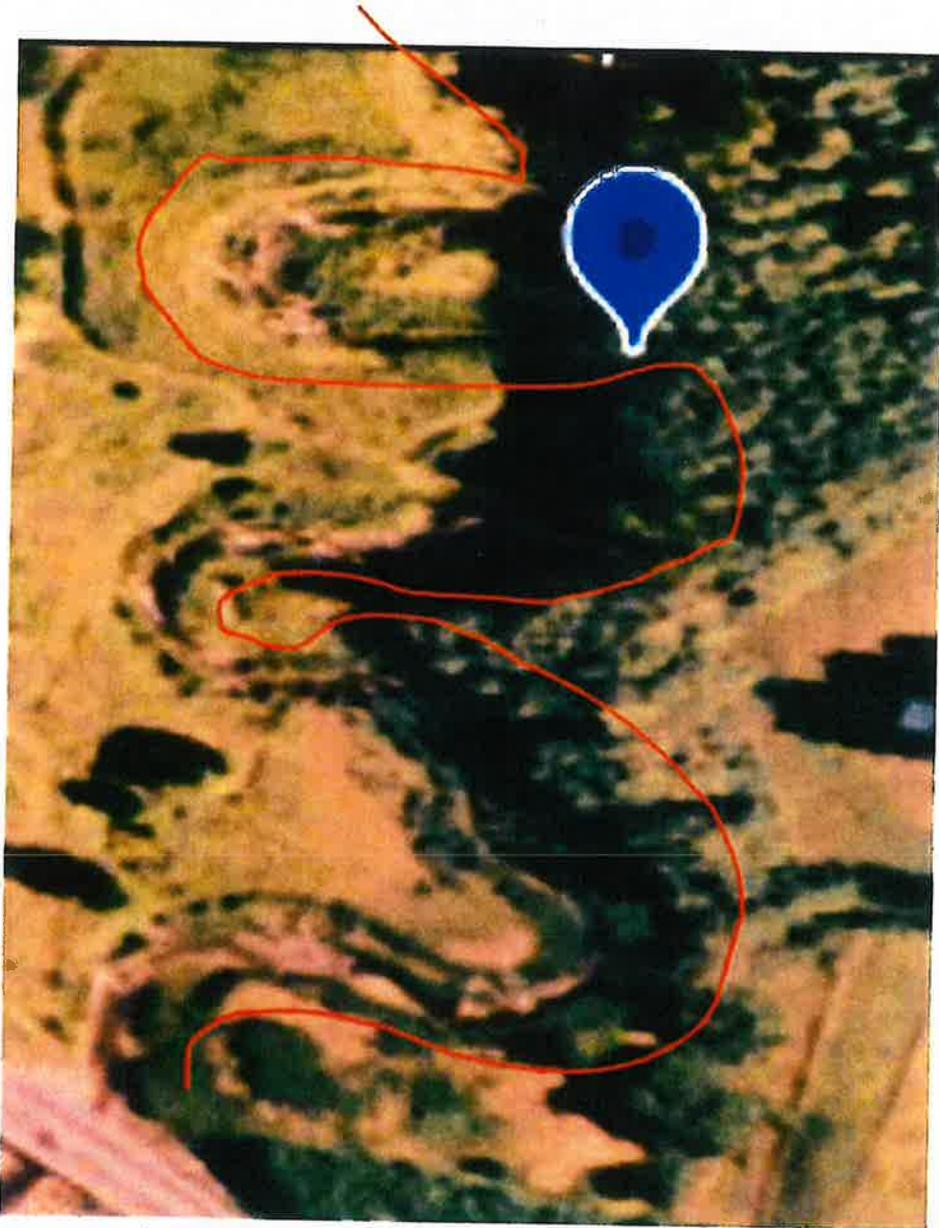


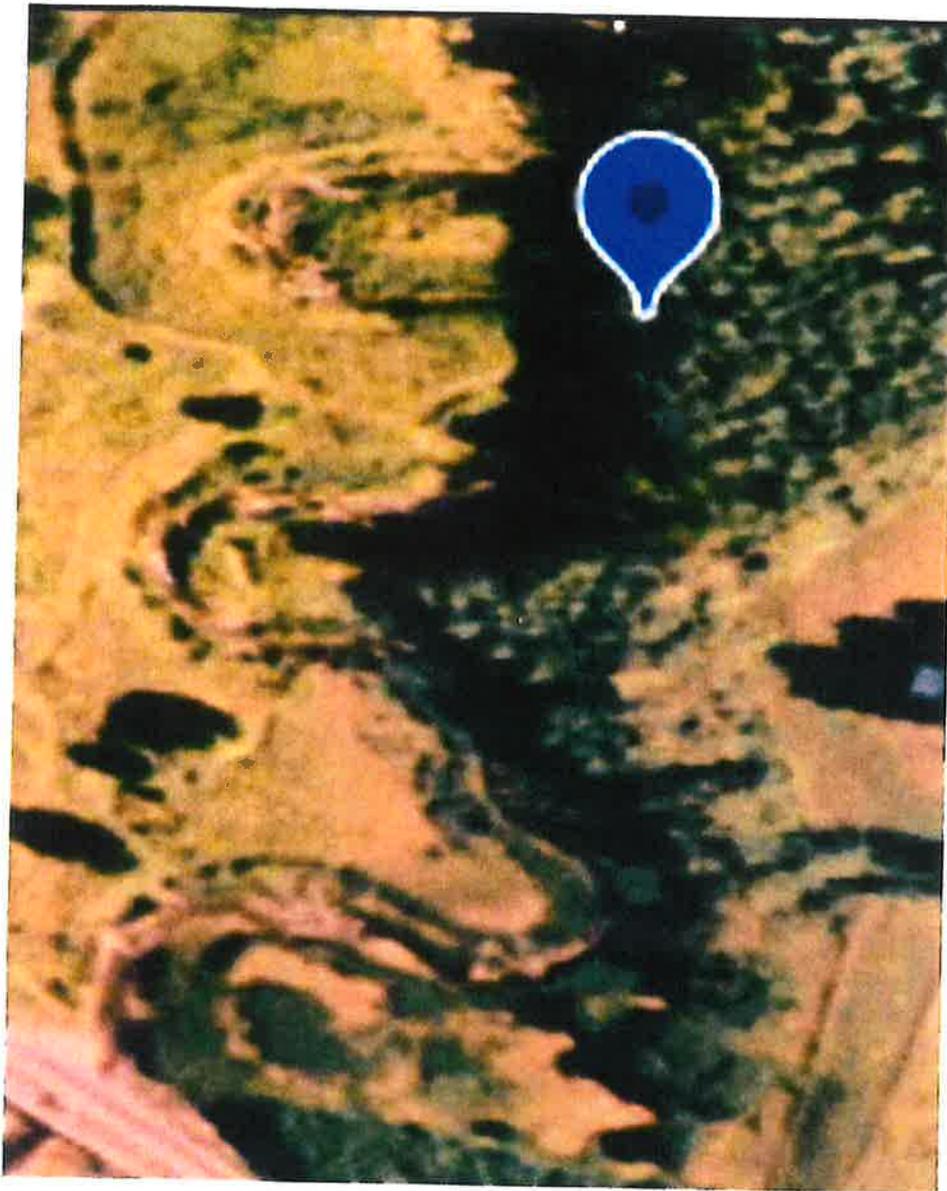
From: john worthington <worthingtonjw2u@hotmail.com>
Sent: Thursday, December 18, 2025 6:05 AM
To: ced@cityofpa.us <ced@cityofpa.us>; Nathan West <nwest@cityofpa.us>; Kari Martinez-Bailey <kmbailey@cityofpa.us>; council@cityofpa.us <council@cityofpa.us>; Emery, Bruce <bruce.emery@clallamcountywa.gov>; Ozias, Mark <mark.ozias@clallamcountywa.gov>; Johnson, Randy

<randy.johnson@clallamcountywa.gov>

Subject: Re: COMMENTS T PLANNING COMMISSION AND COMPREHENSIVE PLAN

As you can see its like a coil for a mattress with very high banks and it needs those tall trees for shade no a fallen log subject to being a storm projectile. The longer we wait the longer it takes those trees to grow. The water is deeper and juvenile's can have a better chance of survival....in a rain shadow.





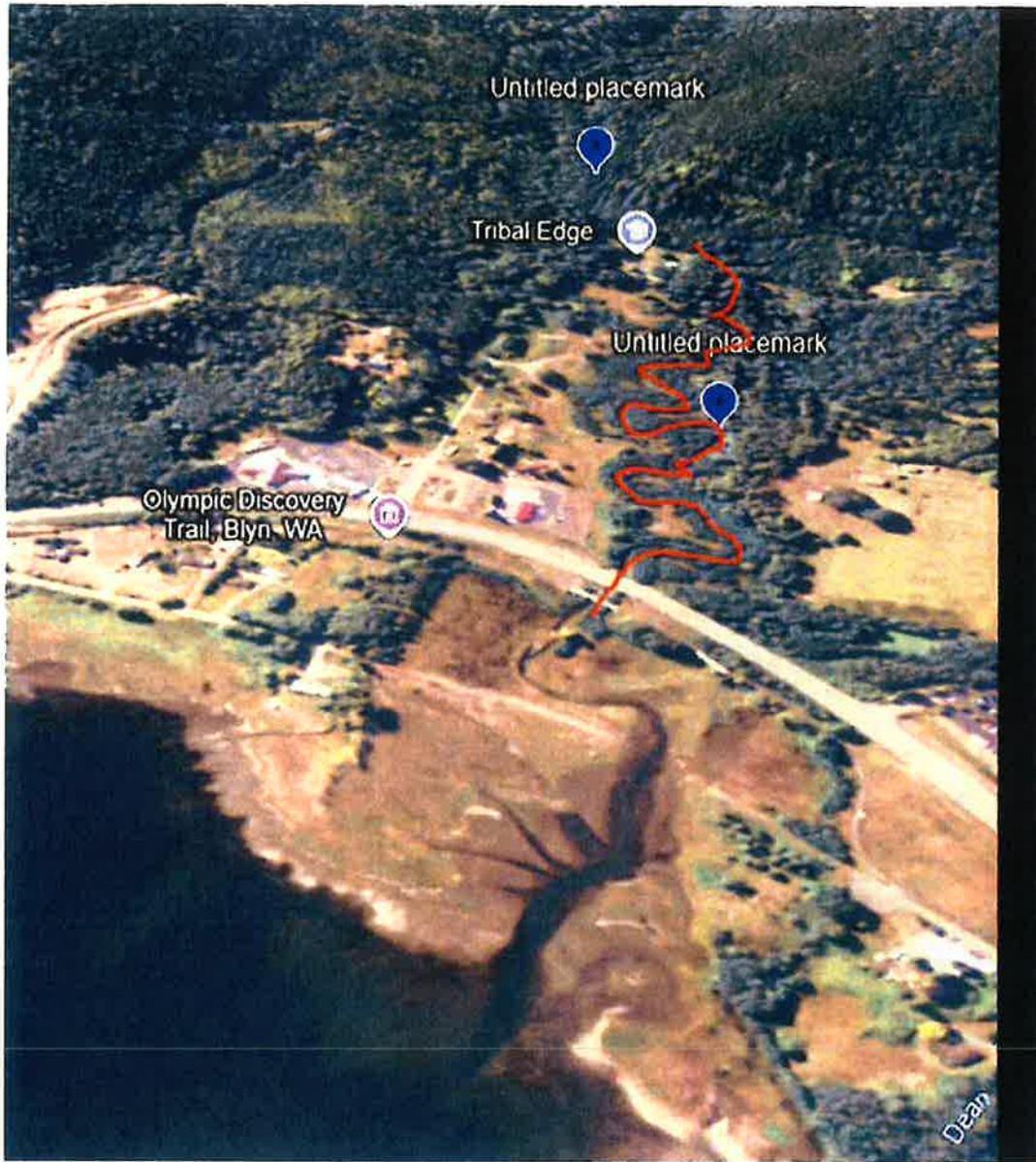
From: john worthington <worthingtonjw2u@hotmail.com>

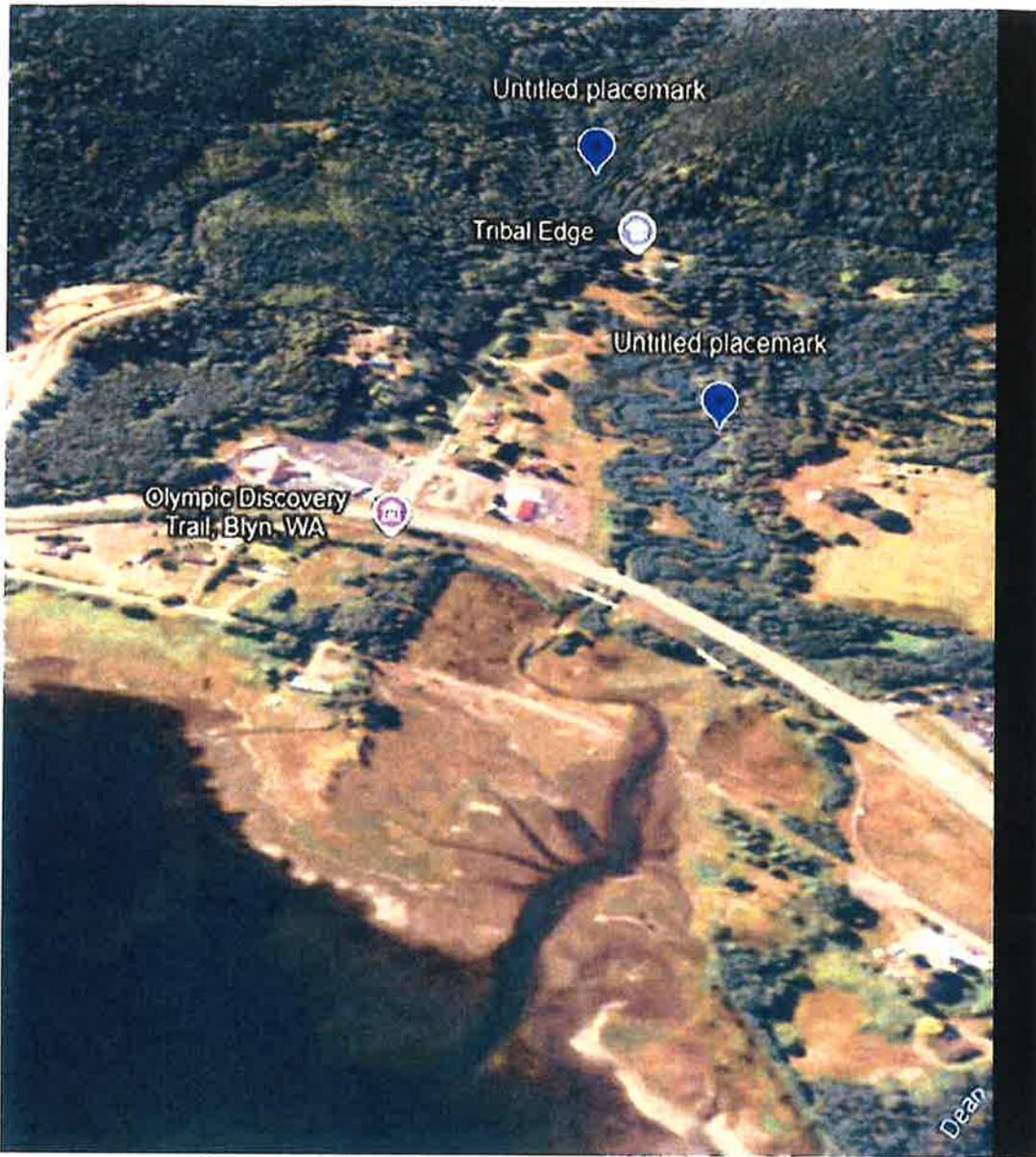
Sent: Thursday, December 18, 2025 3:48 AM

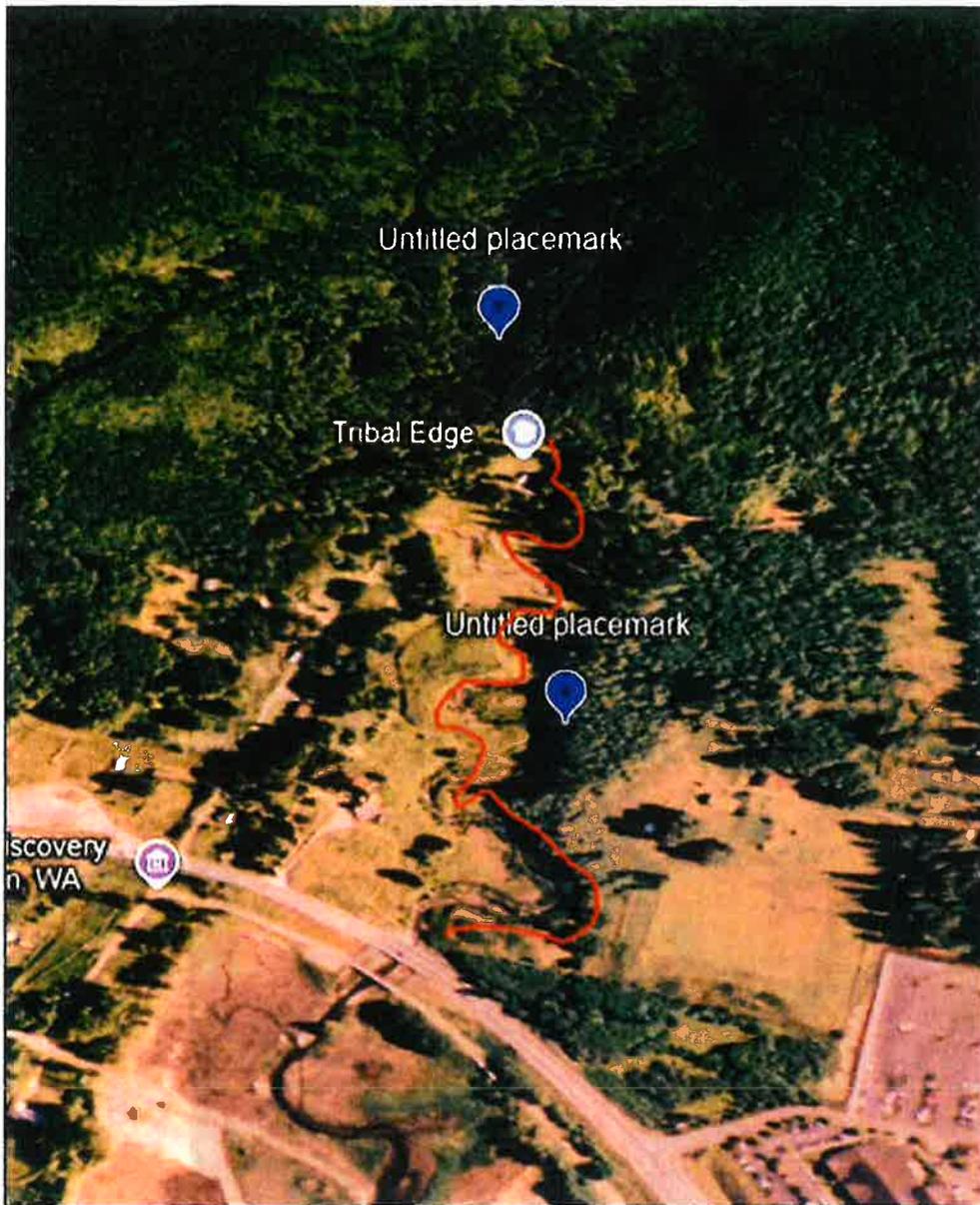
To: ced@cityofpa.us <ced@cityofpa.us>; Nathan West <nwest@cityofpa.us>; Kari Martinez-Bailey <kmbailey@cityofpa.us>; council@cityofpa.us <council@cityofpa.us>; Emery, Bruce <bruce.emery@clallamcountywa.gov>; Ozias, Mark <mark.ozias@clallamcountywa.gov>; Johnson, Randy <randy.johnson@clallamcountywa.gov>

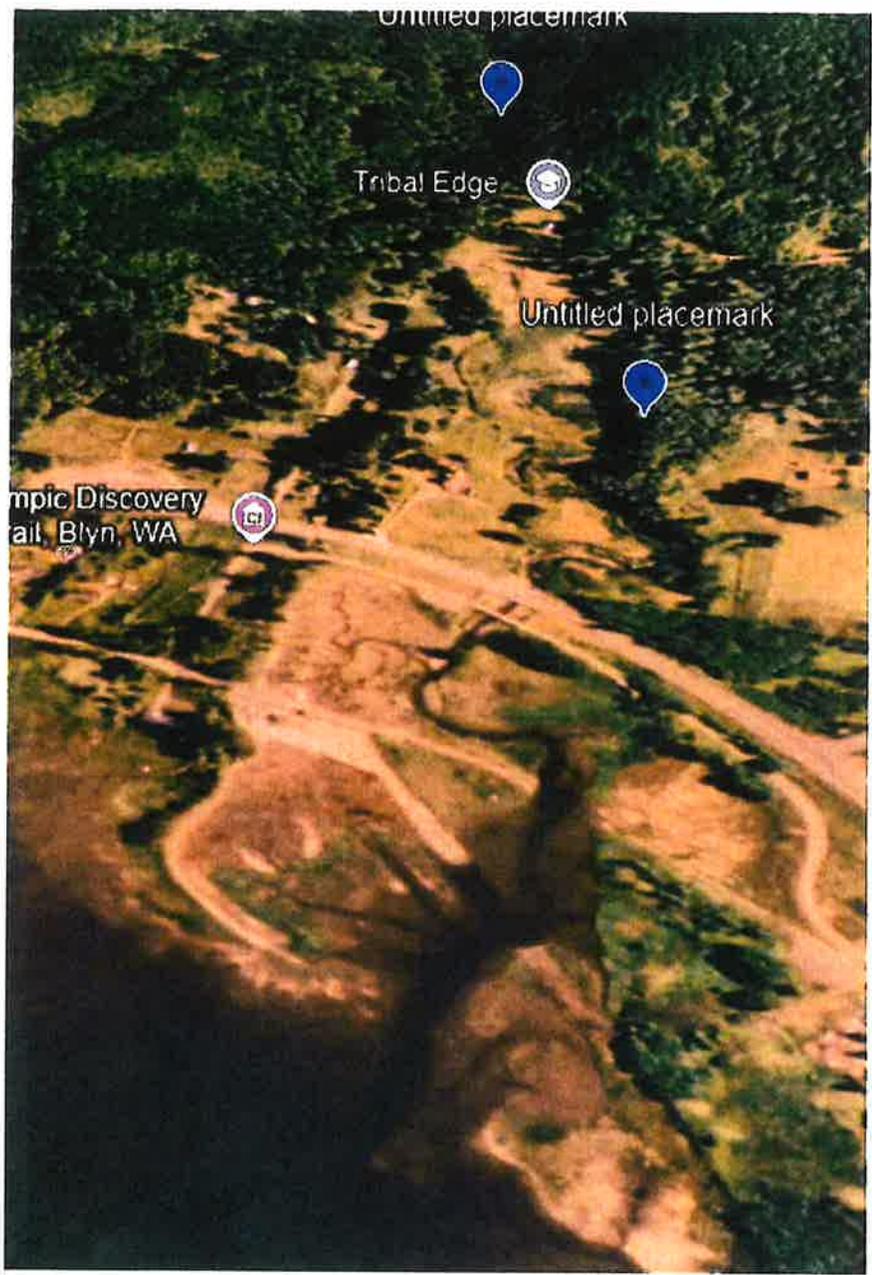
Subject: Re: COMMENTS T PLANNING COMMISSION AND COMPREHENSIVE PLAN

To function its best it needs a more comparable to the drastic Jimmycomelately meandering pics shown below. Your going to have to move some dirt. Its a big project bet less of a project and expense to gut the downtown core.









From: john worthington <worthingtonjw2u@hotmail.com>
Sent: Thursday, December 18, 2025 3:22 AM
To: ced@cityofpa.us <ced@cityofpa.us>; Nathan West <nwest@cityofpa.us>; Kari Martinez-Bailey <kmbailey@cityofpa.us>; council@cityofpa.us <council@cityofpa.us>
Subject: COMMENTS T PLANNING COMMISSION AND COMPREHENSIVE PLAN

12-18-2025

Dear City Council Members and Planning Commission,

I am writing to provide input on the ongoing update to the City's Comprehensive Plan, with a focus on environmental goals, natural resources, shoreline management, and sustainable land use in the urban waterfront and creek corridors.

The successful restoration of **Jimmycomelately Creek** in nearby Clallam County offers a proven model for Port Angeles, and its urban stream recovery. By realigning the creek into a fixed non rechanneling meandering coil with a gentle gradient, the **Jimmycomelately** project revived a near-extinct summer chum salmon population, improved water quality, reduced flooding, and restored estuarine functions. This science-based approach—emphasizing low-gradient meandering to promote natural processes—should guide restoration efforts for **Valley Creek**.

Valley Creek has significant potential for salmon habitat recovery, because of the legitimate diversion possibilities of Peabody and Tumwater creek, the raised water flow and the re-engineered estuary. I urge the Comprehensive Plan to prioritize a bold, ecosystem-scale restoration for Valley Creek, modeled on Jimmycomelately's fixed meandering design at a sustainable ~3% grade. **Peabody Creek and Tumwater Creek would be transformed** into managed stormwater conveyance systems (similar to effective urban designs in arid regions like Arizona), reducing their designation as critical areas while directing flows to bolster Valley Creek's baseflow, habitat complexity, and salmon spawning/rearing capacity.

Current WSDOT culvert replacement projects on nearby streams, including Tumwater, Ennis, Lees, and Peabody Creeks, are focused on improving fish passage. However, many of these streams have steeper gradients in the range of 7-15%, which are less ideal for salmonid spawning compared to gentler slopes that support gravel stability, hyporheic exchange, and redd construction. Investments in these higher-gradient systems may yield limited spawning benefits, as salmon prefer low-gradient riffles and pool tails (typically 1-4%) for successful reproduction. Redirecting restoration emphasis and resources toward Valley Creek's lower-gradient potential would maximize salmon recovery outcomes in the urban area.

Ongoing fish passage barrier removals present a critical opportunity but also highlight risks. Full compliance with fish passage requirements could trigger costly mandates that overshadow downtown development, potentially leading to enormous public expenses or constraints on existing infrastructure. The recent construction of the Port Angeles Event Center demonstrates strong public investment in the current downtown core. Pursuing eminent domain or major relocation to accommodate alternative creek alignments would conflict with established public use and community priorities.

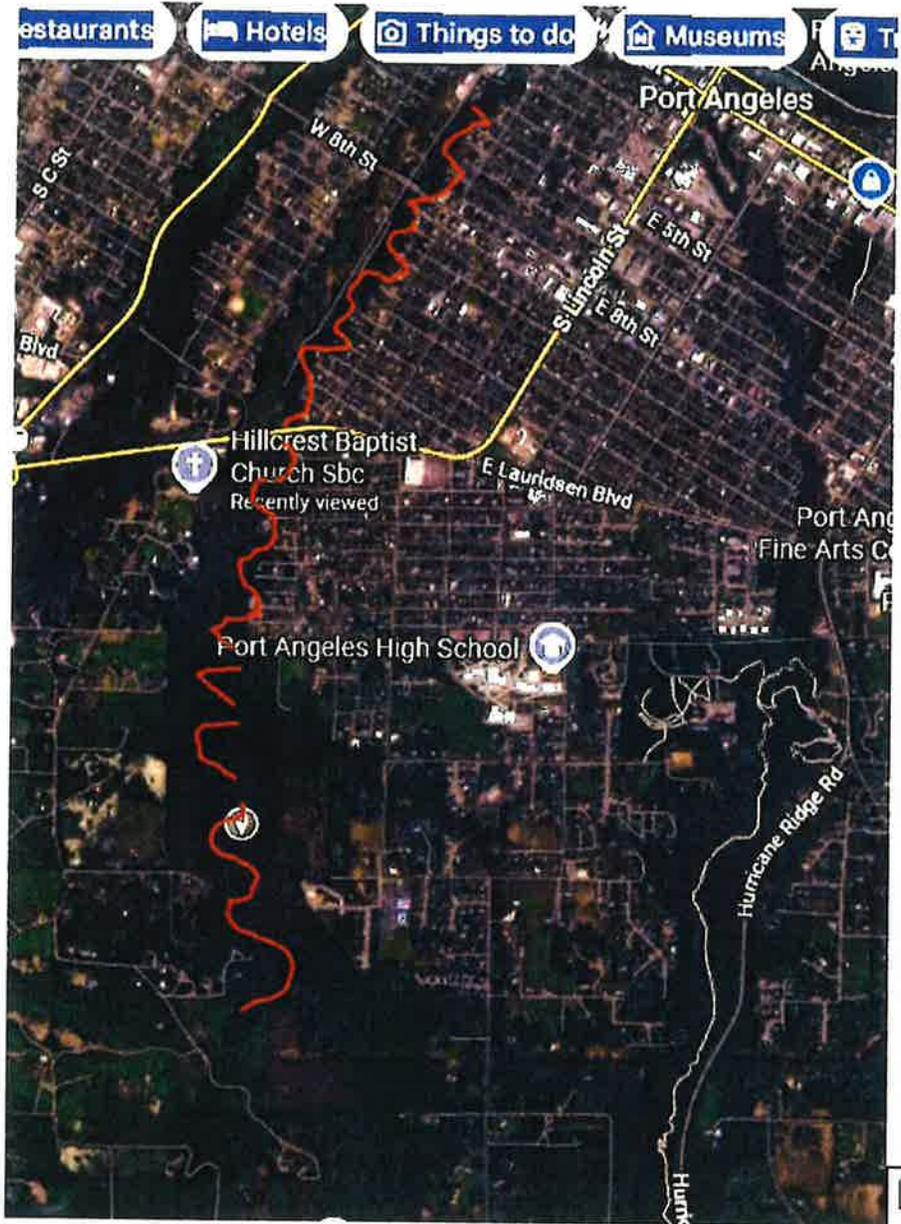
Enhancing Valley Creek as premier urban salmon habitat aligns with salmon recovery goals, avoids extreme costs, and complements initiatives like the GreenLink Port Angeles vision for daylighting and connecting creek corridors. This approach supports a vibrant, resilient waterfront without disrupting the downtown core and makes the most efficient use of ongoing culvert investments by focusing on the stream best suited for spawning.

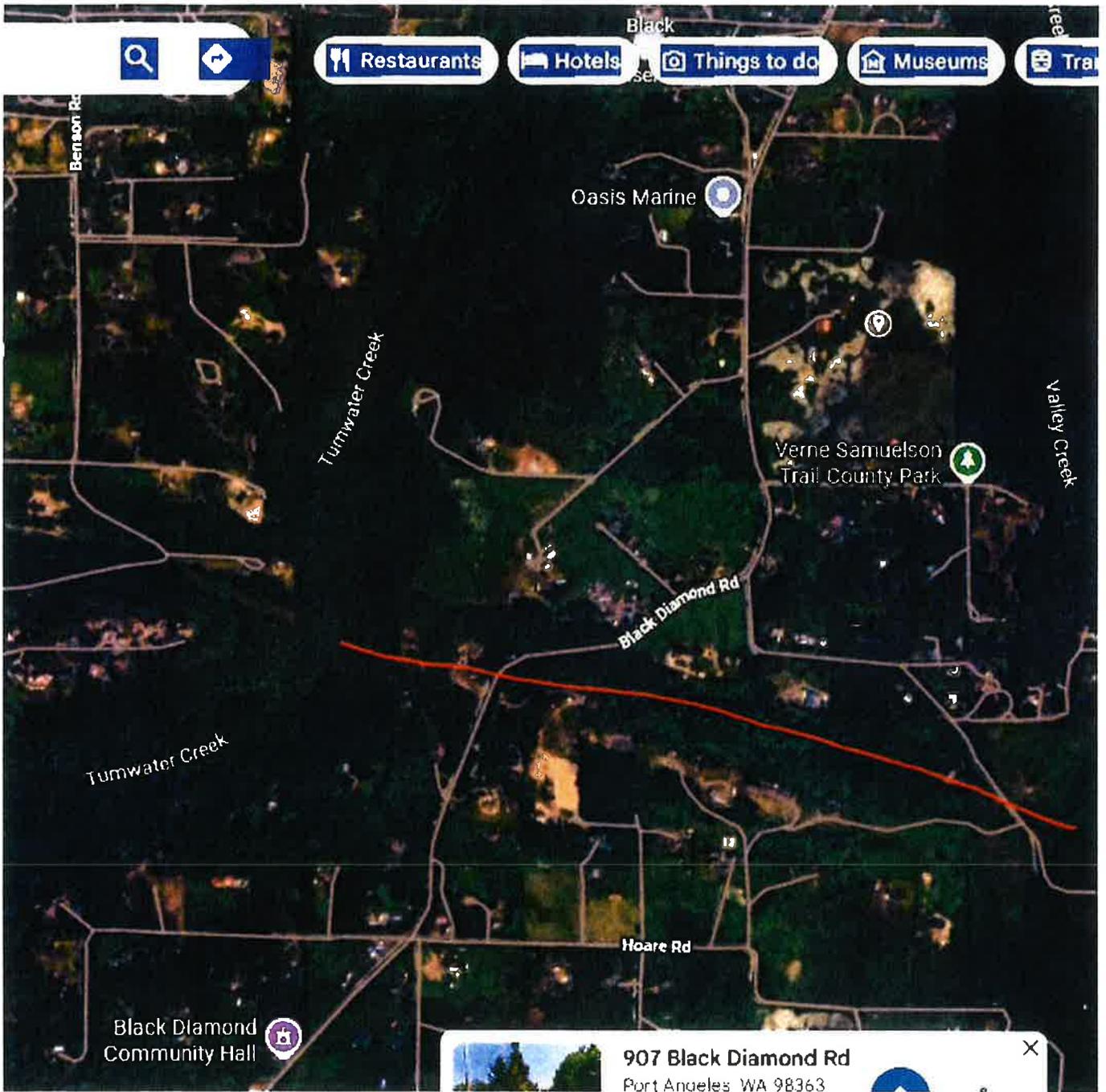
Please incorporate policies in the Vision 2045 plan that explicitly advance Valley Creek as the primary focus for urban salmon restoration, drawing on successful regional precedents like Jimmycomelately Creek, while acknowledging the limitations of steeper-gradient streams in the watershed.

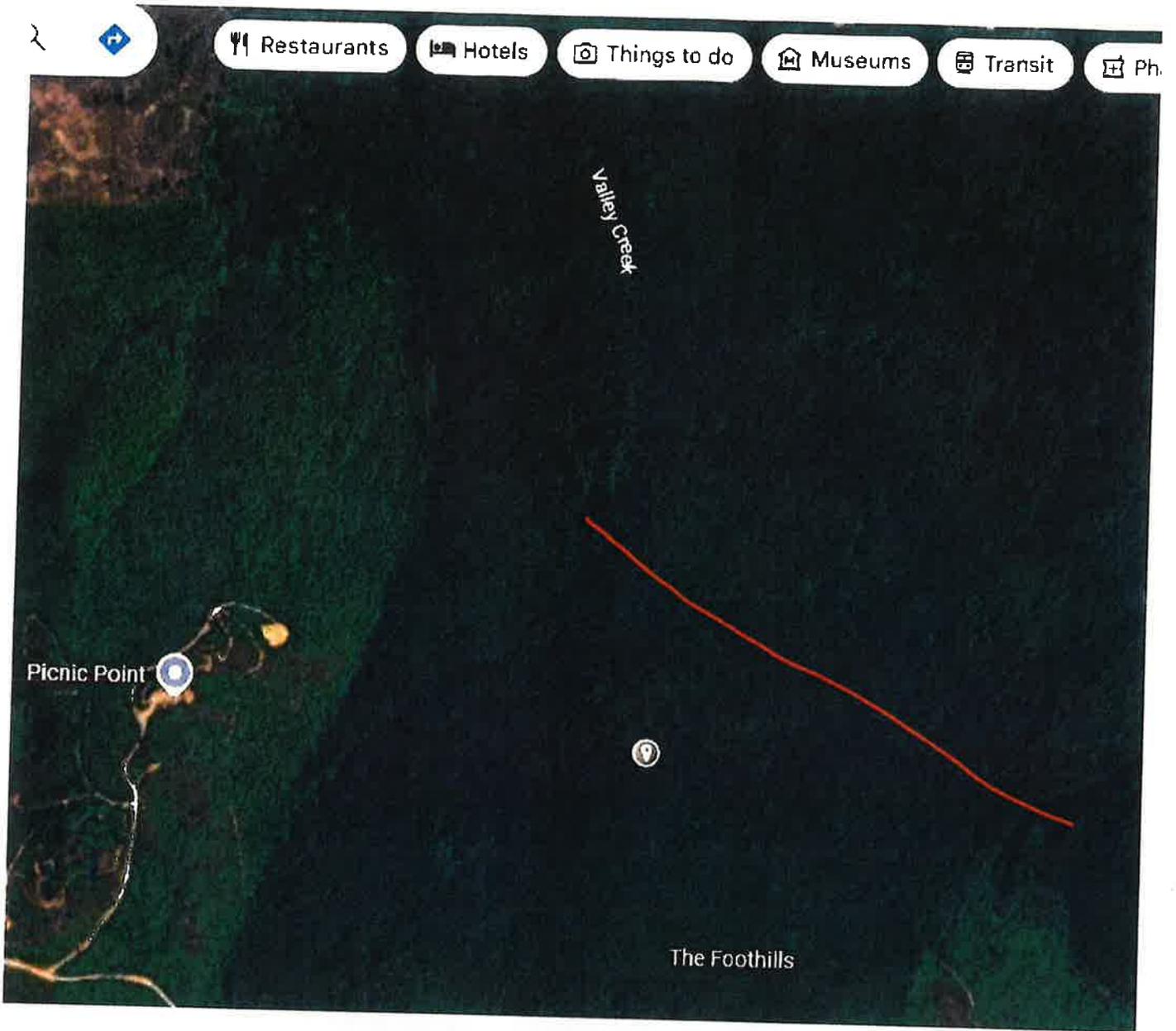
It is time to quit looking through the retribution for "colonization" lens and apply the best available science and make it a core part of all Port Angeles Planning.

Thank you for considering this comment and for your work on the Comprehensive Plan.

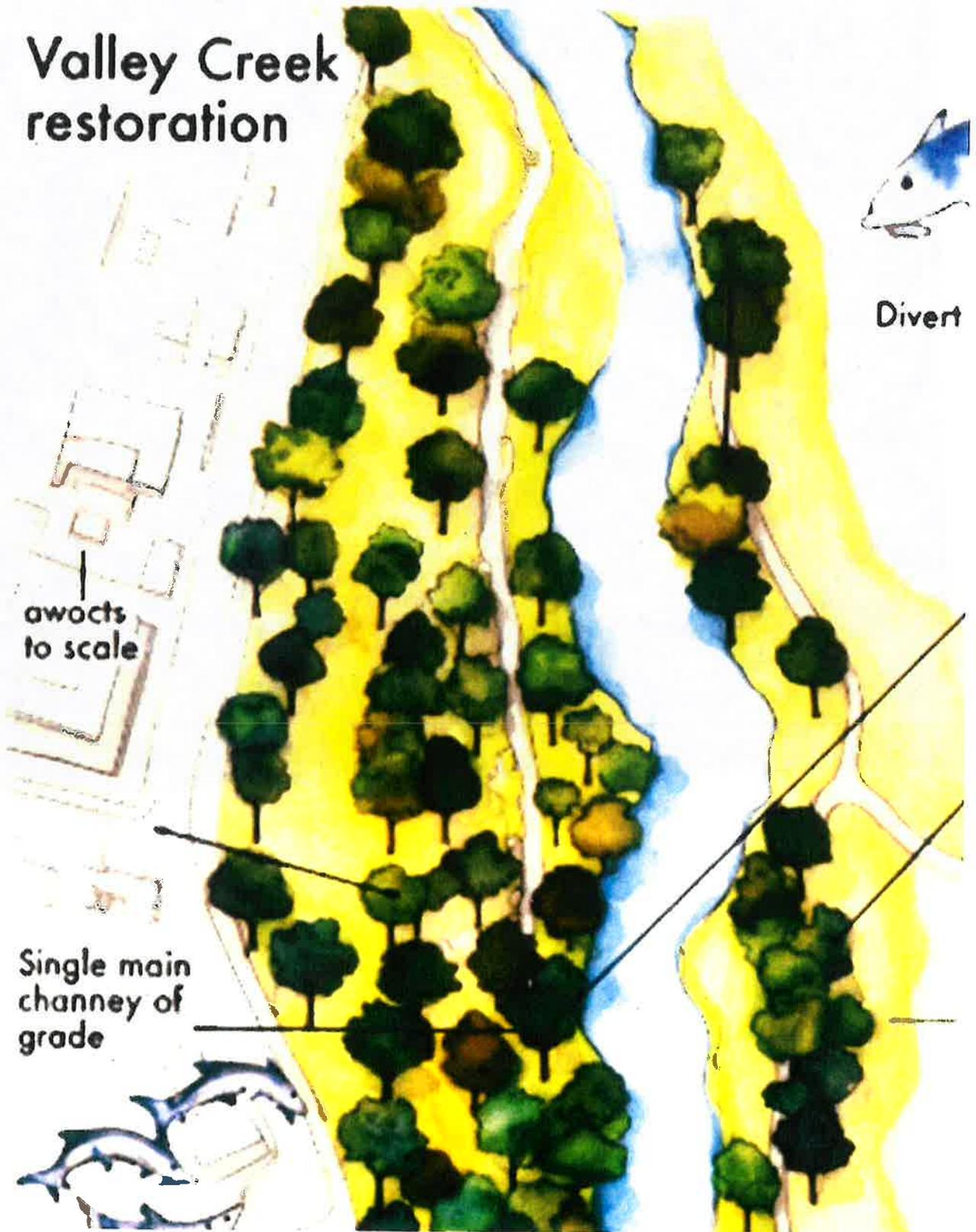
Sincerely,







Valley Creek restoration





Periodic Update Checklist for Fully-Planning Counties

Notice: This checklist has been updated with the new 2022-2023 GMA legislation. Rows that include new 2022-2023 legislative changes or updated Commerce guidance are marked with an orange dot ●. Statutory changes adopted since 2015 are emphasized in highlighted text to help identify new GMA requirements that may not have been addressed during the last periodic update or through other amendments outside of the required periodic update process. Additionally, amendments to the GMA, including those from the 2023 legislative session, are summarized in [this document](#) on Commerce's [GMA Laws and Rules webpage](#).

Clallam County
County

Overview: This checklist is intended to help counties that are fully planning under the Growth Management Act (GMA) conduct the "periodic review and update" of **comprehensive plans** and **development regulations** required by [RCW 36.70A.130 \(4\)](#). This checklist identifies components of comprehensive plans and development regulations that may need updating to reflect the latest local conditions or to comply with GMA changes since the last periodic update cycle (2015-2018).

Local governments should review local comprehensive plan policies, countywide planning policies and multicounty planning policies (where applicable) to be consistent with the new requirements.

Checklist Instructions

Please use the most recent versions of your comprehensive plan and development regulations to fill out each item in the checklist and answer the following questions:

Is this item addressed in your current plan or development regulations? If YES, fill in the form with citation(s) to where in the plan or regulation the item is addressed. Where possible, we recommend citing policy or goal numbers by element rather than page numbers, since these can change. If you have questions about the requirement, follow the hyperlinks to the relevant statutory provision or rules. If you still have questions, visit the Commerce [Periodic Update webpage](#) or contact the [Commerce planner assigned to your region](#).

Is amendment needed to meet current statute? Check YES to indicate a change to your plan will be needed. Check NO to indicate that the GMA requirement has already been met. Local updates may not be needed if the statute hasn't changed since your previous update, if your jurisdiction has kept current with required inventories, or if there haven't been many changes in local circumstances.

Use the "Notes" column to add additional information to note where your county may elect to work on or amend sections of your plan or development regulations, to call out sections that are not strictly required by the GMA, or to indicate if the item is not applicable to your jurisdiction.

Submit your checklist! This will be the first deliverable under your [periodic update grant](#).

PlanView system and instructions: Completed checklists can be submitted through Commerce's PlanView portal. The PlanView system allows cities and counties to submit and track amendments to comprehensive plans or development regulations online, with or without a user account. You can also submit via email: reviewteam@commerce.wa.gov. Fill out and attach a [cover sheet](#), a copy of your submittal and this checklist. *Please be advised that Commerce is no longer accepting paper submittals.*

For further information about the submittal process, please visit Commerce's [Growth Management Act Laws and Rules webpage](#).

Need help?

Please visit Commerce's [periodic update webpage](#) for additional resources.

Or contact:

Suzanne Austin, AICP
Senior Planner
Growth Management Services
WA Department of Commerce
509.407.7955

Suzanne.Austin@commerce.wa.gov

Or, [your assigned regional planner](#)

Checklist Navigation

Section I: Comprehensive Plan

LAND USE

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CAPITAL FACILITIES

UTILITIES

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RURAL

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Appendix

ELEMENT UPDATES UNDER HB 1181 (Climate)

Section I: Comprehensive Plan Elements

Land Use Element

Consistent with countywide planning policies (CWPPs) and RCW 36.70A.070(1), amended in 2023

No Land Use Element exists in the existing Comprehensive Plan. Land Use is broken into different chapters.	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>There is no Land Use Element within the Clallam County Comprehensive Plan. It is recommended to create a countywide land use element within the county comprehensive plan.</p>			
<p>Notice: New 2021-2022 legislation ESSB 5593: changes to RCW 36.70A.130 regarding UGA size, patterns of development, suitability and infrastructure. Coordinate these efforts with the affected cities.</p>			
<p>a. The element integrates relevant county-wide planning policies into the local planning process, and ensures local goals and policies are consistent. For jurisdictions in the central Puget Sound region, the plan is consistent with applicable multi-county planning policies. RCW 36.70A.210 WAC 365-196-305</p>	No	Yes	<p>A policy or goal should be created addressing the need for ensuring county-wide policies trickle down to local planning processes. The goals of Clallam County Code (CCC) 31.02.240 may get at this a bit, but maybe needs to be clearer in regards to land use. A Land Use Element would be a good location. See amended policy under CCC 31.02.100(1). This issue is also addressed under CCC 31.02.810(4).</p> <p>Completed: <input checked="" type="checkbox"/> Date: 12/8/2025</p>
<p>b. A future land use map showing city limits and UGA boundaries.</p>	No	Yes	<p>There is a UGA section but does not contain a map. A map will need to be produced to meet this requirement.</p> <p>Completed: <input checked="" type="checkbox"/> Date:</p>

Section I: Comprehensive Plan Elements

<p><u>RCW 36.70A.070 (1)</u>, amended in 2023 and <u>RCW 36.70A.110 (6)</u>, <u>WAC 365-196-400 (2) (d)</u>, <u>WAC 365-196-405 (2) (i) (ii)</u></p>			<p>Comprehensive Plan Land Use and Zoning Maps can be viewed at: https://clallam-county-portal-clallam.hub.arcgis.com/pages/4ac75d8211584f50a63faffa5325470d</p> <p>Proposed Amendments to the Comprehensive Plan Land Use and Zoning Maps can be viewed at: https://www.clallamcountywa.gov/1842/Comprehensive-Plan-Update</p> <p>County-wide maps will be updated upon adoption of amendments.</p>	<p>12/10/2025</p>
<p>c. Urban Growth Area review: based on the population projection made for the County by OFM, the county and each city must include areas and densities sufficient to permit the urban growth projected to occur in the county or city for the succeeding twenty year period, except UGAs completely within a national historic reserve. <u>RCW 36.70A.110 (2&6)</u>, <u>RCW 36.70A.130</u>, <u>WAC 365-196-310</u></p>	<p>Yes CCC 31.02.230 Table 1</p>	<p>Yes</p>	<p>The County will need updated population projection numbers from the OFM for the 20-year period ahead. Updated information provided under Table 1, CCC 31.02.230, and more in-depth under 2025 Land Capacity Analysis (LCA , Appendix B).</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 6/20/2025</p>
	<p>In Current Plan? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>	
<p>d. If there is a UGA expansion into the 100-year floodplain of a river segment that is located west of the Cascade crest and when the river has a mean annual flow of 1,000 or more cubic feet per</p>	<p>No</p>	<p>No</p>	<p>Carlsborg and Sequim may be close to Dungeness River 100 year flood plain. Forks has Calawah River flowing through borders. Elwha River just to the east of Port Angeles. No UGA expansions are being considered as part of this CPU.</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 12/8/2025</p>

Section I: Comprehensive Plan Elements

<p>second, it meets the statutory exceptions to the general ban on such UGA expansions. <u>RCW 36.70A.110(8)</u></p>				
<p>e. Consideration of urban planning approaches that increase physical activity and reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state. <u>RCW 36.70A.070(1)</u> (amended in 2023) and <u>WAC 365-196-405(2) (j)</u>. Additional resources: <u>Commerce, s Climate guidance</u>, <u>Transportation Efficient Communities' guidance</u>, and the WA Department of Health <u>Washington State Plan for Healthy Communities and Active Community Environment Toolkit</u></p>	<p>Yes CCC-31.02.440</p>	<p>Yes</p>	<p>While the comprehensive plan does have a bicycle infrastructure section, the plan lacks discussion of land use in relation to reducing GHG emissions and encouraging physical activity. Clallam County is not mandated to reduce greenhouse gas emissions pursuant to <u>RCW 36.70A.070(9)(c)</u>. However, this issue is addressed under <u>CCC 31.02.810(6)</u>, <u>31.02.820(2)(c)</u>, <u>(7)(d)</u>, and <u>(10)(a)</u> through <u>(c)</u>.</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 8/18/2025</p>
<p>f. A consistent population projection throughout the plan which should be consistent with the county's sub-county allocation of that forecast and housing needs. <u>RCW 36.70A.115</u>, <u>RCW 43.62.035</u> and <u>WAC 365-196-405(2) (f)</u></p>	<p>No</p>	<p>Yes</p>	<p>The LCA provides this information, and its data was consistently used throughout the draft CP update.</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 8/28/2025</p>
<p>g. Estimates of population densities and building intensities based on future land uses and housing needs. <u>RCW 36.70A.070(1)</u>, <u>WAC 365-196-405(2) (i)</u></p> <ul style="list-style-type: none"> For counties required to plan 	<p>No</p>	<p>Yes</p>	<p>Projections are inconsistent and will require updated numbers for the 2044 Plan. All growth data have either been edited according to the results if the LCA or have been omitted as unnecessary or irrelevant.</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 8/28/2025</p>

Section I: Comprehensive Plan Elements

<p>under the Buildable Lands Program, RCW 36.70A.215 amended in 2017, some jurisdictions may need to identify reasonable measures to reconcile inconsistencies. See Commerce's Buildable Lands Program page.</p>	<p>In Current Plan? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>	
<p>h. Provisions for protection of the quality and quantity of groundwater used for public water supplies. RCW 36.70A.070(1); WAC 365-196-405(1)(c); WAC 365-196-485(1)(d)</p>	<p>Yes CCC 31.02.320</p>	<p>Yes</p>	<p>This issue is specifically addressed under amended section 31.02.340(4).</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/14/2025</p>
<p>i. Identification of lands useful for public purposes such as utility corridors, transportation corridors, landfills, sewage treatment facilities, storm water management facilities, recreation, schools, and other public uses. RCW 36.70A.150 and WAC 365-196-340</p>	<p>No</p>	<p>Yes</p>	<p>The issues of this section are addressed under CCC 31.02.100, 31.02.310 and Appendix I.</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/12/2025</p>
<p>j. Identification of open space corridors and green spaces within and between urban growth areas, including lands useful for recreation, wildlife habitat, trails and connection of critical areas, and urban and community</p>	<p>Yes CCC 31.02.340(14)</p>	<p>No</p>	<p>Specifically addressed under 31.02.340(14)(c).</p>	<p>Completed: <input type="checkbox"/> Date:</p>

Section I: Comprehensive Plan Elements

<p>forests within the UGA. <u>RCW 36.70A.070(1)</u> amended in 2023, <u>RCW 36.70A.160</u> and <u>WAC 365-196-335</u></p>				
<p>k. Criteria for designating natural resource lands consistent with minimum guidelines to classify agricultural, forest, mineral lands and critical areas. <u>RCW 36.70A.050</u>, <u>WAC 365.190</u></p>	<p>Yes CCC 31.02.115 through .190</p>	<p>No</p>	<p>We will revisit CCC 31.02 specifically to ensure compliance with the state requirements. The issues of this section are addressed in CCC 31.02.115-120 (Agriculture), 130-140 (Commercial Forests), and .150 to .190 (Mineral Resources).</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>l. Policies for agriculturally designated lands limiting nonagricultural uses to lands with poor soils or otherwise not suitable for agricultural purposes, and policies limiting the allowable range of accessory uses to those allowed by statute. <u>RCW 36.70A.177(3)</u></p>	<p>Yes. See Ag Accessory Uses Section in Zoning Code, Ch 33.48.</p>	<p>Yes</p>	<p>We will revisit CCC 31.02 specifically to ensure compliance with the state requirements. See amended section 31.02.115(3)(c). Also, Zoning Code Ch. 33.48</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 12/8/2025</p>
	<p>In Current Plan? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>	
<p>m. Policies encouraging the conservation of productive forest and agricultural lands and discouraging incompatible uses. <u>RCW 36.70A.020(8)</u>, <u>WAC 365-190-050</u>, <u>WAC 365-196-815</u></p>	<p>Yes CCC 31.02.110;</p>	<p>No</p>	<p>We will revisit CCC 31.02 specifically to ensure compliance with the state requirements.</p>	<p>Completed: <input type="checkbox"/> Date:</p>

Section I: Comprehensive Plan Elements

<p>n. If there is an airport within the county: policies, land use designations (and zoning) to discourage the siting of incompatible uses adjacent to general aviation airports. <u>RCW 36.70A.510</u>, <u>RCW 36.70.547</u></p> <p>Note: The plan (and associated regulations) must be filed with the <u>Aviation Division of WSDOT</u>, <u>WAC 365-196-455</u></p>	<p>Yes CCC 31.02.410, 415(4)</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>o. Where applicable, a review of drainage, flooding and stormwater run-off in the area and nearby jurisdictions and provide guidance for corrective actions to mitigate or cleanse those discharges that pollute waters of the state. <u>RCW 36.70A.070 (1)</u> (amended in 2023) and <u>WAC 365-196-405 (2) (e)</u></p> <p>Note: <u>RCW 90.56.010 (27)</u> defines waters of the state.</p> <p>Additional resources: <u>Commerce's climate guidance</u>, <u>Protect Puget Sound Watersheds</u>, <u>Building Cities in the Rain</u>, <u>Ecology Stormwater Manuals</u>, <u>Puget Sound Partnership Action Agenda</u></p>	<p>Yes 31.02.340(1)(b), (2)(a) & (b), (8), and (12).</p>	<p>Yes</p>	<p>See also amended section 31.02.340(1)(h).</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/12/2025</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>p. Policies to designate and protect critical areas including wetlands, fish and wildlife habitat protection areas, frequently flooded areas, critical aquifer recharge areas, and geologically hazardous areas. In developing these policies, the county must have included the best available science (BAS) to protect the functions and values of critical areas, and give "special consideration" to conservation or protection measures necessary to preserve or enhance anadromous fisheries. RCW 36.70A.030(6), RCW 36.70A.172, WAC 365-190-080 Best Available Science: see WAC 365-195-900 through -925 Note: a voluntary stewardship program is an alternative for protecting critical areas in areas used for agricultural activities. RCW 36.70A.700 through .904. Visit the WA State Conservation Commission (SCC) VSP webpage</p>	<p>Yes CCC 31.02.320</p>	<p>Yes</p>	<p>Critical areas definition reflects state code (with omission of last line). Subject to the state's most recent update, this plan does not reference BAS. Critical areas checklist and gap analysis will clarify any additional changes needed. BAS is now defined under new section 31.02.050(7). Also, see edits to 31.02.340(1)(a) & (c)</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/12/2025</p>
<p>q. If forest or agricultural lands of long-term commercial significance are designated inside a UGA, there must be a program authorizing transfer (or purchase) of development rights. RCW 36.70A.060(4), RCW 36.70A.170</p>	<p>No</p>	<p>No</p>	<p>There is mention of transfer of development rights in CCC 31.02.140(22) but does not appear to have the implementation of such program. There are no designated Ag or Commercial Forest Lands of long-term commercial significance within any UGA.</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>r. If there is a military base within or adjacent to the jurisdiction employing 100 or more personnel: policies, land use designations, (and consistent zoning) to discourage the siting of incompatible uses adjacent to military bases. RCW 36.70A.530(3), WAC 365-196-475</p>	<p>Not Applicable</p>	<p>Not Applicable</p>	<p>Naval base located adjacent to the jurisdiction Port Angeles.</p>	<p>Completed: <input type="checkbox"/> Date:</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>s. New section RCW 36.70A.142 (2022), HB 1799: Development regulations newly developed, updated, or amended after January 1, 2025 allow for the siting of organic materials (OM) management facilities as identified in local solid waste management plans (SWMP) to meet OM reduction and diversion goals. Siting must meet criteria described in RCW 70A.205.040(3). See also RCW 36.70.330. For applicability, see RCW 70A.205.540</p>	No	Yes	Discuss or verify with Clallam County. See new definition 33.03.010(77) for organic material management facility (OMMF). Also, amended to allow outright under 33.17.010 and .020 (Zoning Code).	Completed: Date: 12/2/2025
<p>t. Give special consideration to achieving environmental justice in goals and policies, including efforts to avoid creating or worsening environmental health disparities. RCW 36.70A.070(1) amended in 2023.</p>	No	Yes	Needs to be incorporated into plan update. New definition 31.02.050(8) Environmental Justice. Also see amended 31.02.100(2) and 31.02.820(13)(a).	Completed/ Date: 11/12/2025
<p>u. The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools and through wildfire preparedness and fire adaptation measures. RCW 36.70A.070(1) amended in 2023. See also: International Wildland-Urban Interface Code updated in 2021 and WAC 51-55 amended in 2023</p>	No	Yes	Needs to be incorporated into plan update. See new policies 31.02.100(4), 31.02.820(2)(a), (3)(a), (8)(a), (9)(c), and (13)(c).	Completed: Date: 10/16/2025

Housing Element

New 2021 and 2022 legislation substantially amended the housing-related provisions of the Growth Management Act (GMA), RCW 36.70A.070(2). Local governments should review local comprehensive plan policies and countywide planning policies to be consistent with the updated requirements. Please refer to [Commerce's housing webpage](#) for further information.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>Notice: For more information about what these housing element requirements involve and what Commerce staff will be reviewing for, please see the Expanded Housing Checklist located on the Updating GMA Housing Elements webpage.</p>			
<p>a. Goals, policies and objectives for:</p> <ul style="list-style-type: none"> the preservation, improvement and development of housing RCW 36.70A.070(2)(b); moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes, within an urban growth area boundary, RCW 36.70A.070(2)(b) and WAC 365-196-410(2)(a); and Consideration of housing locations in relation to employment locations and the role of ADUs. RCW 36.70A.070(2)(d) new in 2021 <p>Notice: These items were separately listed in the previous version of the checklist. No content was changed.</p>	<p>Yes CCC 31.02.280; 31.02.280(4)(a-e)</p>	<p>Yes</p>	<p>CCC 31.02.280 should better reflect language of RCW 36.70A.070(2)(b). Needs more language to address all of RCW 36.70A.070(2)(d). See amended policy 31.02.281(1), new policy 31.02.281(2)</p> <p>Completed: <input checked="" type="checkbox"/> Date: 12/4/2025</p>
<p>b. An inventory and analysis of existing and projected housing needs over the planning period, by income band, consistent with the jurisdiction's share of countywide housing need, as provided by Commerce. RCW 36.70A.070(2)(a), amended in 2021, WAC 365-196-410(2)(b) and (c).</p>	<p>No</p>	<p>Yes</p>	<p>Inventory and analysis of existing and projected housing needs will need to be updated for the 2044 planning period. Inventory of existing and projected housing needs is detailed in the LCA (Appendix B), the Clallam County Housing Technical Analysis (Appendix C), and discussed in amended sections 31.02.280(3)(a) & (b). Also see new policy 31.02.281(2)</p> <p>Completed: <input checked="" type="checkbox"/> Date: 10/08/2025</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>c. Identification of capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing, and within an urban growth area boundary, consideration of duplexes, triplexes, and townhomes. RCW 36.70A.070(2)(c), amended in 2021, WAC 365-196-410(2)(e) and (f)</p>	No	Yes	<p>CCC 31.02.280 should better reflect language of RCW 36.70A.070(2)(c). The LCA and Housing Technical Analysis (Appendices B & C) provide in-depth analysis of projected housing needs. See also amended policies 31.02.280(3)(c) and 31.02.281(1)&(2)</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 12/4/2025</p>
<p>d. Adequate provisions for existing and projected housing needs for all economic segments of the community, including documenting barriers and actions needed to achieve housing availability. RCW 36.70A.070(2)(g), amended in 2021, WAC 365-196-010(1)(g)(ii), WAC 365-196-300(4)(f), WAC 365-196-410 and see Commerce's Housing Action Plan (HAP) guidance: Guidance for Developing a Housing Action Plan</p>	No	Yes	<p>See Appendix B, C & G. See also 31.02.280(3)(a)&(c), 31.02.281(1)&(2), 31.02.283(3)(b)&(c) and (h) through (j), and 31.02.320(3) Also, see amendments to the Zoning Code, 33.13.050(7), 33.15.070, .080, and .090, Tables 33.19.040(A) and 33.20.040(A), 33.19.030, and 33.50.010 and .030. These sections suspend the TDR program, eliminates discriminatory references to "group homes," allow for emergency housing, emergency shelters, permanent supportive housing and transitional housing, and allow for ADUs within UGAs to be sold as condominiums.</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 12/8/2025</p>
<p>e. Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:</p> <ul style="list-style-type: none"> • Zoning that may have a discriminatory effect; • Disinvestment; and • Infrastructure availability 	No	Yes	<p>This update will need more specific documentation of specific policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing. See 31.02.281(2), Zoning definition for "household (33.03.010(48))," 31.02.320(3),</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 12/8/2025</p>

<p>RCW 36.70A.070(2)(e), new in 2021</p>			
<p>f. Establish policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions. RCW 36.70A.070(2)(f), new in 2021</p>	<p>Yes 31.02.283(3)(c)</p>	<p>Yes</p>	<p>See also new policy 31.02.281(2). In review of Clallam County's housing circumstance, specific racial disparities were not identified. The population of Clallam County as a whole, is economically challenged. Policies that support preservation and protection of mobile home parks and other low-income housing opportunities appear to hold the most promise for meeting the intent of this section.</p>
	<p>In Current Plan? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>
<p>g. Identification of areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments. RCW 36.70A.070(2)(g), new in 2021 Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing. RCW 36.70A.070(2)(h), new in 2021 See also: Support Materials for Racially Disparate Impacts, Exclusion and Displacement Work</p>	<p>No</p>	<p>Yes</p>	<p>This plan update will need to include more detail on the spatial distribution of displacement risk and an analysis of existing policies to ensure policies reduce and mitigate displacement.</p> <p>Completed: <input type="checkbox"/> Date:</p>

Capital Facilities Plan (CFP) Element

To serve as a check on the practicality of achieving other elements of the plan, covering all capital facilities planned, provided and paid for by public entities including local government and special districts, etc., including water systems, sanitary sewer systems, storm water facilities, schools, parks and recreational facilities, police and fire protection facilities. Capital expenditures from park and recreation elements, if separate, should be included in the CFP Element. The CFP Element must be consistent with CWPPs, and [RCW 36.70A.070\(3\)](#) amended in 2023. Changes made to this element through [HB 1181](#) (climate change and resiliency) are not required, although jurisdictions should make a good faith effort to incorporate these items to be consistent with the new legislation.

<p>a. The capital facilities plan element must identify the transportation facilities, and public facilities and services needed to serve the UGA and the funding to provide the transportation facilities and public facilities and services. RCW 36.70A.130 amended in 2022 (see SB 5593)</p>	<p>Yes CCC 31.02.810</p>	<p>No</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>b. Policies or procedures to ensure capital budget decisions are in conformity with the comprehensive plan. RCW 36.70A.120</p>	<p>Yes CCC 31.02.820(5)</p>	<p>No</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>c. An inventory of existing capital facilities owned by public entities, including green infrastructure. RCW 36.70A.070(3)(a) amended in 2023 and WAC 365-196-415(1)(a)</p>	<p>In Current Plan? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>
<p>d. A forecast of needed capital facilities. RCW 36.70A.070(3)(b) and WAC 365-196-415(1)(b) Note: The forecast of future need should be based on projected population and adopted levels of service (LOS) over the planning period.</p>	<p>No</p>	<p>Yes</p>	<p>Inventory included in updated CFP (Appendix I) Completed: <input checked="" type="checkbox"/> Date: 11/06/2025</p>
<p>e. Proposed locations and capacities of expanded or new capital facilities. RCW 36.70A.070(3)(c) and WAC 365-196-415(1)(c) and (3)(c)</p>	<p>Yes CCC 31.02.320</p>	<p>Yes</p>	<p>Forecast of needed capital facilities is provided in the updated Capital Facilities Plan (Appendix I). Completed: <input checked="" type="checkbox"/> Date: 11/06/2025</p>
<p></p>	<p>No</p>	<p>Yes</p>	<p>The proposed locations of future capital facility needs are included in the updated Capital Facilities Plan (Appendix I). Also, see new policy 31.02.320(3). Completed: <input checked="" type="checkbox"/> Date: 11/06/2025</p>

<p>Infrastructure investments should consider equity and plan for any potential displacement impacts.</p>										
<p>f. A six-year plan (at minimum) that will finance such capital facilities within projected funding capacities and identify sources of public money to finance planned capital facilities. <u>RCW 36.70A.070(3)(d)</u>, <u>RCW 36.70A.120</u>, <u>WAC 365-196-415(1)(d)</u></p>	<p>Yes</p>	<p>CCC 31.02.320(6)</p>	<p>Yes</p>	<p>The six-year funding mechanisms for financing capital facilities is included in the updated Capital Facilities Plan (Appendix I).</p>	<p>Completed: Date: 11/06/2025</p>					
<p>g. A policy or procedure to reassess the <u>land use element</u> if probable funding falls short of meeting existing needs. <u>RCW 36.70A.070(3)(e)</u>, <u>WAC 365-196-415(2)(d)</u> Note: park and recreation facilities shall be included in the capital facilities plan element</p>	<p>No</p>	<p>No</p>	<p>Yes</p>	<p>See amended policy 31.02.320(6)</p>	<p>Completed: Date: 11/20/2025</p>					
<p>h. If impact fees are collected: identification of public facilities on which money is to be spent. <u>RCW 82.02.050(5)</u> and <u>WAC 365-196-850(3)</u></p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>The Clallam County Comprehensive plan does not identify development impact fees as a source of public facility and service funding.</p>	<p>Completed: Date:</p>					
<p>i. Identify and include information about all public entities, including special purpose districts that own capital facilities. <u>RCW 36.70A.070(3)</u> amended in 2023</p>	<p>No</p>	<p>In Current Plan? Yes/No</p>	<p>Yes</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Completed: Date: 11/06/2025</p>	<p>Notes</p>	<p>Verify if the County has special purpose districts. Comprehensive plan will need an inventory of all capital/public facilities within County, such as school districts. See Capital Facilities Plan (Appendix I).</p>			
<p>Utilities Element</p>										
<p>Consistent with relevant CWPPs and RCW 36.70A.070(4) amended in 2023. Utilities include, but are not limited to: sanitary sewer systems, water lines, fire suppression, electrical lines, telecommunication lines, and natural gas lines. Changes made to this element through HB 1181 (climate change and resiliency) are not required, although jurisdictions should make a good faith effort to incorporate these items to be consistent with the new legislation.</p>										
<p>a. The general location, proposed location and capacity of all existing and proposed utilities, to</p>	<p>Yes</p>	<p>CCC 31.02.710</p>	<p>Yes</p>	<p>Currently, the comprehensive plan just covers electric and telecommunications. The update should include information on sewer, water, and</p>	<p>Completed: Date: 11/06/2025</p>					

<p>include telecommunications.</p> <p><u>RCW 36.70A.070(4)(a)</u> amended in 2023 and <u>WAC 365-196-420</u></p>	<p>Yes</p> <p>CCC 31.02.710</p>	<p>Yes(?)</p>	<p>solid waste as well even if managed by other entities. See Capital Facilities Plan (Appendix I).</p> <p>Reference to Public Utility District No. 1 of Clallam County. States it serves citizens and businesses of the county outside of Port Angeles. Does not mention who serves Port Angeles. See Capital facilities Plan (Appendix I).</p>	<p>Completed: <input checked="" type="checkbox"/></p> <p>Date: 11/6/2025</p>
<p>Transportation Element</p> <p>Consistent with relevant CWPPs and <u>RCW 36.70A.070(6)</u> amended in 2023 by <u>HB 1181</u>. See also the new <u>climate element</u> below for jurisdictional requirements.</p>				
<p>a. The transportation element must identify the transportation facilities, and public facilities and services needed to serve the UGA and the funding to provide the transportation facilities and public facilities and services. <u>RCW 36.70A.130</u> amended in 2022 (see <u>SB 5593</u>)</p>	<p>No</p>	<p>Yes</p>	<p>31.02.420(6) discusses financing, but it lacks the identification of transportation facilities, and public facilities and services needed to serve the UGA.</p>	<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
<p>b. An inventory of air, water, and ground transportation facilities and services, including transit alignments, state-owned transportation facilities, and general aviation airports. <u>RCW 36.70A.070(6)(a)(iii)(A)</u> amended in 2023 and <u>WAC 365-196-430(2)(c)</u>.</p>	<p>In Current Plan? Yes/No</p> <p>If yes, cite section</p> <p>Yes</p> <p>CCC Table 31.02.415(A). Public Use General Aviation Airports; CCC Figure 31.02.415(B) – Olympic Discovery Trail; CCC 31.03.130 Table 2. LOS Analysis for County Roads</p>	<p>Changes needed to meet current statute? Yes/No</p> <p>Yes</p>	<p>Notes</p> <p>Will need to update information in table. See amended 31.02.415.</p>	<p>Completed: <input checked="" type="checkbox"/></p> <p>Date: 11/20/2025</p>

	<p>(Build-out and Population Growth); CCC 31.03.130 Table 3. County Roads Less than Twenty (20) Feet in Width and over 125 ADT; CCC 31.04.110 Table 1. LOS Analysis for County Roads (Build-out and Population Growth); CCC 31.04.110 Table 3. County Road Segments Less than Twenty (20) Feet in Width and over 124 ADT</p>		
<p>c. Adopted multimodal levels of service (LOS) standards for all locally-owned arterials, transit routes and state highways. <u>RCW 36.70A.070(6)(a)(iii)(B)</u> and <u>(C)</u>, <u>WAC 365-196-430</u></p>	<p>Yes CCC 31.02.425; 31.02.430 Tables 8-10</p>	<p>No</p>	<p>CCC 31.02.425 - "...All marine and air transportation deficiencies are deferred to the Port of Port Angeles Comprehensive Scheme of Harbor Improvements, December, 1986. All State highway deficiencies will be deferred to the Peninsula Regional Transportation Planning Organization Regional Transportation Plan."</p> <p>Completed: <input type="checkbox"/> Date:</p>
<p>d. Identification of specific actions to bring transportation facilities and services to established multimodal LOS. <u>RCW 36.70A.070(6)(a)(iii)(D)</u> amended in 2023,</p>	<p>Yes CCC 31.02.432</p>	<p>Yes</p>	<p>Updated information needed. Comprehensive Plan refers to a Transit System Comp Plan for 1993-1998. See amended section 31.02.432.</p> <p>Completed: <input checked="" type="checkbox"/> Date: 10/22/2025</p>

<p><u>WAC 365-196-430</u></p>				
<p>e. A forecast of multimodal transportation for a minimum of 10 years including land use assumptions used in estimating travel. <u>RCW 36.70A.070(6)(a)(i)</u>, <u>RCW 36.70A.070(6)(a)(iii)(E)</u> amended in 2023, <u>WAC 365-196-430(2)(f)</u></p>	<p>No</p>	<p>Yes</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>f. A projection of state and local system needs to equitably meet current and future demand and equitably implement the multimodal network. <u>RCW 36.70A.070(6)(a)(iii)(E)</u> amended in 2023, <u>WAC 365-196-430(1)(c)(vi)</u> and <u>RCW 47.06</u></p>	<p>No</p>	<p>Yes</p>	<p>See amended section 31.02.425 at paragraph 3. Also see Traffic Projection Volume Map and Roadway LOS (Appendix L).</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/06/2025</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	Completed: Date:
<p>g. A transition plan for transportation as required in <u>Title II of ADA</u>. Perform self-evaluations of current facilities and develop a program access plan to address deficiencies and achieve the identification of physical obstacles, establish methods, perform modifications and identify leadership roles. <u>RCW 36.70A.070(6)(a)(iii)(G)</u> new in 2023.</p>	No	Yes	A transition plan for Transportation will be required. See new section 31.02.420(1)(e)(vii).	Completed: <input checked="" type="checkbox"/> Date: 11/20/2025
<p>h. An active transportation component to include collaborative efforts to identify and designate planned improvements for active transportation facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles. <u>RCW 36.70A.070(6)(a)(vii)</u> amended in 2023, <u>WAC 365-196-430(2)(i)</u></p>	Yes CCC 31.02.440-442	Yes	Bicycle sections should be expanded to include pedestrian facilities and renamed "Active Transportation." May be good to have a section that talks about recreational routes (Olympic Discovery trail), bike infrastructure for everyday tasks (greenbelts and bike lanes), and their intersectional use.	Completed: <input type="checkbox"/> Date:
<p>i. A description of any existing and planned transportation demand management (TDM) strategies, such as HOV lanes or subsidy programs, parking policies, etc. <u>RCW 36.70A.070(6)(a)(vi)</u> and <u>WAC 365-196-430(2)(i)(i)</u></p>	Yes CCC 31.02.420(1)(i)(vi)	No		Completed: <input type="checkbox"/> Date:
<p>j. An analysis of future funding capability to judge needs against probable funding resources. <u>RCW 36.70A.070(6)(a)(iv)(A)</u>, <u>WAC 365.196-430(2)(k)(iv)</u></p>	No	No	This analysis is accomplished in the Six Year Transportation Improvement Program process (6-year TIP).	Completed: <input type="checkbox"/> Date:
<p>k. A multi-year financing plan based on needs identified in the comprehensive plan, the appropriate parts of which serve as the basis for the 6-year street, road or transit program. <u>RCW 36.70A.070(6)(a)(iv)(B)</u> and <u>RCW 35.77.010</u>, <u>WAC 365-196-430(2)(k)(ii)</u></p>	No	No	This analysis is accomplished in the Six Year Transportation Improvement Program process (6-year TIP).	Completed: <input type="checkbox"/> Date:

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>l. If probable funding falls short of meeting identified needs of the transportation system, including state transportation facilities, a discussion of how additional funds will be raised, or how land use assumptions will be reassessed to ensure that LOS standards will be met. <u>RCW 36.70A.070(6)(a)(v)(C)</u>, amended in 2023, <u>WAC 365-196-430(2)(i)(iii)</u>.</p>	<p>Yes CCC 31.02.420(6)(e) and (f)</p>	<p>yes</p>	<p>Discuss grants, local taxes and funds, and other funding sources to implement capital projects. Does Clallam have a capital improvement program? Leveraging new development to incur costs of updating affected transportation routes and services. See amended section 31.02.420(6)(e).</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 12/04/2025</p>
<p>m. A description of intergovernmental coordination efforts, including an assessment of the impacts of the transportation plan and land use assumptions on the transportation systems of adjacent jurisdictions and how it is consistent with the regional transportation plan. <u>RCW 36.70A.070(6)(a)(v)</u>; <u>WAC 365-196-430(1)(e)</u> and <u>430(2)(a)(iii)</u>.</p>	<p>Yes CCC 31.02.420(4) Policy 28 CCC 31.02.420(3)(b)</p>	<p>Yes</p>	<p>More discussion with coordination between county and Clallam Transit, Jefferson County transit service, and consistency with regional transportation plan. How are the UGAs involved? See amended section 31.02.420(3)(i), and 31.02.420(1)(c)(4).</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/20/2025</p>

Rural Element

Consistent with [RCW 36.70A.070\(5\)](#), [RCW 36.70A.011](#), [RCW 36.70A.030 \(15, 16 and 17\)](#), and should consider [WAC 365-196-425](#). Rural lands are lands not included in urban growth areas or designated as agricultural, forest, or mineral resource lands.

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>a. A rural element that:</p> <ul style="list-style-type: none"> Establish patterns of rural densities and uses considering local circumstances, including a written record explaining how the rural element harmonizes the planning goals of the GMA and meets the requirements of RCW 36.70A.070(5); Allows rural development, forestry and agriculture in rural areas; Provides for a variety of rural densities, uses, essential public facilities and rural governments services; and Includes measures that apply to rural development and protects the rural character of the area. Establishes policies for Limited Areas of More Intense Rural Development (LAMIRDs) <p>RCW 36.70A.030 (15, 16 and 17), RCW 36.70A.070(5), WAC 365-196-425</p> <p>Note: this subsection shall not be interpreted to permit in the rural area a major industrial development or a master planned resort unless otherwise specifically permitted under RCW 36.70A.360 and RCW 36.70A.365</p>	<p>Yes CCC 31.02.263(4)(a)-(f)</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>b. Policies that limit urban services in rural areas. RCW 36.70A.110(4) amended in 2021 Note: The plan may include optional techniques such as limited areas of more intensive rural development (LAMIRDs), clustering, density transfer, design guidelines, and conservation easements to accommodate rural uses not characterized by urban growth as specified in RCW 36.70A.070(5)(b), (d) amended in 2021 (SB 5275), WAC 365-196-425(4)</p>	<p>Yes CCC 31.02.263(4)(c) and (d)</p>	<p>No</p>	<p>Could include optional techniques such as limited areas of more intensive rural development (LAMIRDs), clustering, density transfer, design guidelines, and conservation easements to accommodate rural uses not characterized by urban growth</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>Shoreline For shorelines of the state, the goals and policies of the shoreline management act as set forth in RCW 90.58.020 are added as one of the goals of the Growth Management Act (GMA) as set forth in RCW 36.70A.480. The goals and policies of a shoreline master program for a county or city approved under RCW 90.58 shall be considered an element of the county or city's comprehensive plan.</p>				
<p>a. The policies, goals, and provisions of RCW 90.58 and applicable guidelines shall be the sole basis for determining compliance of a shoreline master program with this chapter except as the shoreline master program is required to comply with the internal consistency provisions of RCW 36.70A.070, 36.70A.040(4), 35.63.125, 35A.63.105, 36.70A.480</p>	<p>Yes CCC Title 35</p>	<p>Yes</p>	<p>SMP is encoded in the County's code as Title 35. See amended policy 31.02.340(1)(c) and 31.02.340(6)(b) & (c).</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/10/2025</p>
<p>b. Shoreline master programs shall provide a level of protection to critical areas located within shorelines of the state that assures no net loss of shoreline ecological functions necessary to sustain shoreline natural resources as defined by WA State Department of Ecology (Ecology) guidelines adopted pursuant to RCW 90.58.060. See Ecology's Shoreline planners' toolbox for the SMP Checklist and other resources.</p>	<p>Yes CCC Title 35.35</p>	<p>No</p>	<p>SMP is encoded in the County's code as Title 35.</p>	<p>Completed: <input type="checkbox"/> Date:</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	Completed: Date:
<p>c. Shorelines of the state shall not be considered critical areas under this chapter except to the extent that specific areas located within shorelines of the state qualify for critical area designation based on the definition of critical areas provided by <u>RCW 36.70A.030(5)</u> and have been designated as such by a local government pursuant to <u>RCW 36.70A.060(2)</u>.</p>	No	No		Completed: <input type="checkbox"/> Date:
<p>d. If a local jurisdiction's master program does not include land necessary for buffers for critical areas that occur within shorelines of the state, as authorized by <u>RCW 90.58.030(2)(f)</u>, then the local jurisdiction shall continue to regulate those critical areas and their required buffers pursuant to <u>RCW 36.70A.060(2)</u>.</p>	Yes CCC 35.30.030 Table 6-1	No		Completed: <input type="checkbox"/> Date:
Provisions for siting essential public facilities (EPFs)				
Consistent with CWPPs and RCW 36.70A.200 amended in 2021. This section can be included in the Capital Facilities Element, Land Use Element, or in its own element. Sometimes the identification and siting process for EPFs is part of the CWPPs.				
<p>a. A process or criteria for identifying and siting essential public facilities (EPFs). <u>RCW 36.70A.200</u> and <u>WAC 365-196-550(1)</u></p> <p>Notes: <u>RCW 36.70A.200</u> amended 2021 regarding reentry and rehabilitation facilities. EPFs are defined in RCW 36.70A.200.</p> <p>Regional transit authority facilities are included in the list of essential public facilities.</p>	Yes CCC 31.02.810	No	The section is currently called Capital Facilities Plan. Should be renamed "Essential Public Facilities". Needs updating to include <u>RCW 36.70A.200</u> amended 2021 regarding reentry and rehabilitation facilities. The process for identifying locations and procedures for siting EPF's is located on pages 15 & 16, Clallam Countywide Planning Policies and specifically references RCW 36.70A.200. See amended policy 31.02.300(8). Standards to be developed as part of 2026 work plan updating Zoning Code.	Completed: <input type="checkbox"/> Date:
<p>b. Policies or procedures that ensure the comprehensive plan does not preclude the siting of EPFs. <u>RCW 36.70A.200(5)</u></p> <p>Note: If the EPF siting process is in the CWPPs,</p>	Yes Subsection 9 of "Siting of Public Capital Facilities" under the CWPP	No	The County shall consider adding a policy confirming that nothing in the comp plan should preclude the siting of EPF's. See amended policy 31.02.300(8).	Completed: <input type="checkbox"/> Date:

this policy may be contained in the comprehensive plan as well. WAC 365-196-550(3)	addresses this issue concerning EPFs.	Changes needed to meet current statute? Yes/No	Notes	
<p>Tribal Participation in Planning New in 2022 (see HB 1717). A federally recognized Indian tribe may voluntarily choose (opt-in) to participate in the local and regional planning processes. See Commerce's new Tribal Planning Coordination for GMA webpage for guidance and staff contacts.</p>				
<p>a. Mutually agreeable memorandum of agreement between local governments and tribes in regard to collaboration and participation in the planning process unless otherwise agreed at the end of a mediation period. RCW 36.70A.040(8)(a), new in 2022, RCW 36.70A.190, new in 2022</p>	<p>No</p>	<p>No</p>	<p>HB 1717 requirements will need to be demonstrated in the updated plan. The planning process includes an engagement plan that builds in tribal collaboration and participation. All five Tribal Nations within or affiliated within the boundary of Clallam County were provided individual and repeated notice of the CPU process and opportunity for comment. Clallam County received multiple comments from three Tribal nations, incorporated said comments into draft changes, and provided summary to the Tribal entities of actions taken. No Tribe provided a tribal resolution indicating their desire to initiate a parallel planning process; hence, no MOA has been developed in accordance with RCW 36.70A.040(8)(a).</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>b. Urban Growth Areas: counties and cities coordinate planning efforts for any areas planned for urban growth with applicable tribe(s). RCW 36.70A.110(1), amended 2022, RCW 36.70A.040(8)</p>	<p>No</p>	<p>No</p>	<p>HB 1717 requirements will need to be demonstrated in the updated plan. The planning process includes an engagement plan that builds in tribal collaboration and participation. Section 3.6 of the County's Public Engagement Plan (12/5/2024) details Tribal outreach, invitation to</p>	<p>Completed: <input type="checkbox"/> Date:</p>

				participate, and information sharing, which the County has executed completely.	
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Climate Change and Resiliency

New in 2023, see HB 1181. RCW and WAC updates are forthcoming.

A new required element for comprehensive plans and new goal of the GMA. Designed to reduce greenhouse gas (GHG) emissions, plan for resilience and support environmental justice. Climate elements must maximize economic, environmental and social co-benefits and prioritize environmental justice in order to avoid worsening environmental health disparities. A climate element can take the form of a single comprehensive plan chapter or be integrated into several chapters/elements such as housing, transportation and land use. Visit [Commerce's Climate Program](#) webpage for further guidance, grants, tools and staff contacts.

These requirements for GHG emissions reduction and resilience apply to the following counties and their cities with a population greater than 6,000 as of April 1, 2021. Please also review [Appendix B](#) for requirements due in the upcoming [periodic update](#).

- June 30, 2025 Deadline: Clark, Skagit, Thurston, Whatcom
- June 30, 2026 Deadline: Benton, Franklin, Spokane
- June 30, 2029 Deadline: These jurisdictions are only required to update two elements this cycle – the transportation and climate elements

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	Completed: Date:
a. Greenhouse gas emissions reduction sub-element: must include goals and policies to reduce emissions and vehicle miles traveled. This sub-element is mandatory for the state's largest and fastest-growing counties and the cities within those counties. RCW 36.70A.070(9) , new in 2023	No	No	N/A (Clallam is not required to include the GHG's sub-element.)	Completed: <input type="checkbox"/> Date:
b. Resiliency sub-element: must include goals and policies to improve climate preparedness, response and recovery efforts. This is mandatory for all counties and cities fully planning under the GMA and encouraged for others. RCW 36.70A.070(9) , new in 2023	No	Yes	Clallam County will need to develop a resiliency sub-element as part of this plan update. New section 31.02.820 includes policies for implementing resiliency across 13 key sectors for all Clallam County.	Completed: <input checked="" type="checkbox"/> Date: 8/12/2025

Future required elements: pending state funding

As of 2022, these elements have not received state funding to aid local jurisdictions in implementation. Therefore, these elements are not required to be added to comprehensive plans at this time. Commerce encourages jurisdictions to begin planning for these elements, pending the future mandate.

	In Current Plan? Yes/No If yes, cite section	Notes
<p>Economic Development Although included in RCW 36.70A.070, amended in 2017, "mandatory elements" an economic development element is not currently required because funding was not provided to assist in developing local elements when this element was added to the GMA. However, provisions for economic growth, vitality, and a high quality of life are important, and supporting strategies should be integrated with the land use, housing, utilities, and transportation elements.</p>	<p>Yes CCC 31.02.610 (Economic Development Issues) and .620 (Economic Development Goals)</p>	<p>Data from 1994-2004. Data should be updated. Data updated to Section 31.02.610.</p> <p>Completed: <input checked="" type="checkbox"/> Date: 11/28/2025</p>
<p>Parks and Recreation Implements and is consistent with the capital facilities plan. Include a ten-year demand estimate, evaluation of service and facilities needs and evaluation of tree canopy coverage within UGAs. RCW 36.70A.070(8), amended in 2023 Although included in RCW 36.70A.070, amended in 2017, "mandatory elements" a parks and recreation element is not required because the state did not provide funding to assist in developing local elements when this provision was added to the GMA. However, park, recreation, and open space planning are GMA goals, and it is important to plan for and fund these facilities.</p>	<p>No</p>	<p>No stand alone Parks and Recreation element. However, it is called out in the Capital Facilities element. Does not include a ten-year demand estimate, evaluation of service and facilities needs and evaluation of tree canopy coverage within UGAs. The Clallam County Parks, Fair and Maintenance Department is currently in the process of updated the Parks Master Plan, which includes a funding component.</p> <p>Completed: <input type="checkbox"/> Date: 2026</p>

Optional Elements

Pursuant to RCW 36.70A.080, a comprehensive plan may include additional elements, items, or studies dealing with other subjects relating to the physical development within its jurisdiction, including, but not limited to:

	In Current Plan? Yes/No If yes, cite section	Notes	
Sub-Area Plans	Yes	There are regional plans for Sequim-Dungeness, Port Angeles, the Straits, Western, and Forks.	Completed: <input type="checkbox"/> Date:
Conservation	No		Completed: <input type="checkbox"/> Date:
Recreation	No		Completed: <input type="checkbox"/> Date:
Solar Energy	No		Completed: <input type="checkbox"/> Date:

Consistency is required by the GMA

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>a. All plan elements must be consistent with relevant county-wide planning policies (CWPPs) and, where applicable, multi-county planning policies (MPPs) and the GMA. RCW 36.70A.100 and 210, WAC 365-196-305; 400(2)(c); 510 and 520</p>	<p>Yes 31.02.210, .220, and .240(6)</p>		<p>CWPP was adopted in 2018 and is stated that it should be reviewed every 5 years (2023). The county comprehensive plan has many sections written prior to 2018. A gap analysis should be performed to ensure compliance. There is one reference to CWPP and it references the 1992 CWPP (see 31.02.520(2)(c)(ii)). See new Section 31.02.100(1). The CPPs and CPU are internally consistent and compliant, Will be reviewed in five years as required.</p>	<p>Completed: Date: 12/8/2025</p>
<p>b. All plan elements must be consistent with each other. RCW 36.70A.070 (preamble) and WAC 365-197-040</p>	<p>Yes Current plan elements are cross-referenced in numerous locations.</p>	<p>Yes</p>	<p>Revised elements will have to be analyzed to ensure they remain consistent with each other. Consistency review revealed no conflicts with consistency.</p>	<p>Completed: Date: 12/16/2025</p>
<p>c. The plan must be coordinated with the plans of adjacent jurisdictions. RCW 36.70A.100 and WAC 365-196-520</p>	<p>Yes CCC 31.02.420(5)(b); 31.02.620(1)(i)(iv)</p>	<p>Yes</p>	<p>The county's plan speaks to Jefferson County coordination strictly regarding transportation. Clallam should speak to coordination beyond transportation in elements such as land use, economic development, and natural resources. References to Jefferson County's Comprehensive Plan would aid this. Clallam County Planning engages with counterparts in Jefferson County and the included cities on a monthly basis to discuss planning and coordinated efforts Jefferson County will be notified upon the release of the CPU. lth two</p>	<p>Completed: <input type="checkbox"/> Date:</p>

			<p>fundamental boundaries, Clallam & Jefferson Counties either have rural residential (east Clallam boundary) or Commercial Forest resource lands (southwest boundary) abutting similar designations in Jefferson County. The challenges of land use coordination and influence on the neighboring jurisdiction is minimal.</p>	
Public Participation				
<p>a. Plan ensures public participation in the comprehensive planning process. <u>RCW 36.70A.020(1)</u>, <u>.035</u>, and <u>.140</u>, <u>WAC 365-196-600(3)</u> provide possible public participation choices.</p>	<p>Yes CCC 31.01.500</p>	<p>No</p>	<p>The update shall include a summary of the engagement work guided by an engagement plan as developed by the County and consultants in 2024. A report on public, jurisdictional, and Tribal engagement consistent with the Clallam County Public Engagement Plan, will be provided at conclusion of public process.</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>b. If the process for making amendments is included in the comprehensive plan:</p> <ul style="list-style-type: none"> The plan provides that amendments are to be considered no more often than once a year, not including the exceptions described in <u>RCW 36.70A.130(2)</u>, <u>WAC 365-196-640</u> The plan sets out a procedure for adopting emergency amendments and defines emergency. <u>RCW 36.70A.130(2)(b)</u> and <u>RCW 36.70A.390</u> new in 2021, (<u>HB 1220</u> sections 3-5), <u>WAC 365-196-650(4)</u> 	<p>Yes CCC 31.08.300, .305, and .310</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>

	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>c. Plan or program for monitoring how well comprehensive plan policies, development regulations, and other implementation techniques are achieving the comp plan's goals and the goals of the GMA. WAC 365-196-660 discusses a potential review of growth management implementation on a systematic basis.</p> <p>New 2022 legislation HB 1241 provides that those jurisdictions with a periodic update due in 2024 have until December 31, 2024 to submit. This legislation also changed the update cycle to every ten years after the 2024-2027 cycle. Jurisdictions that meet the new criteria described in RCW 36.70A.130(9) will be required to submit an implementation progress report five years after the review and revision of their comprehensive plan.</p>	<p>Yes CCC 31.08.200(12)</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>d. Considerations for preserving property rights. Local governments must evaluate proposed regulatory or administrative actions to assure that such actions do not result in an unconstitutional taking of private property, RCW 36.70A.370. For further guidance see the 2018 Advisory Memo on the Unconstitutional Taking of Private Property</p>	<p>Yes CCC 31.08.200(1)</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>e. Encourage the involvement of citizens in the planning process, including the participation of vulnerable populations and overburdened communities, and ensure coordination between communities and jurisdictions to reconcile conflicts. HB 1181 (2023) revised RCW 36.70A.020 Planning Goals for inclusion of vulnerable populations and overburdened communities. RCW 36.70A.035 Public</p>	<p>Yes CCC 31.01.500</p>	<p>Yes</p>	<p>The revision to this section shall describe how the engagement plan and resulting engagement includes the participation of vulnerable populations and overburdened communities. The Clallam County Public Engagement Plan (December 2024) included efforts such as specific Tribal outreach, notice of process and comment</p>	<p>Completed: <input type="checkbox"/> Date:</p>

<p>Participation was not amended under HB 1181.</p>			<p>opportunities in Spanish, and community engagement meetings—all of which were accomplished throughout the process. A report on public engagement will be provided upon completion of the public process.</p>	
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Section II: Development Regulations

Must be consistent with and implement the comprehensive plan. [RCW 36.70A.040](#), [WAC 365-196-800](#) and [810](#)

Critical Areas

Regulations protecting critical areas are required by [RCW 36.70A.060\(2\)](#), [RCW 36.70A.172\(1\)](#), [WAC 365-190-080](#) and [WAC 365-195-900](#) through [925](#).

Please visit Commerce's [Critical Areas webpage](#) for resources and to complete the [Critical Areas Checklist](#). Critical areas regulations must be reviewed and updated, as necessary, to incorporate legislative changes and best available science. Jurisdictions using periodic update grant funds to update critical areas regulations must submit the critical areas checklist as a first deliverable, in addition to this periodic update checklist.

Zoning Code

Note: Please review the new 2023 housing laws in the [Washington State Housing Laws of 2019 through 2023](#) guidance, on Commerce's [Planning for Housing webpage](#).

In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>Notice: For more information about housing regulatory changes regarding supportive housing types, see Supportive Housing Types Review Checklist on the Updating GMA Housing Elements webpage. And for additional information on middle housing and ADU regulations, see the Middle Housing webpage.</p>			
<p>a. Zoning designations are consistent and implement land use designations that accommodate future housing needs by income bracket as allocated through the countywide planning process. (RCW 36.70A.070(2)(c) - Amended in 2021 with HB 1220)</p> <p>Note: Zoning must reflect sufficient land capacity for all income</p>	Yes	Group homes included in Sequim and Carlsborg UGAs. Per the LCA, increases in density are proposed within the Sequim UGA and Clallam Bay/Seki UGA with demonstrated sufficient capacity (vacant and unused capacity) to accommodate all growth targets by income segments. The TDR program has been suspended as it has not yet been used and only has acted as a barrier to higher-density housing, and provisions for emergency housing, emergency shelters, permanent supportive housing and transitional housing has been accommodated in the Zoning Code update, among others.	<p>Completed: <input checked="" type="checkbox"/> Date: 10/18/2025</p>

housing needs, including emergency housing and permanent supportive housing.	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>b. The number of unrelated persons that occupy a household or dwelling unit except as provided in state law, for short term rentals, or occupant load per square foot shall not be regulated or limited by counties. (HB 5235), RCW 36.01.227 new in 2021</p>	<p>Yes Definitions - CCC 33.03.010.100</p>	<p>yes</p>	<p>"Single-family dwelling" means a dwelling unit detached from any other dwelling unit and intended for occupation by one family and including accessory improvements and uses. This definition includes manufactured homes such as mobile homes, modular homes and other homes manufactured in components or as one complete dwelling unit. Proposed new definition for "household" (3.03.010(48)) address the concerns of this section.</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/18/2025</p>
<p>c. Family day care providers are allowed in all residential dwellings located in areas zoned for residential or commercial RCW 36.70A.450. Review RCW 43.216.010 for definition of family day care provider and WAC 365-196-865 for more information.</p>	<p>Yes CCC 33.10; 33.13</p>	<p>Yes</p>	<p>Residential dwellings allowed in Rural Limited Commercial zone (RLC 33.15.060), but Family Day care centers are prohibited. Most residential zones already allowed. Proposed changes to DPA (33.15.035), RLC (33.15.060), TR (33.15.067), UNC (33.15.070), URC (33.15.080), and UC (33.15.090) zones.</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 10/28/2025</p>
<p>d. Manufactured housing is regulated the same as site built housing. RCW 36.01.225 amended in 2019. A local government may require that manufactured homes: (1) are new, (2) are set on a permanent foundation, and (3) comply with local design standards applicable to other homes in the neighborhood, but may not discriminate against consumer choice in housing. See: National Manufactured Housing</p>	<p>Yes CCC 33.03.010.100</p>	<p>No</p>	<p>Single-family dwelling definition includes manufactured homes such as mobile homes, modular homes and other homes manufactured in components or as one complete dwelling unit.</p>	<p>Completed: <input type="checkbox"/> Date:</p>

Construction and Safety Standards Act of 1974					
<p>e. Within urban growth areas, accessory dwelling units: counties (and cities) must adopt or amend by ordinance, and incorporate into their development regulations, zoning regulations and other official controls.</p> <p>RCW 36.70A.680 amended in 2023, RCW 36.70A.681 amended in 2023, RCW 36.70A.070(d)(iv), RCW 36.70A.696 amended in 2023, RCW 36.70A.699 amended in 2020.</p> <p>See new Commerce guidance on the Middle Housing webpage</p>	<p>Yes</p> <p>CCC 33.50</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>	
<p>f. Residential structures occupied by persons with handicaps, and group care for children that meets the definition of "familial status" are regulated the same as a similar residential structure occupied by a family or other unrelated individuals. No city or county planning under the GMA may enact or maintain ordinances, development regulations, or administrative practices which treat a residential structure occupied by persons with handicaps differently than a similar residential structure occupied by a family or other unrelated individuals.</p>	<p>Yes</p> <p>CCC 33.19; 33.20</p>	<p>Changes needed to meet current statute? Yes/No</p> <p>Yes</p>	<p>In Current Regs? Yes/No If yes, cite section</p>	<p>Notes</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 10/8/2025</p>

<p>RCW 36.70A.410, RCW 70.128.140 and 150, RCW 49.60.222-225 and WAC 365-196-860</p>			
<p>g. Within UGAs, affordable housing programs enacted or expanded under RCW 36.70A.540 amended in 2022 comply with the requirements of this section. Examples of such programs may include: density bonuses within urban growth areas, height and bulk bonuses, fee waivers or exemptions, parking reductions, expedited permitting conditioned on provision of low-income housing units, or mixed-use projects. WAC 365-196-300 See also RCW 36.70A.545 and WAC 365-196-410(2)(e)(i) "affordable housing" is defined in RCW 84.14.010 Review RCW 36.70A.620(3) amended in 2020, for minimum residential parking requirements.</p>	<p>No</p>	<p>Yes</p>	<p>Clallam County does not currently use any of the tools covered by RCW 36.70A.540. However, if new code is developed as a result of this plan, the resulting code will have to comply with this statute and others. No action required unless and until incentive programs area implemented.</p> <p>Completed: <input type="checkbox"/> Date:</p>
<p>h. Limitations on regulating: outdoor encampments, safe parking efforts, indoor overnight shelters and temporary small houses on property owned or controlled by a religious organization. RCW 36.01.290 amended in 2020, RCW 35.21.915 amended in 2020</p>	<p>No</p>	<p>Yes</p>	<p>Clallam County will need to amend CCC Title 31 to make allowances for outdoor encampments, safe parking sites, indoor overnight shelters, and temporary small houses on property owned or controlled by a religious organization. See new Section 31.02.283(3)(m).</p> <p>Completed: <input type="checkbox"/> Date:</p>
	<p>In Current Regs? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>
<p>i. Within UGAs, allow an increased density bonus consistent with local needs for any affordable housing development of any single-family or</p>	<p>No</p>	<p>Yes</p>	<p>Clallam County does not currently use any of the tools covered by RCW 36.70A.545. However, if new code is developed as a result of this plan, the resulting code will have to comply with this statute and</p> <p>Completed: <input type="checkbox"/> Date:</p>

<p>multi-family residence located on real property owned or controlled by a religious organization. RCW 36.70A.545, amended in 2019 (HB 1377).</p>			<p>others. No action required unless and until incentive programs area implemented.</p>	
<p>j. Must not adopt, impose, or enforce requirements on an affordable housing development that are different than the requirements imposed on housing developments generally. RCW 36.130.020 (2008) Note: This applies to cities, counties, other local government entities and agencies.</p>	<p>No</p>	<p>Yes</p>	<p>Clallam County does not currently have affordable housing regulations. No action required unless and until incentive programs area implemented.</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>k. Rural regulations allow innovative techniques such as clustering, density transfer, design guidelines, and conservation easements to support rural economic advancement, a variety of densities, and uses that are not characterized by urban growth and that are consistent with rural character. RCW 36.70A.070(5)(b) and (c) and WAC 365-196-425(5)</p>	<p>Yes CCC 33.10</p>	<p>No</p>	<p>Cluster developments in Rural Zones (CCC 33.10)</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>l. Adopt policies and regulations related to rural regulations for Type 1, 2 and 3 Limited Areas of More Intense Rural Development (LAMIRDs). RCW 36.70A.070 (5)(d), see also WAC 365-196-425(6)</p>	<p>Yes CCC 33.22</p>	<p>No</p>	<p>LAMIRD CCC Chapter 33.22</p>	<p>Completed: <input type="checkbox"/> Date:</p>

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>m. Regulations discourage incompatible uses around general aviation airports. RCW 36.70.547 and WAC 365-196-455. Incompatible uses include: high population intensity uses such as schools, community centers, tall structures, and hazardous wildlife attractants such as solid waste disposal sites, wastewater or stormwater treatment facilities, or stockyards.</p> <p>For more guidance, see WSDOT's Aviation Land Use Compatibility Program.</p>	<p>Yes CCC 33.08</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>n. If a U.S. Department of Defense (DoD) military base employing 100 or more personnel is within or adjacent to the jurisdiction, zoning should discourage the siting of incompatible uses adjacent to military base. RCW 36.70A.530(3) and WAC 365-196-475. Visit Military One Source to locate any bases in your area and help make determination of applicability. If applicable, inform the commander of the base regarding amendments to the comprehensive plan and development regulations on lands adjacent to the base.</p>	<p>Not applicable</p>	<p>Not Applicable</p>		<p>Completed: <input type="checkbox"/> Date:</p>

<p>o. Electric vehicle infrastructure (jurisdiction specified: adjacent to Interstates 5, 90, 405 or state route 520 and other criteria) must be allowed as a use in all areas except those zoned for residential, resource use or critical areas. RCW 36.70A.695</p>	Not Applicable	Not Applicable	Not Applicable	Completed: <input type="checkbox"/> Date:
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Shoreline Master Program Consistent with RCW 90.58 Shoreline Management Act of 1971				
	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	Completed: <input type="checkbox"/> Date:
a. Zoning designations are consistent with Shoreline Master Program (SMP) environmental designations. RCW 36.70A.480	Yes See Clallam County Shoreline Environmental Designations (SED) Map	No		Completed: <input type="checkbox"/> Date:
b. If updated to meet RCW 36.70A.480 (2010), SMP regulations provide protection to critical areas in shorelines that is at least equal to the protection provided to critical areas by the critical areas ordinance. RCW 36.70A.480(4) and RCW 90.58.090(4) See Ecology's shoreline planners' toolbox for the SMP Checklist and other resources and Ecology's	Yes CCC 35.35	No		Completed: <input type="checkbox"/> Date:

Shoreline Master Programs Handbook webpage			
Resource Lands Defined in RCW 36.70A.030 (3, 12 and 17) and consistent with RCW 36.70A.060 and RCW 36.70A.170			
<p>a. Zoning is consistent with natural resource lands designations in the comprehensive plan and conserves natural resource lands. RCW 36.70A.060(3), WAC 365-196-815 and WAC 365-190-020(6). Consider innovative zoning techniques to conserve agricultural lands of long-term significance RCW 36.70A.177(2). See also WAC 365-196-815(3) for examples of innovative zoning techniques.</p>	<p>Yes. 33.07.010 and .020. Also, 31.02.115 through .190</p>		<p>To verify with county the presence or absence of the future land use map. Comprehensive Plan Land Use Map is also utilized as the County's Zoning Map, which can be viewed at: https://clallam-county-portal-clallam.hub.arcgis.com/pages/4ac75d8211584f50a63faffa5325470d</p> <p>Completed: <input type="checkbox"/> Date:</p>

	Notes	Changes needed to meet current statute? Yes/No	In Current Regs? Yes/No If yes, cite section
<p>b. Regulations to assure that use of lands adjacent to natural resource lands does not interfere with natural resource production. RCW 36.70A.060(1)(a) and WAC 365-190-040 Regulations require notice on all development permits and plats within 500 feet of designated natural resource lands that the property is within or near a designated natural resource land</p>	<p>Clallam County should amend code to require notice on all development permits and plats within 500 feet of designated natural resource lands that the property is within or near a designated natural resource land. See new requirement under 33.40.110</p>	<p>Yes</p>	<p>No</p> <p>Completed: <input checked="" type="checkbox"/> Date: 12/2/2025</p>

on which a variety of commercial activities may occur that are regulations to implement comprehensive plan					
c. For designated agricultural land, regulations encourage nonagricultural uses to be limited to lands with poor soils or otherwise not suitable for agricultural purposes. Accessory uses should be located, designed and operated to support the continuation of agricultural uses. RCW 36.70A.177(3)(b)	No	Yes	See amended section 31.02.115(3)(c)	Completed: <input checked="" type="checkbox"/> Date: 11/20/2025	
d. Counties must conduct a comprehensive countywide analysis when classifying, designating and de-designating natural resource lands. WAC 365-190-040(10)(c)	Yes CCC 31.08.200(12)	No		Completed: <input type="checkbox"/> Date:	
e. Designate mineral lands and associated regulations as required by RCW 36.70A.131 and WAC 365-190-040(5) . For more information review the WA State Dept. of Natural Resources (DNR)'s Geology Division site	Yes, 31.02.150 through 190, and 33.07.045.	Yes		Completed: <input type="checkbox"/> Date:	

Siting Essential Public Facilities

Regulations for siting essential public facilities should be consistent with [RCW 36.70A.200](#) and consider [WAC 365-196-550](#). Essential public facilities include those facilities that are typically difficult to site, such as airports, state education facilities, state or regional transportation facilities, state and local correctional facilities, solid waste handling facilities, and in-patient facilities including substance abuse facilities, mental health facilities, group

homes, and secure community transition facilities. Regulations may be specific to a local jurisdiction, but may be part of county-wide planning policies (CWPPs).

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>Regulations or CWPPs include a process for siting EPFs and ensure EPFs are not precluded. RCW 36.70A.200 amended in 2023, WAC 365-196-550(6) lists process for siting EPFs. WAC 365-196-550(3) details preclusions. EPFs should be located outside of known hazardous areas.</p> <p>Visit Commerce's Behavioral Health Facilities Program page for information on establishing or expanding new capacity for behavioral health EPFs.</p> <p>Note: RCW 36.70A.200 amended by SB 5536 to include EPFs for opioid treatment programs</p>	<p>Yes CWPP page 15-16</p>	<p>Yes</p>	<p>The Clallam CWPP speaks to the requirements outlined in the WAC and how the Comp plans and local regulations of the cities within Clallam need to adopt EPF siting processes but lacks implantation.</p>	<p>Completed: <input type="checkbox"/> Date:</p>

Subdivision Code

Subdivision Code	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>a. Subdivision regulations are consistent with and implement comprehensive plan policies. RCW 36.70A.030(5) and 36.70A.040(4).</p>	<p>Yes CCC 29.10.100</p>	<p>No</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>b. Written findings to approve subdivisions establish adequacy of public facilities. RCW 58.17.110 amended in 2018</p> <ul style="list-style-type: none"> • Streets or roads, sidewalks, alleys, other public ways, transit stops, and other features that assure safe walking conditions for students. • Potable water supplies, sanitary wastes, and drainage ways. RCW 36.70A.590 amended 2018 • Open spaces, parks and recreation, and playgrounds • Schools and school grounds <p>Other items related to the public health, safety and general welfare WAC 365-196-820(1).</p>	<p>Yes CCC 29.30.200(15); 29.30.300(3); 29.30.400(1)(c); 29.30.500(3);</p>	<p>Yes</p>	<p>Provisions for open spaces, parks and recreation, playgrounds, and schools and school grounds are not mentioned in Chapter 29.30 -STANDARDS FOR SUBDIVISIONS, SHORT SUBDIVISIONS, LARGE LOT DIVISIONS. This should be updated to include these standards. All land divisions are required to comply with the policies of the Comprehensive Plan. We do not have park standards as the parks plan is not funded (RCW36.70A.070(10)). CFP does address libraries, schools in pointing to the school districts' strategic plans.</p> <p>Completed: <input type="checkbox"/> Date:</p>
<p>c. Preliminary subdivision approvals under RCW 58.17.140 are valid for a period of five or seven years (previously five years). See also RCW 58.17.170</p> <p>Note: preliminary plat approval is valid for seven years if the date of preliminary plat approval is on or before December 31, 2014; five</p>	<p>Yes CCC 29.19.300</p>	<p>No</p>	<p>Completed: <input type="checkbox"/> Date:</p>

years if the preliminary plat approval is issued on or after January 1, 2015.	No	Yes		
d. Include in short plat regulations procedures for unit lot subdivisions allowing division of a parent lot into separately owned unit lots. RCW 58.17.060(3) , new in 2023 by SB 5258 - section 11			The County will need to add provisions to CCC 29 allowing division of a parent lot into separately owned unit lots in short subdivisions. See new standards under 33.50.010(9), 33.50.030(5). Land Division Code will be updated as part of the 2026 work plan.	Completed: <input checked="" type="checkbox"/> Date: 10/4/2025
Stormwater				
	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
a. Regulations protect water quality and implement actions to mitigate or cleanse drainage, flooding, and storm water run-off that pollute waters of the state, including Puget Sound or waters entering Puget Sound. RCW 36.70A.070(1) Regulations may include: adoption of a stormwater manual consistent with Ecology's latest manual for Eastern or Western Washington, adoption of a clearing and grading ordinance - See Commerce's 2005 Technical Guidance Document for Clearing and Grading in Western Washington . Adoption of a low impact development ordinance. See Puget Sound Partnership's 2012 Low Impact Development guidance and Ecology's 2013 Eastern Washington Low Impact Development guidance .	Yes, CCC 27.14	No	Current adopted stormwater code meets statute. LID ordinances may be updated during this update.	Completed: <input type="checkbox"/> Date:

<p>Additional Resources: Federal Grants to Protect Puget Sound Watersheds, Building Cities in the Rain, Ecology Stormwater Manuals, Puget Sound Partnership Action Agenda</p>				
<p>b. Provisions for corrective action for failing septic systems that pollute waters of the state. RCW 36.70A.070(1). See also: DOH Wastewater Management, Ecology On-Site Sewage System Projects & Funding</p>	<p>Yes, CCC 27.14.120 and CCC 33.59</p>	<p>No</p>	<p>Septic discharges classified as "Pollutant" under CCC 27.14.040. This code section may be updated to include specificity for waters of the state.</p>	<p>Completed: <input type="checkbox"/> Date:</p>

Organic Materials Management Facilities

New in 2022, HB 1799 added a section to the GMA aimed at reducing the volumes of organic materials collected in conjunction with other solid waste and delivered to landfills, supporting productive uses of organic material wastes and reduction of methane gas (a greenhouse gas).

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>New section <u>RCW 36.70A.142</u>; new in 2022 legislation <u>HB 1799</u>: Development regulations newly developed, updated, or amended after January 1, 2025 allow for the siting of organic materials (OM) management facilities as identified in local solid waste management plans (SWMP) to meet OM reduction and diversion goals. Siting to meet criteria described in <u>RCW 70A.205.040(3)</u></p> <p>See also <u>RCW 36.70.330</u>. For applicability, see <u>RCW 70A.205.540</u></p>	<p>Yes, CCC 33.40.070</p>	<p>Yes</p>	<p>Siting of solid waste disposal facilities are allowed as a conditional use in the Commercial Forest zone. May need to be updated to criteria mentioned in statute. Sew new definition 33.03010(77), and OMMF's as allowed uses under 33.17.010 and 33.17.020.</p> <p>Completed: <input checked="" type="checkbox"/> Date: 12/12/2025</p>
Impact Fees			
<p>May impose impact fees on development activity as part of the financing for public facilities, provided that the financing for system improvements to serve new development must provide for a balance between impact fees and other sources of public funds; cannot rely solely on impact fees.</p>			
<p>a. If adopted, impact fees are applied consistent with <u>RCW 82.02.050</u> amended in 2015, <u>RCW 82.02.060</u> amended in 2023 by <u>SB 5258, 070, 080, 090</u> amended in 2018 and <u>100</u>. <u>WAC 365-196-850</u> provides guidance on how impact fees should be implemented and spent.</p>	<p>Not applicable. Per CCC 31.02.810, no impact fees exist.</p>	<p>No</p>	<p>"The funding to make this Plan work includes the second one-quarter percent local real estate excise tax as allowed under Chapter 82.46 RCW. This revenue source would be in lieu of development impact fees." This may be updated under the 2025 periodic update.</p> <p>Completed: <input type="checkbox"/> Date:</p>
<p>b. Jurisdictions collecting impact fees must adopt and maintain a system for the deferred collection of impact fees for single-family detached and attached residential construction, consistent with <u>RCW 82.02.050(3)</u> amended in 2016</p>	<p>Not applicable. Per CCC 31.02.810, no impact fees exist.</p>	<p>No</p>	<p>Completed: <input type="checkbox"/> Date:</p>

<p>c. If adopted, limitations on impact fees for early learning facilities. RCW 82.02.060 amended in 2021</p>	<p>Not applicable. Per CCC 31.02.810, no impact fees exist.</p>	<p>No</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>d. If adopted, exemption of impact fees for low-income and emergency housing development. RCW 82.02.060 amended in 2023. See also definition change in RCW 82.02.090(1)(b) amended in 2018</p>	<p>In Current Regs? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>
<p>e. Ensure impact fees are not assessed on the construction of accessory dwelling units that are greater than 50 percent (50%) of the impact fees that would be imposed on the principal unit. RCW 36.70A.681 new in 2023 by HB 1337</p>	<p>Not applicable. Per CCC 31.02.810, no impact fees exist.</p>	<p>No</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>f. The schedule of impact fees reflects the proportionate impact of new housing units, including multifamily and condominium units, based on the square footage, number of bedrooms, or trips generated, in the housing unit in order to produce a proportionally lower impact fee for smaller housing units. RCW 82.02.060 amended in 2023 by SB 5258</p>	<p>Not applicable. Per CCC 31.02.810, no impact fees exist.</p>	<p>No</p>	<p>Completed: <input type="checkbox"/> Date:</p>

Concurrency and Transportation Demand Management (TDM)

Ensures consistency in land use approval and the development of adequate public facilities as plans are implemented, maximizes the efficiency of existing transportation systems, limits the impacts of traffic and reduces pollution.

In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
<p>a. The transportation concurrency requirement includes specific language that prohibits development when level of service standards for transportation facilities cannot be met. RCW 36.70A.070(6)(b) amended in 2023, WAC 365-196-840.</p> <p>Note: Concurrency is required for transportation, but may also be applied to park facilities, etc.</p>	Possibly	Current regulations include other methods of meeting concurrency cannot be met due to a new development. May need to be updated to meet current statute. See new policy 31.02.420(6)(e) and amended policy 31.02.420(7).	Completed: <input type="checkbox"/> Date: 11/12/2025
<p>b. Measures exist to bring into compliance locally owned transportation facilities or services that are below the levels of service established in the comprehensive plan. RCW 36.70A.070(6)(a)(iii)(B) and (D). RCW 36.70A.070(6)(b), amended in 2023</p> <p>Levels of service can be established for automobiles, pedestrians and bicycles. See WAC 365-196-840(3) on establishing an appropriate level of service.</p>	No		Completed: <input type="checkbox"/> Date:
<p>c. Highways of statewide significance (HSS) are exempt from the concurrency ordinance. RCW 36.70A.070(6)(a)(iii)(C)</p>	No	Highways not listed under concurrency definition in 31.02.410(1).	Completed: <input type="checkbox"/> Date:
<p>d. Traffic demand management (TDM) requirements are consistent with the comprehensive plan. RCW 36.70A.070(6)(a)(vi)</p> <p>Examples may include requiring new development to be oriented towards transit streets, pedestrian-oriented site and building design, and requiring bicycle and pedestrian connections to street and trail networks. WAC 365-196-840(4) recommends adopting methodologies that analyze the transportation</p>	Yes	Regulations that list specific TDM strategies as requirements may be needed. Currently TDM strategies are encouraged.	Completed: <input type="checkbox"/> Date:

system from a comprehensive, multimodal perspective.			
e. If required by RCW 82.70 , a commute trip reduction (CTR) ordinance to achieve reductions in the proportion of single-occupant vehicle commute trips has been adopted. The ordinance should be consistent with comprehensive plan policies for CTR and Department of Transportation rules.	Changes needed to meet current statute? Yes/No	In Current Regs? Yes/No If yes, cite section	Notes County does not provide financial incentives to employees who ride share, car share, or use public transportation. Completed: <input type="checkbox"/> Date:

Tribal Participation in Planning

New in 2022 (see HB 1717). A federally recognized Indian tribe may voluntarily choose (opt-in) to participate in the county or regional planning process. See Commerce's new [Tribal Planning Coordination for GMA](#) webpage for guidance and staff contacts.

a. Mutually agreeable memorandum of agreement between local governments and tribes in regard to collaboration and participation in the planning process unless otherwise agreed at the end of a mediation period. RCW 36.70A.040(8)(a) new in 2022	No	No	HB 1717 requirements will need to be demonstrated in the updated plan. The planning process includes an engagement plan that builds in tribal collaboration and participation. Conducted extensive outreach with all five area Tribes. No request for memorandum of agreement was received. All comments have been considered and integrated where appropriate. Response of actions taken have been provided to participating Tribes. Completed: <input type="checkbox"/> Date:
b. Policies consistent with countywide planning policies that address the protection of tribal cultural resources in collaboration with federally recognized Indian tribes that are invited, provided that a tribe, or more than one tribe, chooses to participate in the process. RCW 36.70A.210(3)(i) new in 2022	Yes, CCC 31.02.120(5), 31.02.140(10), 31.02.140(22),	No	Completed: <input type="checkbox"/> Date:

Regulations to Implement Optional Elements

<p>a. New fully contained communities are consistent with comprehensive plan policies, RCW 36.70A.350 and WAC 365-196-345</p>	<p>Yes CCC 31.05.270(2)</p>	<p>No</p>	<p>Comprehensive Plan adopts GMA Regulations.</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>b. If applicable, master planned resorts are consistent with comprehensive plan policies, RCW 36.70A.360, RCW 36.70A.362 and WAC 365-196-460</p>	<p>Yes, CCC 33.25.050(2)(a) and CCC 31.02.270</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
	<p>In Current Regs? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>	
<p>c. If applicable, major industrial developments and master planned locations outside of UGAs are consistent with comprehensive plan policies, RCW 36.70A.365, RCW 36.70A.367 and WAC 365-196-465</p>	<p>Yes, CCC 31.02.275</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>d. Regulations include procedures to identify, preserve, and/or monitor historical or archaeological resources. RCW 36.70A.020(13), WAC 365-196-450</p>	<p>Yes, CCC 35.25.170, and CCC 31.02.330</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>e. Other development regulations needed to implement comprehensive plan policies such as energy, sustainability or design are adopted. WAC 365-196-445</p>	<p>Yes</p>	<p>No</p>	<p>Will be reviewed during periodic update process to ensure consistency with new comprehensive plan policies.</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>f. Design guidelines for new development are clear and easy to understand; administration procedures are clear and defensible.</p>	<p>Yes</p>	<p>No</p>	<p>Will be reviewed during periodic update process to ensure consistency with new comprehensive plan policies.</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>g. Local design review includes one or more ascertainable guideline, standard or criterion by which an applicant can determine whether a given building design is permissible under that development regulation. May not result in a reduction in density, height, bulk or scale below the generally applicable development regulations for a development proposal in the applicable zone.</p>	<p>Not applicable</p>	<p>No</p>	<p>Clallam County does not currently have a design review process. This may be revisited during the periodic update process.</p>	<p>Completed: <input type="checkbox"/> Date:</p>

Project Review Procedures

In 2023, SB 5290 substantially amended local permit review processes. Codification and additional resources from Commerce are forthcoming.

	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes
<p>Project review processes integrate permit and environmental review. RCW 36.70A.470, RCW 36.70B and RCW 43.21C.</p> <p>Resources include WAC 365-196-845, WAC 197-11 (SEPA Rules), WAC 365-197 (Project Consistency Rule, Commerce, 2001) and Ecology SEPA Handbook.</p> <p>Integrated permit and environmental review procedures for:</p> <ul style="list-style-type: none"> • Notice of application • Notice of complete application • One open-record public hearing • Combining public hearings & decisions for multiple permits • Notice of decision • One closed-record appeal 	<p>Yes CCC 26.10.340(3) and 26.10.350</p>	<p>No</p>	<p>Completed: <input type="checkbox"/> Date:</p>

Plan & Regulation Amendments

If procedures governing comprehensive plan amendments are part of the code, then assure the following are true:

<p>a. Regulations limit amendments to the comprehensive plan to once a year (with statutory</p>	<p>Yes, CCC 31.08.300</p>	<p>No</p>	<p>Completed: <input type="checkbox"/> Date:</p>
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<p>UGA; creates or expands a LAMIRD; establishes a new fully contained community; or creates or expands a master planned resort. The effective date is:</p> <ul style="list-style-type: none"> • 60 days after the date of public notice of adoption of the comprehensive plan, development regulation or amendment to the plan or regulation, implementing the action as provided in RCW 36.70A.290(2); or • If a petition for review to the Growth Management Hearings Board is timely filed, upon the issuance of the Board's final order. <p>RCW 36.70A.06Z, new in 2022</p>			<p>shall be treated as a comprehensive plan amendment per CCC 31.02.250(1)(a) and 31.02.263(4)(f). See amended section 31.08.430.</p>
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Appendix A: Element updates per HB 1181 - Climate Change and Resiliency

Required Updates to GMA Elements per HB 1181						
GMA Periodic Update Due Dates	Greenhouse Gas Reduction Sub-element	Climate Resilience Sub-element	Transportation Element	Land Use Element	Due in 2034	
					Capital Facilities Element*	Utilities Element*
For jurisdictions with a 2024 deadline and subject to GHG Emissions Reduction [Sec. 15 (10)]	Due 2029	Due 2029	Due 2029			
For jurisdictions with a 2025 & 2026 deadline and subject to GHG Emissions Reduction [Sec. 4 (1) and (2)]	X	X	X	X	X*	X*
Jurisdictions not subject to GHG Emissions Reduction (all years) [Sec. 4 (3) and 9(e)(1)]	Optional	X See RCW 36.70A.070(9)(e)	**	Only countries over 20k pop.	X*	X*

Table notes: "X" indicates a GMA update requirement. One asterisk (*) indicates jurisdictions should make a good faith effort to update their elements to be consistent; refer to HB 1181 (Chapter 228, Laws of 2023) for specifics. Two asterisks (**) indicates 22 cities that need to update their transportation element based on population, not whether or not their county is among those that must develop a GHG emissions element.

CPU Policy Response Table 4: Commerce Checklist

Clallam County Comprehensive Plan Update Commerce Checklist, Items still requiring policy revisions

The following items are included in the Commerce Checklist prepared by Facet Consulting for Clallam County's Comprehensive Plan Update. The Checklist identifies specific requirements of the GMA and whether those requirements are, or have been, included in the CPU. The items below represent those requirements that still require changes.

Requirement	Policy for Amendment/New Policy
<p>1) Section 1, p. 7, Compliance with RCW 36.70A.177(3), allowance of ag accessory uses while ensuring they do not . Policies limiting ag accessory uses.</p>	<p>NOTE: Ch. 33.48 already implements standards per 36.70A.177(3). Recommend new policy Section 31.02.115(3)(c): <u>"Agricultural Accessory Uses. Clallam County supports the inclusion of agricultural accessory uses that assist local farms to maintain profitability and sustainability. Uses that assist with storage, distribution and marketing of locally produced agricultural products, including support services that facilitate these activities, will be allowed within agricultural operations. Non-agricultural accessory uses and activities that are related to and consistent with the size, scale and intensity of the existing agricultural use, that also support the economic viability of the agricultural operation, including new buildings, parking, and supportive uses, will be allowed within the intensively developed portion of the agricultural property and shall not otherwise convert more than one acre of agricultural land to nonagricultural uses, and shall be focused on the least agriculturally productive portion of the property."</u></p>
<p>2) Section 1, p. 9, inclusion of "Best Available Science" for the protection of critical areas.</p>	<p>Recommend amendment to 31.02.340(1)(a): <u>"Best conventional technology-available science shall be used to prevent or treat the environmental impacts of conventional pollutants."</u> Recommend amendment to second sentence 31.02.340(1)(c): <u>"The ordinances shall be amended as necessary to implement watershed or</u></p>

CPU Policy Response Table 4: Commerce Checklist

<p>3) Section 1, p. 10. Per RCW 36.70A.142, allow for the siting of organic materials management facilities (composting) within industrial zones.</p>	<p>special area studies, <u>maintain consistency with best available science (BAS)</u>, and to maintain consistency with the Comprehensive Plan.”</p> <p>Recommend amending 33.17.010(1) and .020(1) to allow <u>organic materials management facilities</u>, outright.</p> <p>Recommend new definition 33.03.010(77): <u>“Organic materials management facility” means a location and related improvements where organic waste, such as food scraps, yard trimmings or other organic materials that do not contain pesticides, pests, or other forms of chemical or biological contamination, is processed into new products like compost or energy, through composting, anaerobic digestion, vermiculture, black soldier fly, or similar technologies.”</u></p>
<p>4) Housing Element, p. 11. Strengthen language that reflects requirements of RCW 36.70A.070(2)(b), regarding duplex, triplex and townhomes, and housing in proximity to employment locations. Also, additional language to incorporate requirements of .070(2)(d) regarding adequate provisions for affordable housing.</p>	<p>Recommend amending 31.02.281(1): <u>Policy 1. “Urban growth areas shall be adequately sized to guard against negative market fluctuations attributed to artificially tight land supply and shall promote a variety of housing types, including multifamily, single-family, duplexes, triplexes, townhomes, mixed uses, affordable housing, emergency housing, emergency shelters, permanent supportive housing, and accessory living units. Consideration should also be given to locating housing in proximity to employment centers.”</u></p> <p>Recommend new section 31.02.281(2): <u>“Policy 2. Development regulations within urban growth areas should focus on adequate provisions for affordable housing opportunities, especially for moderate, low, very low, and extremely low-income segments. In addition to the efforts of the Homelessness Task Force (CCC 31.02.280(3)(c)) and the adjustments to land use designed to accommodate income segment growth targets (CCC 31.02.280(3)(a)), measures should be developed to avoid displacement of existing low, very low, and extremely low-income households as local communities develop and improve, resulting in a commensurate increase in property values. Assistance programs</u></p>

CPU Policy Response Table 4: Commerce Checklist

<p>5) g. Identification of areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments.</p> <p>RCW 36.70A.070(2)(g) new in 2021 Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing. RCW 36.70A.070(2)(h) new in 2021.</p> <p>See also: Support Materials for Racially Disparate Impacts, Exclusion and Displacement Work</p>	<p><u>and continued monitoring should be established to evaluate and respond to avoid active displacement.</u>"</p> <p>Working with Consultants to provide a recommendation.</p>
<p>6) Capital Facilities Plan Element, p. 14. Address the potential for displacement impacts resulting from growth following infrastructure investments.</p>	<p>Recommend new policy 31.02.320(3): <u>"Infrastructure investments and service extensions should be planned equitably and measures to address potential displacement impacts should be implemented concurrently or upon economic signals of displacement potential."</u></p>
<p>7) e. A forecast of multimodal transportation for a minimum of 10 years including land use assumptions used in estimating travel. RCW 36.70A.070(6)(a)(i), RCW 36.70A.070 (6)(a)(iii)(E) amended in 2023, WAC 365-196- 430(2)(f)</p>	<p>[Methods from KH will be provided by Facet]</p>
<p>8) Capital Facilities Plan Element, p. 15. A policy establishing the requirement to</p>	<p>Recommend amending 31.02.320(5): <u>"Policy 65. Prepare a six (6) year financial plan for any public facilities which need to be developed as a</u></p>

CPU Policy Response Table 4: Commerce Checklist

<p>reassess the land use element if probable funding falls short of meeting existing needs and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent.</p>	<p>result of LOS requirements and projected changes in population. <u>Should funds fall short of meeting existing needs, the land use element should be reassessed to ensure the Capital Facilities Plan, finance plan and land use element are coordinated and consistent.</u> The six (6) year financial plan should be based on cost estimates for capital improvements which are identified in the plan. See Capital Facilities Plan (<u>Appendix I</u>) for detailed financing plan.”</p>
<p>9) Utilities Element, p. 15. Identify City of Port Angeles as electric purveyor within City limits.</p>	<p>Recommend amending first sentence at top of p. 21, CFP: “Clallam County’s Public Utility District (PUD) provides all electrical service to the county, with the exception of a portion of the City of Port Angeles, <u>which is administered by City of Port Angeles Light Operations.</u>”</p>
<p>10) Transportation Element, p. 17. Forecast multimodal transportation for a minimum of 10 years, including land use assumptions used in estimating travel (RCW 36.70A.070(6)(a)(iii)(E)).</p>	<p>Recommend new paragraph 3, 31.02.425: <u>“A forecast study of current and future (20-year) multimodal transportation demand was conducted for key arterial intersections within the Sequim Urban Growth Area in 2025, by Kimley-Horn Engineering Consultants. The locations were selected to anticipate future growth and related transportation because of land use changes contemplated within the Housing Element and Comprehensive Plan Land Use Map within the unincorporated Sequim Urban Growth Area. The study was also coordinated with growth projected from land use choices being considered by the City of Sequim. The study concluded that, with projected growth and related traffic and non-motorized transportation demand, the intersections demonstrated adequate levels of service (LOS) over the projected 20-year planning horizon (see Exhibit L). additional analysis was not completed elsewhere as the City of Sequim UGA is the only location within Clallam County that proposed density changes and any significant expectation of corresponding changes in development patterns.</u>”</p>
<p>11) g. A transition plan for transportation as required in Title II of ADA. Perform self-evaluations of current facilities and develop a program access</p>	<p>Recommend new section 31.02.420(1)(e)(vii): <u>“In accordance with RCW 36.70A.070(6)(a)(iii)(G), the County should perform an inventory and self-evaluation of current facilities relative to accessibility requirements</u></p>

CPU Policy Response Table 4: Commerce Checklist

<p>plan to address deficiencies and achieve the identification of physical obstacles, establish methods, perform modifications and identify leadership roles. RCW 36.70A.070(6)(a)(iii)(G) new in 2023</p>	<p><u>of the Americans with Disabilities Act of 1990 (ADA). Based on that information, the County should develop a Transition Plan to address that identified deficiencies, including identification of physical obstacles that limit the accessibility of facilities to individuals with disabilities, describe the methods to be used to make the facilities accessible, provide a schedule for making the access modifications, and identify the public officials responsible for implementation of the Transition Plan.”</u></p>
<p>12) h. An active transportation component to include collaborative efforts to identify and designate planned improvements for active transportation facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles. RCW 36.70A.070(6)(a)(vii) amended in 2023, WAC 365-196-430(2)(j).</p>	<p>Working with Consultants to provide a recommendation.</p>
<p>13) l. If probable funding falls short of meeting identified needs of the transportation system, including state transportation facilities, a discussion of how additional funds will be raised, or how land use assumptions will be reassessed to ensure that LOS standards will be met. RCW 36.70A.070(6)(a)(iv)(C) amended in 2023, WAC 365-196-430(2)(l)(iii).</p>	<p>Recommend amending 31.02.420(6)(e): “Coordinate federal, State, and private funding. The Six-Year Transportation Improvement Plan (TIP) and the County’s Capital Improvement Plan (CIP) will be utilized to coordinate these funding sources and prioritize capital expenditures according to the adopted levels of service and community priorities. Where probable funding sources identified fall short of meeting the identified needs of the transportation system, including state transportation facilities, the Board of County Commissioners will consider alternative funding sources and mechanisms, including but not limited to grant opportunities, local road improvement districts (RIDs), and General Fund allocation. In the event that adequate funding sources are not available, consideration should be given to reassessing the land use assumptions and making appropriate changes to ensure that LOS standards will be met in accordance with RCW 36.70A.070(6)(a)(iv)(C).”</p>

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<p>14) Essential Public Facilities, p. 23. Need to incorporate "reentry and rehabilitation facilities" as part of EPFs, per RCW 36.70A.200.</p>	<p>Recommend amending 31.02.050(17): "Essential public facilities" means facilities that are typically difficult to site, such as airports, State education facilities, and State or regional transportation facilities as defined in RCW 47.06.140, State and local correctional facilities, solid waste handling facilities, <u>reentry and rehabilitation facilities</u>, opioid treatment programs including both mobile and fixed-site medication units, recovery residences, harm reduction programs excluding safe injection sites, and in-patient facilities including substance abuse facilities, mental health facilities, group homes, and secure community transition facilities as defined in RCW <u>71.09.020</u>."</p>
<p>15) Economic Development, p. 26. Need to update population data under Economic Development Issues.</p>	<p>Recommend amending 31.02.610(1): "Population. As of 202405, the Forecasting Division of the Washington State Office of Financial Management (OFM) estimated Clallam County's population (including incorporated areas) at 78,55066,800, which is approximately a 1.8feuf percent increase (0.45one percent annualized rate) from the Census population of 77,15564,179 in 20200 and approximately 2248 percent increase (1-20.9 percent annualized rate) from the Census population of 64,17956,464 in 20001990. According to the OFM, the majority of population increase has been due to in-migration. In 2002, OFM utilizing the Department of Commerce's medium projection modelling, projections estimated that Clallam County's resident population is likely to would increase to as much as 72,38386,700 by 204510 and 81,894 by 2020."</p>
<p>16) a. All plan elements must be consistent with relevant county-wide planning policies (CWPPs) and, where applicable, multi-county planning policies (MPPs) and the GMA. RCW 36.70A.100 and 210, WAC 365-196-305; 400(2)(c); 510 and 520.</p>	<p>Recommend amending 31.02.100(1): "Clallam County shall work with local jurisdictions within the county to ensure relevant county-wide planning policies are integrated into the local planning process, and ensure local goals and policies are consistent. <u>(a) The Clallam Countywide Planning Policies (CCPP) were amended on December 2, 2018.</u> <u>(b) As part of the Comprehensive Plan Update review, the CCPP were reviewed for compliance with RCW 36.70A.210 and found to be in substantial compliance with the requirements of the Act.</u></p>

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	<p><u>(c) Representatives from the County and its municipal jurisdictions met on several occasions as part of the Comprehensive Plan update to discuss growth allocations, land use, and other elements as required throughout the CCPP.</u></p> <p><u>(d) The CCPP should be reviewed every five years to reflect local market conditions concerning urban growth area designations, urban services, capital facilities, transportation, housing market needs, economic development, tribal and cultural resources, and continued adequacy for creating a framework for coordination on growth management.</u></p>
<p>17) b. All plan elements must be consistent with each other. RCW 36.70A.070 (preamble) and WAC 365- 197-040.</p>	<p>The Plans have been reviewed for internal consistency pursuant to RCW 36.70A.070. With minor adjustments, no substantive inconsistencies are known to exist.</p>
<p>18) c. The plan must be coordinated with the plans of adjacent jurisdictions. RCW 36.70A.100 and WAC 365-196-520.</p>	<p>Upon completion of Commerce 60-day review draft, notice will be provided to Jefferson County. The Climate Vulnerability Assessment was modified to incorporate the Hoh Indian Tribe (Jefferson County) as Clallam County and the City of Forks represent the closest emergency responders available.</p>
<p>19) Zoning Code, p. 32. Per RCW 36.70A.450, the County is barred from prohibiting family daycare facilities (12 kids or less) from operating from an individuals home within residential or commercial zones. The use is allowed outright, but is conditional in the DPA zone, and prohibited in the RLC, TR, UNC and URC Zones.</p>	<p>Recommend amending Sections 33.15.035, .060, .067, .070, and .080, to list <i>Family Daycare Provider</i> as permitted outright.</p>
<p>20) Zoning Code, p. 33. Per RCW 36.70A.410, the County is barred from treating a residential structure occupied by</p>	<p>Recommend amending Table 33.19.040(A) and Table 33.20.040(A) by removing reference to "Group homes..." which will remove treating such units differently from other residential units.</p>

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<p>individuals with handicaps any differently than a similar structure occupied by a family or other unrelated individuals.</p>	
<p>21) h. Limitations on regulating: outdoor encampments, safe parking efforts, indoor overnight shelters and temporary small houses on property owned or controlled by a religious organization. RCW 36.01.290 amended in 2020, RCW 35.21.915 amended in 2020.</p>	<p><u>Recommend new section 31.02.283(3)(m): "In accordance with RCW 36.01.290, Clallam County will not prohibit temporary housing, safe parking, or other temporary overnight accommodations on land owned by a religious organization. Clallam County may consider reasonable provisions for life-safety, sanitation, or other critical standards, provided said standards do not conflict with RCW 36.01.290 or RCW 35.21.915."</u></p>
<p>22) Resource Lands, p. 37. Pursuant to RCW 36.70A.060(1)(b), Counties are required to provide notice to permittees for activities within 500 feet of designated resource lands (Forest, agriculture, and mineral lands). CCC 29.20.300(26) requires plat notes for any subdivision within 600 feet of designated resource zoning. No notice is currently required for building or other development permits.</p>	<p><u>Recommend new section 33.40.110:</u></p> <p><u>"Notice of Proximity to Resource Zone.</u></p> <p><u>All building permits or other development permits issued by the Department of Community Development for activities occurring within 500 feet of lands designated as Agricultural Retention (AR), Commercial Forest (CF), Commercial Forest/Mixed Use 20 (CFM20), Commercial Forest/Mixed Use 5 (CFM5), or Mineral Resource Land Overlay, shall be provided a written notice on or accompanying the final permit that contains the following language:</u></p> <p><u>This development activity is within five hundred (500) feet of property zoned for forestry, agricultural purposes or as a designated mining site. You may be subject to inconveniences or discomforts arising from such operations, INCLUDING BUT NOT LIMITED TO NOISE, TREE REMOVAL, ODORS, INSECTS, FUMES, DUST, SMOKE, THE OPERATION OF MACHINERY OF ANY KIND DURING ANY 24 HOUR PERIOD (INCLUDING AIRCRAFT), THE STORAGE AND DISPOSAL OF MANURE, AND THE APPLICATION BY SPRAYING OR OTHERWISE OF CHEMICAL FERTILIZERS, SOIL AMENDMENTS, HERBICIDES AND PESTICIDES. Clallam County has determined that</u></p>

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	<p><u>the use of real property for forestry, mining or agricultural operations is a high priority and favored use to the County and those inconveniences or discomforts arising from these operations, if such operations are consistent with commonly accepted best management practices and comply with local, State and Federal laws. However, those activities which are not related to normal forestry, mining, or agricultural operations, or which do not follow accepted best management practices, are not protected under these provisions and will be considered a nuisance."</u></p>
<p>23) e. Designate mineral lands and associated regulations as required by RCW 36.70A.131 and WAC 365-190-040(5). For more information review the WA State Dept. of Natural Resources (DNR)'s Geology Division site</p>	<p>Working with Consultants to provide a recommendation.</p>
<p>24) d. Include in short plat regulations procedures for unit lot subdivisions allowing division of a parent lot into separately owned unit lots. RCW 58.17.060(3) new in 2023 by SB 5258 - section 11</p>	<p>Working with Consultants to provide a recommendation.</p>
<p>25) Concurrency and Transportation Demand Management, p. 43. Should strengthen language to ensure new development compensates for impacts to the transportation system, particularly of LOS drops below acceptable levels as required under RCW 36.70A.070(6)(b).</p>	<p>Recommend amending 31.02.420(7): "<u>Mitigation. (Policy 31) Clallam County should require new development to mitigate impacts on transportation facilities which are insufficient to safely handle transportation demands. The County should develop strategies to require new development to rectify and/or compensate for impacts to transportation facilities not meeting minimum safety standards, or when currently adopted levels of service (LOS) are diminished below acceptable levels, when reasonable and capable of being accomplished. These strategies may include active transportation facility improvements, increased or enhanced public transportation service, ride-sharing programs, demand management, and other</u></p>

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<p>26) d. Traffic demand management (TDM) requirements are consistent with the comprehensive plan. RCW 36.70A.070(6)(a)(vi) Examples may include requiring new development to be oriented towards transit streets, pedestrian-oriented site and building design, and requiring bicycle and pedestrian connections to street and trail networks. WAC 365-196-840(4) recommends adopting methodologies that analyze the transportation system from a comprehensive, multimodal perspective.</p>	<p><u>transportation systems management strategies funded by the development.</u>"</p> <p>Working with Consultants to provide a recommendation.</p>
<p>27) b. Regulations define emergency for an emergency plan amendment. RCW 36.70A.130(2)(b) and WAC 365-196-640(4)</p>	<p>Recommend amending 31.08.300, Paragraph 1: "The purpose of this section is to establish procedures and timelines for amending the Comprehensive Plan, including text and maps, through the annual Comprehensive Plan review process, as an emergency amendment, or as a minor amendment. The Growth Management Act (Chapter 36.70A RCW) generally allows amendments to comprehensive plans, comprehensive plan maps and associated development regulations only once per year, except in emergencies <u>as set forth under RCW 36.70A.130(2)(b)</u>, in order to allow communities to consider the cumulative impacts of the proposed revisions..."</p>
<p>28) Plan and Regulation Amendments, p. 47. Pursuant to RCW 36.70A.290(2)(b), the effective date of an amended Comprehensive Plan or development regulation must be 60-days following adoption.</p>	<p>Recommend amending 31.08.430: "Effective Date. This Plan is necessary for the preservation of the public health, safety and general welfare of the people of Clallam County, and shall take effect 460 days following adoption <u>and publication of notice of adoption</u> by the Clallam County Board of Commissioners."</p>

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CPU Policy Response Table 3: Public/Agency Testimony

Clallam County Comprehensive Plan Update Summary of Public Testimony and Corresponding Recommendations as of December 24, 2025.

The following summarizes public testimony received as of the opening of the Public Hearing for the Comprehensive Plan Update (CPU) before the Planning Commission (November 5, 2025). Also included are corresponding policy recommendations, where appropriate for consideration by the Planning Commission. All written and/or recorded testimony will be retained as part of the record for the CPU.

Summary of Testimony Received	Recommended Policy/Response
<p>1.a) Clallam County Public Works, Suggestions regarding policy responses to public comment, 11/5/2025. Suggested edits concerning Public Comment #1, CCC 31.02.420(1)(c)(ii).</p>	<p>Recommended Policy, Public Comment #1: CCC 31.02.420(1)(c)(ii). Review need for new or alternative highway alignment to improve circulation and regional mobility in the Port Angeles subregion. Observe and track potential regional congestion points along the SR 101 corridor throughout Clallam County, and plan for new highway corridors and bypass alternatives as needed to address congestion and maintain arterial flow and efficient regional mobility.</p> <p>Suggested Language: <u>“Proactively communicate and coordinate with the Washington State Department of Transportation to identify and plan for US 101 Highway corridor improvements, new alignments, and bypass routes needed to improve circulation, address congestion, and maintain arterial flow and efficient regional mobility throughout the county.”</u></p> <p>Additional staff Recommendation: Include <u>“provide resilience”</u> in the objectives of this section for internal consistency with CCC 31.02.820.</p>
<p>1.b) Clallam County Public Works, Suggestions regarding policy responses to public comment, 11/5/2025. Suggested edits concerning Public Comment #2, CCC 31.02.420(1)(c)(iii). In their comment, it was noted that the recommended policy change is</p>	<p>Recommended Policy, Public Comment #2: CCC 31.02.420(1)(c)(iii). Pursue the development of a new highway connection from Neah Bay to Ozette along or near the coast.</p>

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<p>consistent with the 6-Year TIP that includes a project for a "Preliminary Study for Neah Bay to Forks Road."</p>	<p><u>Suggested Language: "Assess options and feasibility of alternative/emergency access routes for the SR 112 north coast area, including an alternative route from Neah Bay to Forks."</u></p>
<p>1.c) Clallam County Public Works, Suggestions regarding policy responses to public comment, 11/5/2025. Comments included context that the North Olympic Peninsula Lead Entity (NOPE) and the North Pacific Coast Lead Entity (NPCLE) have a process for prioritizing fish habitat improvement projects, including culvert replacements. The proposed language recognizes and incorporates this effort.</p>	<p><u>Recommend Policy, Public Comment #49, CCC 31.02.340(1)(f): Clallam County shall prioritize culvert replacement and similar issues that presently result in barriers to fish passage as part of the Six-Year Transportation Improvement Plan (TIP) process.</u></p> <p><u>Suggested language: "Consider culvert replacement for fish passage improvements associated with Clallam County managed roads prioritized by the Lead Entities and that have secured funding or where potential finding (e.g., grants) has been identified. Additional considerations should include other benefits such as replacement of conveyance infrastructure that is undersized, damaged, or at or near approaching normal design lifespan."</u></p>
<p>2.a) Clallam County Public Works, Suggestions regarding policy responses to public comment, 11/6/2025. Application should be limited to local access roads. State and federal standards applies to collectors and arterials. Using "considered" allows for decision process under 6-Year TIP.</p>	<p><u>Recommended Policy, Planning Commission Recommendation # 6, CCC 31.02.420(1)(a)(vi): "For local access roads where there exists a clear public benefit and local circumstances support, traffic calming techniques, such as raised crosswalks, variation in horizontal alignments, and other design features, should be considered <u>utilized</u> consistent with adopted AASHTO Guidelines for the implementation of such features; provided, said design standards do not conflict with locally-adopted design standards."</u></p>
<p>2.b) Clallam County Public Works, Suggestions regarding policy responses to public comment, 11/6/2025. Proposed changes in recognition that large equipment (dump trucks, etc.) are not yet available in electric power. Also, implementing change as a resiliency strategy first requires establishing</p>	<p><u>Consider new Section CCC 31.02.820(2)(c): "Although Clallam County is not required under House Bill 1181 to reduce greenhouse gas emissions, opportunities to take such measures would nevertheless be in the public interest and could improve resiliency. Therefore, with <u>following implementation of</u> increased resiliency in energy generation and transmission, the County should explore grant funding and other resources for the transition of the County's small <u>small</u> vehicle fleet</u></p>

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<p>local energy sources. Otherwise, it leaves the community vulnerable.</p>	<p>from gas/diesel-powered to electric-powered or other renewable energy sources, where feasible and practicable. The same should be pursued concerning gas-powered maintenance equipment.”</p>
<p>3) Emailed Testimony received from Ed Bowen, 11/5/25.</p>	<p>Requests retaining the PRC Vision Statement presently articulated under CCC 31.06.010. Staff agrees with approval of this request.</p>
<p>4.a) Washington Department of Fish and Wildlife, 11/5/2025. The Voluntary Stewardship Program (VSP) is a highly successful program that creates incentives and assistance through the Conservation District to increase protections for critical areas occurring on agricultural lands.</p> <p>Rejected by PC, 11/19/25.</p>	<p>Proposed edits to CCC 31.02.120(6). “Agricultural land users shall be encouraged to maintain water quality, protect fish and wildlife habitat consistent with commercial agriculture and prevent erosion of valuable agricultural soils. <u>To achieve this, Clallam County will pursue enrollment in the Voluntary Stewardship Program (VSP) in partnership with the Clallam Conservation District, to create a non-regulatory approach to protecting critical areas on agricultural lands.</u>”</p>
<p>4.b) Washington Department of Fish and Wildlife, 11/5/2025. The proposed change is consistent with tenants of the GMA. Note, “forest” was not stricken per comments as this appears to have been an error in the comment.</p>	<p>Proposed edits to CCC 31.02.140(1). “Retain and prevent conversion of <u>designated commercialsuitable</u> forest land in the County in commercial forest land use, because of general economic benefits to the people of the County derived from forests, including timber production and processing, watershed conservation, recreation, and fish and wildlife conservation.”</p>
<p>4.c) Washington Department of Fish and Wildlife, 11/5/2025. The comments accurately cite WAC 365-196-480(2)(e) as requiring analysis of commercial forest lands <i>on a countywide basis</i>.</p>	<p>Proposed edits to CCC 31.02.140(24). “Land designated as commercial forest shall remain in this classification unless a strong case can be made that the zoning could be changed without affecting the commercial viability of the surrounding forest land <u>on a countywide basis</u>. Zone change applications shall meet one of the following criteria.”</p>
<p>4.d) Washington Department of Fish and Wildlife, 11/5/2025. Changes intended to</p>	<p>Proposed edits to CCC 31.02.150(3). “Environmental impacts of mineral extraction can be substantial. Aggregate production temporarily</p>

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<p>better align with WAC 197-11-768, 365-190-080 and 365-196-830.</p>	<p>obliterates entire minesite ecosystems, but this loss can be <u>mitigated/minimized</u> with carefully sequenced reclamation. The effects of truck traffic can be a primary concern in designating construction aggregate mines. Damage to river beds can be another major impact of mining. Channel bar scalping can reduce the probability of flooding but can also change the river-bed morphology <u>and result in cascading ecological impacts harming fish populations and aquatic habitat functions</u>. Possible reduction of the quantity of groundwater is a concern in new mineral sites...”</p>
<p>4.e) Washington Department of Fish and Wildlife, 11/5/2025. Suggested language to improve clarity.</p>	<p>Proposed edits to CCC 31.02.2560(1)(d). “An <u>adequate</u> buffer is required <u>-adequate</u> to ensure that harvesting of timber or crops on adjacent resource lands is not precluded.”</p>
<p>4.f) Washington Department of Fish and Wildlife, 11/5/2025. Changes to align with WAC 365-190-080 and 365-196-830.</p>	<p>Proposed edits to CCC 31.02.2560(1)(h). “The master planned resort is consistent with development regulations of the County to protect critical areas <u>to ensure no net loss of ecological functions and values</u>.”</p>
<p>4.g) Washington Department of Fish and Wildlife, 11/5/2025. Implements full mitigation sequence per WAC 197-11-768.</p>	<p>Proposed edits to CCC 31.02.2560(1)(i). “On-site and off-site infrastructure impacts are fully considered and <u>follow the full mitigation sequence mitigated</u>.”</p>
<p>4.h) Washington Department of Fish and Wildlife, 11/5/2025. Reflects language and intent of WAC 365-190-080 and 365-196-830.</p>	<p>Proposed edits to CCC 31.02.340(1)(c). “The critical areas ordinance shall be utilized by Clallam County to help achieve environmental objectives <u>including no net loss of critical area function and values</u>, prevent environmental degradation, and to manage land use activities within the natural and intrinsic constraints of the landscape...”</p>
<p>4.i) Washington Department of Fish and Wildlife, 11/5/2025. Proposed language is internally consistent with prevention being less problematic than restoration.</p>	<p>Proposed edits to CCC 31.02.340(1)(e). “Clallam County shall work with other agencies, tribes and individuals to <u>prevent additional listing proactively protect populations</u> of fish, wildlife and plants under the Endangered Species Act through pro-active (rather than reactive)</p>

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	<p>planning and implementation of proper land use practices <u>and conservation measures.</u>"</p>
<p>4.j) Washington Department of Fish and Wildlife, 11/5/2025. Given the process identified earlier under Comment # 1.c, staff does not support this change.</p>	<p>Proposed edits to CCC 31.02.340(1)(f). "Clallam County shall prioritize <u>culvert replacement and similar issues that presently result in identifying and removing barriers to fish passage including undersized or degraded culverts</u> as part of the Six-Year Transportation Improvement Plan (TIP) process."</p> <p>Note, changes made pursuant of Testimony 1.c, above, captured the above recommended language with the inclusion of "degraded."</p>
<p>4.k) Washington Department of Fish and Wildlife, 11/5/2025. Proposed language that establishes consistency with CCC 35.20.270(4) and climate policies of CCC 31.02.820. Staff recommends Subsection (c) be amended to read: "<u>...locate and ensure the design of new development is conditioned to avoid...</u>" as a regulatory agency, Clallam County does not design a project, but ensures the project meets regulation.</p>	<p>Proposed edits to CCC 31.02.340(6).</p> <p>(a) <i>Policy 16.</i> "Clallam County <u>should will</u> work to <u>implement</u> achieve alternatives for sewage treatment plant discharges to marine waters.</p> <p>(b) <i>Policy 17.</i> Clallam County shall preserve the scenic, aesthetic and ecological qualities of the marine shorelines of Clallam County, in harmony with those uses which are deemed essential to the life <u>and safety</u> of its residents. Clallam County shall implement marine resource goals through the Clallam County Shoreline Master Program and/or critical areas ordinance, as now or hereafter amended.</p> <p><u>(c) (New Policy 18). Clallam County shall locate and design new development to avoid the need for future shoreline stabilization to the extent feasible.</u>"</p>
<p>4.l) Washington Department of Fish and Wildlife, 11/5/2025. Maintaining habitat connectedness is a substantial part of ecosystem health.</p>	<p>Proposed edits to CCC 31.02.340(7)(a). "Land use practices should protect <u>connect</u>, and enhance habitat corridors, diversity and richness, and ensure protection <u>and connection</u> of wildlife corridors and habitat for threatened and endangered species. Wildlife corridors and riparian</p>

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<p>4.m) Washington Department of Fish and Wildlife, 11/5/2025. Amend 31.02.340(9)(a) to limit development in flood hazard areas, preserve ecological functions and maintain public access.</p>	<p>areas should be maintained as important community infrastructure <u>and to promote wildlife diversity across connected landscapes.</u>"</p> <p>Proposed edits to CCC 31.02.340(9)(a). "Flood control should be undertaken in the context of varied uses including agricultural and residential, fish and wildlife habitat, water supply, open space, and recreation. Land use and related regulations and zoning should reflect the natural constraints of floodplains, meander zones, and riparian habitat zones <u>and limit development within these areas.</u> Flood control measures should <u>reserve preserve ecological and community benefits such as floodplain functions and public access opportunities to the fullest extent possible opportunities for other uses, including public access.</u>"</p>
<p>4.n) Washington Department of Fish and Wildlife, 11/5/2025. Avoidance of impacts are preferable to minimizing or mitigating impacts.</p>	<p>Proposed edits to CCC 31.03.195(5)(b). "<u>Avoid and Minimize</u> the public costs and potential dangers associated with inappropriate development in frequently flooded areas, geologically hazardous areas, wetlands, fish and wildlife <u>habitat</u> conservation <u>habitat</u> areas, and areas with a critical recharging effect on aquifers."</p>
<p>4.o) Washington Department of Fish and Wildlife, 11/5/2025.</p>	<p>Proposed edits to CCC 31.05.210(6)(a). Eliminate reference to "state listed" with respect to bald eagles (no longer state-listed, only Federal).</p>
<p>4.p) Washington Department of Fish and Wildlife, 11/5/2025. Bald eagles are a federal issue, not state.</p>	<p>Proposed edits to CCC 31.05.210(6)(c). "Clallam County should work with the <u>U.S. Fish and Wildlife Service</u> <u>Washington Department of Wildlife</u> to develop an advanced Bald Eagle Management Plan for designated priority bald eagle habitat in the vicinity of Clallam Bay/Seki Urban Growth Area."</p>
<p>4.q) Washington Department of Fish and Wildlife, 11/5/2025. Incorporating "retrofitting" is consistent with Subsection (3)(b).</p>	<p>Proposed edits to CCC 31.02.820(3)(a). "Develop or modify building standards to reduce the impacts of climate change on indoor and outdoor building features. This may include requiring low-impact development <u>and retrofitting existing buildings</u> and stormwater runoff..."</p>

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<p>4.r) Washington Department of Fish and Wildlife, 11/5/2025. Staff concurs that maintaining larger tracts of land is integral to ecosystem health and one of the key benefits provided by forest lots.</p>	<p>Proposed edits to CCC 31.02.820(7)(b). “Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate refugia and critical habitats to strive for no net loss of ecosystem attributes, with a focus on achieving net ecological gains. Expand habitat protection, quality, and connectivity through designations such as conservation areas, expanded buffers, <u>maintaining large blocks of commercial and private forest lands</u>, greenbelts, wildlife and open space bridges and corridors. Incorporate climate considerations in determining permissible activities within wetlands and wildlife habitats.”</p>
<p>5) Emailed testimony received from Phyllis Sprinkle, 11/8/25. Supports adoption of policies for the protection of nighttime sky from the impacts of glare, consistent with recommendations from DarkSky Olympic Peninsula (see Public Comment, # 44).</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>6) Emailed testimony received from Nancy Field, 11/8/25. Same as # 5, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>7) Emailed testimony received from Pete Saari, 11/9/25. Same as # 5, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>8) Emailed testimony received from John Gussman, 11/10/25. Same as # 5, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>9) Emailed testimony received from Jan Standish, 11/10/25. Same as # 5, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>10.a) Jamestown S’Klallam Tribe, November 19, 2025. Definitions.</p>	<p>Propose new definition under CCC 31.02.050(17): <u>“Environmental Justice” means the fair treatment and meaningful involvement of all people regardless of race, color, national origin, tribal affiliation, disability</u></p>

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<ul style="list-style-type: none"> • Add definition for “Environmental Justice (recommends using Dept. of Commerce’s definition).” • Define “Best Available Science.” • Clarification is needed to understand the newly added section (j) under the “rural character” definition, which seems to contradict sections F, G and I by supporting more extensive development. If the intention of section J is to support gathering spaces and community connection, clarify that this would be through focused or targeted zoning in already developed areas. 	<p>or income with respect to the development, implementation and enforcement of environmental laws, rules and policies that affect human health and the environment. Environmental justice ensures that laws, rules and policies help protect vulnerable and overburdened communities from unfair environmental and health impacts. It focuses on providing equal access to resources and benefits, preventing harm, and creating sustainable and thriving communities for everyone.”</p> <p>Recommend a new Section 31.02.050(7): <u>“Best Available Science (BAS),” means the current and best available scientific information derived from valid scientific processes, including peer review, standardized methods, logical conclusions and reasonable inferences, quantitative analysis, proper context, and references, consistent with the criteria specified under WAC 365-195-900 through .925. BAS also incorporates a synthesis of the current scientific body of knowledge meeting the criteria specified within this definition.”</u></p> <p>Propose edits to CCC 31.02.050(32)(j): “Areas that foster and reflect a strong sense of community ties, local identity, and shared rural values through land use patterns that support gathering spaces, civic institutions, and integrational continuity. These areas promote social cohesion by maintaining development scales and zoning that reinforce community interaction, volunteerism, and locally rooted traditions.”</p>
<p>10.b) Jamestown S’Klallam Tribe, November 19, 2025. Under CCC 31.02.100(2), include in the list of identified land for public uses, include high-value ecosystems services (e.g. natural flood control, water storage, water filtration), wildlife corridors and riparian areas.</p>	<p>CCC 31.02.100(2) is verbatim language from RCW 36.70A.150. Recommended language may be better located under CCC 31.02.340.</p> <p>Propose new Section 31.02.340(1)(g): <u>“Policy 7. In addition to the identification of lands suitable for public purposes articulated under CCC 31.02.100(2), Clallam County should recognize the public benefits and work towards the acquisition and protection of lands that provide high-</u></p>

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<p>10.c) Jamestown S’Klallam Tribe, November 19, 2025. Amend Master Planned Resorts policy (CCC 31.02.250):</p> <ul style="list-style-type: none"> • Include a Section that clearly indicates that local Tribes be included in the planning process before development agreements are completed. • Amend Section (g) to recognize need for preservation of agricultural and forest lands, and sensitive habitats when considering MPRs. 	<p><u>value ecosystem services (e.g. natural flood control, water storage, water filtration), wildlife corridors, shorelines and riparian areas.”</u></p> <p>Propose new Section CCC 31.02.250(1)(k): <u>“Local tribes will be provided notice of application and will be included in the planning process before any development agreements or approvals are granted for a master planned resort.”</u></p> <p>Propose edits to Section CCC 31.02.250(1)(g): <u>“The County finds that the land is better suited, and has more long-term economic importance, for the master-planned resort than for no longer viable for the commercial management and harvesting of timber, and is not currently or likely to be placed in or agricultural production, if located on land that otherwise would be designated as forest or agricultural land of long-term commercial significance.”</u></p>
<p>10.d) Jamestown S’Klallam Tribe, November 19, 2025. Amend Environment and Open Space Policies (31.02.340):</p> <ul style="list-style-type: none"> • Section (1)(b): Add to the sentence the following underlined additions: “Prevention is less expensive than reversing up-pollution and ecosystem impacts later. Clallam County should consider the potential impacts and costs of treatment, remediation and restoration of environmental degradation resulting from land use practices, before such practices are allowed.” • Section (1)(e): Add to the sentence the following underlined additions: “Clallam County shall work with other agencies, tribes and individuals to prevent additional listing, uplisting or local population 	<p>Propose edits to Section 31.02.340(1)(b): <u>“Prevention is less expensive than cleaning/reversing up-pollution and ecosystem impacts later. Clallam County should consider the potential impacts and costs of treatment, of remediation and restoration, for of environmental degradation resulting from land use practices, before such practices are allowed.”</u></p> <p>Do not recommend edits to CCC 31.02.340(1)(e). Changes made in response to WDF&W (# 4.i, above) already changed the dynamic of the section.</p>

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<p>declines of fish, wildlife and 3 plants under the Endangered Species Act through proactive (rather than reactive) planning and implementation of proper land use practices.”</p> <ul style="list-style-type: none"> • New Section (1)(g): Add subsection G. Policy no. 7 as an addition to the new policy no. 6 to 32.02.340(1): “Clallam County will prioritize removal or retrofitting infrastructure that is placed within channel migration zones of streams and rivers to minimize negative impacts to fish and wildlife and improve resilience.” • New Section (4)(d): Make the final sentence of 31.02.340(4)(c) its own section D to highlight its importance and improve clarity and scope. Suggested change: “(D) Policy 13. Clallam County should undertake further studies of the groundwater regime of the County so that the factors influencing the quantity, quality and flow patterns of groundwater are more precisely known. These studies should prioritize…” 	<p><u>Proposed new Section 31.02.340(1)(g): “Clallam County will prioritize removal or retrofitting infrastructure that is placed within designated channel migration zones of streams and rivers to minimize negative impacts to fish and wildlife and improve resilience.”</u></p> <p><u>Propose new Section 31.02.340(4)(d): “Policy 13. Clallam County should undertake further studies of the groundwater regime of the County so that the factors influencing the quantity, quality and flow patterns of groundwater are more precisely known. These studies should prioritize:</u></p> <ul style="list-style-type: none"> <u>i. Updating aquifer mapping and flow patterns focusing on vulnerability assessments related to sea level rise and saltwater intrusion.</u> <u>ii. Analyzing the impacts of climate change on groundwater supply, integrating projected future water demand, and assessing the feasibility of groundwater supplementation.</u> <u>iii. Implementing findings to direct withdrawals toward the least hydrologically connected and reserve shallow wells as back-up supplies, reducing their use as primary municipal sources.”</u>
<p>10.e) Jamestown S’Klallam Tribe, November 19, 2025. Amend Climate Change and Resiliency Goals and Policies (CCC 31.02.820):</p>	

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- Section 31.02.820(1): Consider adding a section that encourages agricultural water conservation programs (i.e. through Clallam Conservation District, WA Water Trust or other responsible entity) that put existing irrigation water rights to non-traditional beneficial uses without compromising their water rights. There needs to be more outreach and policies to disincentivize intentional inefficient use to demonstrate continuous beneficial use.
- Section 31.02.820(1)(a) should include riparian areas as an ecosystem function improvement category. "Policy 1.1: Preserve land for long-term agricultural use, promote a regenerative framework, and restore ecosystem function on farms, such as wetlands, ponds, and riparian areas to preserve carbon sinks, promote water storage, improve soil health, and provide additional ecosystem services."
- Section 31.02.820(1)(c) should include technical assistance for shifting to high-value, low water-use crops. "Encourage farmers to adopt sustainable business practices such as regenerative farming, water storage, shift to high-value, low water-use crops and upgrading irrigation."
- Section 31.02.820(3)(b): Consider adding to the sentence "Specific activities to support energy justice may include expanding low-income energy assistance programs, promoting existing

Proposed new Section 31.02.820(1)(e): "Policy 1.5: Encourage and promote agricultural water conservation programs through the Clallam Conservation District, Washington Water Trust, and other responsible entities. Consider the strategic use of irrigation water for non-traditional beneficial uses without compromising existing water rights and focus on disincentivizing intentional inefficient use simply to demonstrate continuous allocated use."

Propose amending Section 31.02.820(1)(a): "Policy 1.1: Preserve land for long-term agricultural use, promote a regenerative framework, and restore ecosystem function on farms, such as wetlands, ~~and~~ ponds, and riparian areas to preserve carbon sinks, promote water storage, improve soil health, and provide additional ecosystem services."

Propose amending Section 31.02.820(1)(c): "...Encourage farmers to adopt sustainable business practices, such as regenerative farming, water storage, shift to high-value/low water-use crops, and upgrading irrigation..."

Propose amending Section 31.02.820(3)(b): "Specific activities to support energy justice may include expanding low-income energy assistance programs, promoting existing weatherization incentives and assistance, upgrading cooling infrastructure in facilities serving vulnerable populations, and implementing alternatives like preserving

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<p>weatherization incentives and assistance, 4 upgrading cooling infrastructure in facilities serving vulnerable populations, and implementing alternatives like preserving and increasing tree cover, shade structures and other passive cooling designs.”</p> <ul style="list-style-type: none"> Section 31.02.820(4)(a): Consider adding to the sentence “This may include incorporating riparian and stream habitat conservation measures into land use and infrastructure (transportation, water, sewer, electricity and zoning) plans to protect salmonid (typo correction) habitats developed by the County in partnership with cities, Tribes, service providers, and state agencies.” Section 31.02.820(7)(a): Consider adding several terms to this section. “Prepare ecosystems for climate impacts by implementing restoration actions for streams, wetlands, and watersheds, focusing on habitat connectivity, reducing invasive species, and improving watershed processes. This includes restoring riparian vegetation, floodplains, and stream structures to protect native fish and other aquatic life. Enhance habitat and community resilience to climate change by protecting and restoring coastal ecosystems, adapting to sea-level rise, and focusing on submerged aquatic vegetation and shellfish restoration for 	<p>and increasing tree cover, and adding shade structures and other passive cooling designs.”</p> <p>Propose amending Section 31.02.820(4)(a): “... This may include incorporating riparian and stream habitat conservation measures into land use and infrastructure <u>plans to protect salmonid habitats</u> (transportation, water, sewer, electricity and zoning) <u>plans to protect salmonid habitats</u> developed by the County in partnership with cities, Tribes, service providers, and state agencies.”</p>
	<p>Propose amending Section 31.02.820(7)(a): “Policy 7.1: Prepare ecosystems for climate impacts by implementing restoration actions for streams, wetlands, and watersheds, focusing on <u>habitat connectivity</u>, reducing invasive species, and improving watershed processes. This includes restoring riparian vegetation, floodplains, and stream structures to protect native fish and other aquatic life. Enhance habitat and community resilience to climate change by protecting and restoring coastal ecosystems, <u>addressing adapting to sea-level rise</u>, and focusing on submerged aquatic vegetation and <u>shellfish restoration</u> for habitat and “blue” carbon storage. Evaluate shoreline restoration and cleanup efforts, including concerns for Tribal cultural resources.”</p>

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<p>habitat and “blue” carbon storage. Evaluate shoreline restoration and cleanup efforts, including concerns for Tribal cultural resources.”</p> <ul style="list-style-type: none"> Section 31.02.820(7)(b): Consider rewording the first sentence to – “Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate change-mitigating systems and critical habitats that provide valuable ecosystem services. At a minimum, ensure no net loss of ecosystem function with a focus on achieving net ecological gains.” Section 31.02.820(12)(b): Consider adding an additional sentence to the effect of – “Promote lawn alternatives through xeriscaping and other low-water use, low maintenance designs. Clallam Conservation can provide direct consulting or provide resources to landowners to help facilitate lawn conversions and create co-benefits of reducing water use and promoting native species that support local wildlife and pollinators.” The Section 31.02.820(12)(e): Consider adding an expansion of water reuse by publicly owned treatment works to this section. 	<p>Propose amending Section 31.02.820(7)(b): “Policy 7.2: Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate <u>change-mitigating systems</u>, <u>refugia</u> and critical habitats <u>that provide valuable ecosystem services</u>. <u>At a minimum, ensure</u> strive <u>for no net loss of ecosystem functions</u> <u>attributes</u>, with a focus on achieving net ecological gains...”</p> <p>Propose amending Section 31.02.820(12)(b): “... Encourage residents to reduce water consumption through smart grid water use, repairing infrastructure, water reclamation systems, smart irrigation technologies, and updated water rates to discourage lawn watering. <u>Promote lawn alternatives through xeriscaping and other low-water use, low maintenance designs</u>. <u>The Clallam Conservation District can provide resources to landowners to help facilitate lawn conversions and create co-benefits of reducing water use and promoting native species that support local wildlife and pollinators</u>. <u>Promote incentives for sustainable food cultivation.</u>”</p> <p>Propose amending 31.02.820(12)(e) “... This includes maximizing on-site natural gas co-generation from anaerobic digesters, exploring the proximity of wastewater facilities to high-risk areas, and <u>improving wastewater access routes, and expanding water reuse by publicly owned treatment facilities.</u>”</p>
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<p>10.f) Jamestown S'Klallam Tribe, November 19, 2025. Amend Sequim-Dungeness Regional Plan (CCC 31.03.455): Clallam County should articulate a strategy to address nearshore impacts from residential use in low-bank shoreline areas along the Strait of Juan de Fuca, in the Dungeness-Jamestown neighborhood focus section. The section should discuss the water quality concerns and challenges of siting and maintaining septic systems in high saturation areas. The section should also discuss the nearshore impacts and concerns from residential nearshore armoring and outline the requirements Clallam County established for designated critical habitat of listed species under 5 the Endangered Species Act. This section should summarize the steps the County will take to engage the low-bank shoreline neighborhoods to proactively reduce/limit the harmful nearshore impacts and develop meaningful compensatory mitigation for impacts that cannot be remediated in the short-term.</p>	<p>Propose new Section 31.03.465(3): Shorelands. <u>(a) Policy 5. The areas of Three Crabs Road, Seashore Lane, and portions of Jamestown Road and Jamestown Beach Lane are located within a low-bank shoreline area where impacts from upland development can result in substantial impacts to the near-shore environment. As identified climate risks, sea level rise and increasing magnitude and frequency of storm events also place such areas at risk of substantial harm from erosion, flooding, salt-water intrusion and septic failure due to inundation. The Clallam County Shoreline Master Program (SMP) is identified as an element of the Clallam County Comprehensive Plan and is the primary regulatory authority for shoreland use pursuant to RCW 90.58. The following should be considered in developing a community and regulatory approach to addressing these changing conditions:</u></p> <ul style="list-style-type: none"> <u>(i) Suitability of the area to accommodate septic systems and potable wells in the context of changing conditions, given the potential impacts of bacterial contamination and risk of system failures.</u> <u>(ii) Increase risks to property and improvements, the commensurate increase in demand for additional protective shore armoring, and the cumulative impacts such armoring will have on adjacent properties and the nearshore environment, including impacts to designated critical habitat for species listed under the Endangered Species Act.</u> <u>(iii) Pursue broad public outreach with the intent of educating area residents on the risks associated with shoreline occupancy, problem solving, identification and execution of community-derived solutions rather than continuation of a piece-meal approach that merely reacts to individual circumstances.</u> <u>(iv) A systematic approach for identifying impacts and development of meaningful compensatory mitigation consistent with no net loss requirements under WAC 173-26-</u>
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<p>11.a) Addendum to Jamestown S’Klallam Tribe, November 19, 2025, Comments (Received 11/26/25). Agricultural resource land inventory and issues 31.02.115: Consider removing or adapting (2) bullet point three: “<i>Preservation of valuable historic and cultural resources</i>”. Agricultural land only preserves cultural resources that are below the plow zone and other agricultural land disturbances. The act of plowing impacts significant cultural resource information by disturbing the resources from their original context and potentially removing archaeological features which can yield important information about tribal history.</p>	<p><u>201(2)(c) for unavoidable impacts from shore protection measures and development.</u></p> <p>Recommend removal of 31.02.115(2), Bullet 3: Preservation of valuable historic and cultural resources;</p>
<p>11.b) Addendum to Jamestown S’Klallam Tribe, November 19, 2025, Comments (Received 11/26/25).</p> <ul style="list-style-type: none"> Historic and cultural resources polices 31.02.3530: a. Overall, the Tribal Historic Preservation Office (THPO) believes these policies provide insufficient guidance on preservation of cultural resources. THPO recommends the removal of Policy 1 and 2. b. THPO recommends adding Policies 1, 2, and 3 from the Clallam County Shoreline 	<p>Recommend removal of 31.02.350(1) and (2)(b): (1) “Policy 1. All jurisdictions should work individually and cooperatively to identify, record, study and encourage the preservation, maintenance and use of lands, sites, and structures that have historical and archaeological significance. The early identification and resolution of conflicts between preservation of historical or archaeological resources and competing land uses should be promoted and facilitated.”</p> <p>(2)(b) “Cooperatively plan, implement, and maintain corridor management plans for all proposed and existing Washington State Scenic and Recreational Highways (Hwy. 101 and Hwy. 112). Identify the long-term landscape character desired for scenic and recreational highways and their related cultural resources, and implement landscape</p>

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<p>Master Plan 35.25.160 listed below with the following edits: i.</p> <p>“(1) Sites and resources having known or suspected archaeological, historic, or cultural value should be protected. These sites/resources are important, nonrenewable resources and many are in danger of being damaged or lost because of ongoing development. Wherever possible, sites should be permanently preserved for scientific study and/or public observation consistent with 36 CFR 800 and Chapter 27.53 RCW. If the presence of an archaeological site is unknown then a survey should be conducted by an archaeologist. ii. (2) Proposed development on or adjacent to an identified archaeological, historic, or cultural site should be designed and operated to be compatible with continued protection of the archaeological, historic, or cultural site. iii. (3) The location of historic, cultural, and/or archaeological sites/resources should not be disclosed to the general public unless adequate provisions can be put in place to ensure long-term protection and preservation of such sites/resources.”</p> <ul style="list-style-type: none"> • THPO recommends the current 31.02.3530 Policy 3. be updated with a more extensive list of cultural resources regulations the County is required to follow including but not limited to: Clallam County 	<p>maintenance practices appropriate to ensure the resources' lasting character.”</p> <p>Propose adding new subsections (b) through (d) to 31.02.350(2):</p> <p><u>“(b) Sites and resources having known or suspected archaeological, historic, or cultural value should be protected. These sites/resources are important, nonrenewable resources and many are in danger of being damaged or lost because of ongoing development. Wherever possible, sites should be permanently preserved for scientific study and/or public observation consistent with 36 CFR 800 and Chapter 27.53 RCW. If the presence of an archaeological site is unknown, then a survey should be conducted by an archaeologist.</u></p> <p><u>(c) Proposed development on or adjacent to an identified archaeological, historic, or cultural site should be designed and operated to be compatible with continued protection of the archaeological, historic, or cultural site.</u></p> <p><u>(d) The location of historic, cultural, and/or archaeological sites/resources should not be disclosed to the general public unless adequate provisions can be put in place to ensure long-term protection and preservation of such sites/resources.”</u></p> <p>Propose amending 31.02.350(3): “Clallam County shall recognize tribal nations <u>as co-managers</u> in adoption of the Comprehensive Plan and development regulations. Affected tribal nations shall be notified of development applications prior to action and be given the opportunity to comment on the project's impact to tribal rights, as required by the State Environmental Policy Act, <u>the Clallam County Shoreline Master Plan,</u></p>
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<p>Shoreline Master Plan, Executive Order 21-02, SEPA, RCW27.53, RCW 68.60, WAC 25-48, WAC 25-46, RCW 27.44, RCW 68.50, etc</p>	<p><u>Executive Order 21-02, SEPA, RCW27.53, RCW 68.60, WAC 25-48, WAC 25-46, RCW 42.56.300, RCW 27.44, RCW 68.50, etc.</u></p>
<p>11.c) Addendum to Jamestown S’Klallam Tribe, November 19, 2025, Comments (Received 11/26/25). Climate Change and Resiliency Goals and Policies 31.02.820 a. Goal 4. Cultural Resources & Practices i. Policy 4.2: Recommend the following additions: Work with local Tribes to co-manage and protect archaeological and sacred sites, cultural properties, ecosystems, traditional foods, plants, sacred sites and cultural properties from and resources from climate-related threats...”</p>	<p>Propose amending 31.02.820(4)(b): “Policy 4.2: Work with local Tribes to co-manage and protect <u>archaeological and sacred sites</u>, <u>and</u> cultural properties, <u>ecosystems, traditional foods, plants and resources</u> from climate-related threats...”</p>
<p>11.d) Addendum to Jamestown S’Klallam Tribe, November 19, 2025, Comments (Received 11/26/25). Sequim-Dungeness Regional Plan: a. Rural land – Inventory analysis 31.03.260 (8) Historic and Cultural Resources: i. Recommend including the terms tribal cultural resources, sacred sites, and traditional cultural places in the list of resources of significance</p>	<p>Recommend amending 31.03.260(8): “<i>Historical and Cultural Resources</i>. The Sequim-Dungeness regional planning area has plentiful historical and cultural resources. Resources of significance include <u>tribal cultural resources, sacred sites, and traditional cultural places</u>, the Dungeness School, John Hyer Farm, Blue Mountain School, Emery Farmstead, Dungeness River Bridge, Manis Mastodon Site, McAlmond House, U.S. Quarantine Station Surgeon’s Residence, New Dungeness Light Station, New Dungeness, Graveyard Spit, Gierin Farmstead, Port Williams, and Washington Harbor.”</p>
<p>12) Email from John Worthington (received 12/03/2025). Comments included:</p>	<p>No policy recommendation. <ul style="list-style-type: none"> Agreed that policy language should be clearly articulated. </p>

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<ul style="list-style-type: none"> • Urging concise and clear language in the Comprehensive Plan. • Concerning environmental conservation, urged use of “measurable, evidence-based policy.” • Provided specific inference to utilizing 3% grades for protecting salmon spawning habitat, identifying the same was established for the Jimmycomelately Creek project that proved successful. • Urged referencing the Jimmycomelately project to provide historical context for strategies that have proven effective in salmon recovery. • Specifically requesting that “Jimmycomelately science should be written into the Clallam County Comp Plan, because the GMA requires BAS.” 	<ul style="list-style-type: none"> • Included several changes implementing/requiring Best Available Science (BAS), including: 31.02.050(7), 31.02.340(1)(a) & (c), 31.02.810(3), and 31.02.820(13(a)). • Depending on the species, salmon are able to spawn in a wide range of stream gradients. Further, salmon restoration includes consideration of water quality throughout the stream system drainage/watershed, including multiple factors such as riparian stability, shade, needle and wood recruitment, etc. Jimmycomelately was successful because the team was able to match action steps to specific system needs. While some components are transferable to other systems and watershed, not all are or in the same measure applied. • The Comprehensive Plan requires application of BAS in the recovery of salmonids. Although successful given the conditions of Jimmycomelately Creek, it would not be appropriate to apply a one-size-fits-all approach. It would certainly NOT meet BAS.
<p>13) Email from John Worthington (received 12/04/2025). Testimony included:</p> <ul style="list-style-type: none"> • Estimate of economic impact of failure to provide salmon restoration. • Description of the “fixed meandering coil” design that was used for restoring Jimmycomelately Creek, with design elements. • Explanation that the same design elements should be applied to the Dungeness, Elwha and Tumwater Rivers. • Inclusion of an aerial map of the Jimmycomelately project showing former and reconstructed channel, with request 	<p>No policy recommendation.</p> <ul style="list-style-type: none"> • The economic impacts of anadromous fish loss s widely known. Because continuation of species is theoretically indefinite, the actual financial benefit is unknown or could accurately be described as infinite. • The “meandering coil” or constructed channel meanders worked well in Jimmycomelately creek. However, the volume and energy gradients present in the Elwha and Dungeness rivers suggests that a fixed-meander approach detailed in the aerial maps would not be successful.

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<p>that the map be included in the Comprehensive Plan.</p> <ul style="list-style-type: none"> Proposed design elements for the three river systems identified. Assertion that the Dungeness is not being managed as Jimmycomelately Creek has been. Request to the BOCC that funding for the Dungeness Off-Channel Reservoir Project be halted until the river is modified to slow velocities using the same "fixed meandering coils" used on Jimmycomelately Creek. A series of four aerial photos of reaches of the Dungeness along with proposed locations for the "fixed meandering coils." 	<ul style="list-style-type: none"> As noted earlier, each system has its own specific needs regarding restoration, and should be tailored accordingly. Most of the same people involved in the Jimmycomelately project are also involved in the restoration of the Dungeness River. The slowing of river velocities on the Dungeness would involve reopening the floodplain to allow for volume and energy dissipation as it existed prior to settlement. The main problem is people live there. The Off-Channel Reservoir Project would provide supplemental irrigation water during low-flow periods, which addresses one of the key problems facing the Dungeness. As noted, such improvements within the Dungeness system would likely not work, give the increased volumes and energy. Constructed log jams do achieve the same energy-reducing effect and is being applied throughout the river system.
<p>14) Postcard testimony received from Eva Young & Family, received 12/8/25. Supports adoption of policies for the protection of nighttime sky from the impacts of glare, consistent with recommendations from DarkSky Olympic Peninsula (see Public Comment, # 44).</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>15) Postcard testimony received from Pamela Ziemann, received 12/8/25. Same as #14, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>16) Second postcard testimony received from Eva Young & Family, received 12/8/25. Same as #14, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>

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<p>17) Additional email testimony received from Luke Strong-Cvetich, Jamestown S’Klallam Tribe (received 12/9/25). Testimony included:</p> <ul style="list-style-type: none"> • Requests that the data under Figure 9, 2024 County Profile reflects Reservation and Trust land area of two square miles, and concerns over the accuracy of the population estimate for the same. • Requests that 31.03.435 be amended to “replace ‘overpass’ with multimodal safety improvements’ to reflect current Tribal discussions with WSDOT. 	<p>Recommend amending Figure 9 (Table) to reflect Jamestown S’Klallam Tribal Reservation & Trust land area of two acres, and incorporating a foot note concerning the accuracy of the census data regarding Tribal Trust and Reservation lands.</p> <p>Recommend amending 31.03.435(5): “<i>Transportation (Policy 5)</i>. Impacts to Highway 101 from development in Blyn must be mitigated. Improvements to intersections of County roads and Highway 101 will be required for new development which increases traffic congestion. An overpass Multimodal safety improvements on Highway 101 should be considered if traffic congestion caused by development of the casino impacts the regional mobility of the highway.”</p>
<p>18) Testimony received from Andy Sallee, Sequim Valley Airport, dated 12/2/2025. Testimony mirrored public comments received in January concerning expanding allowed uses within Airport Overlay District for Sequim Valley Airport. Recent comments requested allowing “short term cabin rentals, overnight camping, restaurant and food facilities.”</p>	<p>Under Public Comment #38, amending language was recommended for 31.03.340(8)(d), to allow consideration of “... vacation rentals and other limited lodging services” for Zone 3 of the Airport Overlay. Zone 3 of the Airport Overlay includes approximately 20 acres, of which about five has been developed with aviation-related buildings a taxiways. This leaves a substantial area that could be developed to whatever extent is allowed by Zoning. If “cabin rentals, overnight camping, restaurants and food facilities” were allowed outright and without limitations, the site could evolve into a resort destination. However, appropriately scaled, subordinate support businesses, such as a (one) small restaurant and incidental rental dwellings, could assist with the economic viability of the airport without introducing significant objectionable activities or characteristics. The details should be developed as part of a future (2026) update to the Zoning Code.</p> <p>For this purpose and for discussion, Staff proposes the following edits to 31.03.340(8)(d): “The County shall ensure the continued viability of the Sequim Valley Airport, including assurance that adjacent land uses do not cause conflicts with the continued use and maintenance of the</p>

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	<p><u>airport. This may include exploring the feasibility of expanding allowed uses within the Airport Development (Zone 3) portion of the Airport Land Use Compatibility Overlay to include vacation rentals or other limited lodging services. small-scale restaurants at a scale commensurate and subordinate to the airport, and other limited commercial services designed and limited to serve aviation uses and traveling customers."</u></p>
<p>19) Post card with hand-written testimony, received from the Matthiess Family, dated 12/10/2025. Same as #14, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>20) Post card with hand-written testimony, received from Martha Rudersdorf, dated 12/10/2025. Same as #14, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>21) Emailed testimony received from John Worthington, 12/16/2025. Original email also included emailed testimony from #13, above and appears to continue that discussion. Testimony included:</p> <ul style="list-style-type: none"> • Testimony advocates for use of BPA power utility easements for co-locating pipelines or aqueducts. • Advocates that an aqueduct system transferring water from high-volume watersheds to ow-volume would be preferable to the off-channel reservoir on the Dungeness River. 	<p>No specific policy recommendations is proposed. No change is recommended.</p>
<p>22) Letter of Testimony from Clallam County Marine Resources Committee, LaTrisha Suggs, Chair, dated 12/17/2025. Testimony was in two parts; second part included</p>	

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specific recommendations for test edits to the CP, which included:

31.02.340 “Environment and open space policies”

- (1)(c) Policy 3. The Critical Areas Ordinance and the Shoreline Master Program shall be utilized by Ciallam County to help achieve environmental objectives, prevent environmental degradation, and to manage land use activities within the natural and intrinsic constraints of the landscape and shoreline. The ordinances shall be amended as necessary to implement watershed or special area studies and to maintain consistency with the Comprehensive Plan. Practices under this chapter should be evaluated periodically regularly (at least every two years) to ensure regulatory effectiveness in achieving stated objectives and fair notification to affected property owners.
- (d) Policy 4. Education and incentives should be provided to the public on a regular basis to ensure their understanding of the principles behind regulatory protection and to increase support for protection outside of the regulatory framework.

31.02.340 “Environment and open space policies” (6) Marine Resources.

Recommend not adopting change. Two-year periodic review is far too frequent. DCD does not have the resources to keep pace with such a schedule, especially with other mandates required by law.

Recommend not adopting change. The scope of DCD’s duties are wide and varied. Public outreach is achieved when opportunities are available and resources, such as grant opportunities, become present. Obligating the Department to regular efforts in this regard is over-committing.

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<ul style="list-style-type: none"> • (a) Policy 16. Clallam County should shall work to <u>avoid achieve alternatives for sewage treatment plant discharges to marine waters (unless they achieve tertiary treatment) for and new or failing on-site septic systems subject to storm surge or sea level rise.</u> • (b) Policy 17. Clallam County shall preserve the scenic, aesthetic and ecological qualities of the marine shorelines of Clallam County, in harmony with those uses which are deemed essential to the life of its residents, <u>human and otherwise.</u> Clallam County shall implement marine resource goals through the Clallam County Shoreline Master Program and/or critical areas ordinance, as now or hereafter amended. <p>31.02.340 “Environment and Open Space Policies” (7) Habitat.</p> <ul style="list-style-type: none"> • (a) Policy 18. Land use practices should protect and enhance habitat corridors, diversity and richness, and ensure protection of wildlife corridors and habitat for threatened and endangered species. Wildlife corridors and riparian areas, <u>including marine shorelines,</u> should be maintained as important community infrastructure. • (b) Policy 19. Clallam County should protect, maintain and enhance fish and shellfish spawning, rearing, and migration 	<p>Changes already proposed to subsection (6)(a) per comments from Washington Department of Fish & Wildlife, per Testimony 4.k, above.</p> <p>Recommend adopting policy change. Protection of animal species is an integral part of “no net loss” and appropriately aligns the policy objective.</p>
<ul style="list-style-type: none"> • (a) Policy 18. Land use practices should protect and enhance habitat corridors, diversity and richness, and ensure protection of wildlife corridors and habitat for threatened and endangered species. Wildlife corridors and riparian areas, <u>including marine shorelines,</u> should be maintained as important community infrastructure. • (b) Policy 19. Clallam County should protect, maintain and enhance fish and shellfish spawning, rearing, and migration 	<p>Recommend adopting policy change. Marine shorelines are a key and distinguishable part of the natural landscape that offers habitat richness for all species, including threatened and endangered species.</p> <p>Recommend adopting policy change with an additional edit: suggest using “Damaged and degraded <u>upland, riparian and marine shoreline</u> habitat...” The distinction of including upland and marine shorelines</p>

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<p>habitat, and work to ensure harvestability of fish and shellfish. Damaged and degraded <u>upland and marine shoreline</u> habitat should be identified, prioritized and restored. Recognize the various levels of government which have a vested interest in protection, maintenance and restoration of habitat.</p> <ul style="list-style-type: none"> • (c) Policy 20. Clallam County shall recognize the large number of salmon and steelhead stocks, <u>forage fish, and shorebird nesting areas</u>, that have been classified as critical or depressed. The County shall work toward prevention of these <u>steaks-species</u> from being listed as threatened and endangered through habitat restoration and land use practices which cause no further degradation to habitat needs. 	<p>could potentially leave out riparian habitats. Including it makes the policy complete and effective.</p> <p>Recommend adopting policy change. Although anadromous fish species are priorities, all species that are critical or depressed are priority species of concern and should be protected.</p>
<ul style="list-style-type: none"> • 31.02.340 "Environment and Open Space Policies" (8) Runoff and Erosion. (Policy 21) Stormwater quality and quantity should be managed to protect shellfish beds, fish habitat, and other resources; <u>to protect the integrity of coastal bluffs</u>; to prevent the contamination of sediments from urban runoff and combined sewer overflows; and to achieve standards for water and sediment quality by reducing and eventually eliminating harm from pollutant discharges from stormwater and 	<p>Recommend adopting policy change. Emphasis on coastal bluffs is critical to near-shore processes. Protecting marine bluffs from accelerated erosion caused by uncontrolled stormwater discharges is important in protecting natural processes.</p>

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<p>combined sewer overflows. This goal should be achieved through a variety of means including:</p> <ul style="list-style-type: none"> • <u>Protection of coastal bluffs and bluff vegetation by preventing unmanaged drainage.</u> <p>31.02.340 "Environment and Open Space Policies" (9) Floodlains <u>and Marine Shorelines.</u></p> <ul style="list-style-type: none"> • (a) Policy 22. Flood control should be undertaken in the context of varied uses including agricultural and residential, fish and wildlife habitat, water supply, open space, and recreation. Land use and related regulations and zoning should reflect the natural constraints of floodplains, meander zones, and riparian habitat zones <u>including estuaries and marine shorelines subject to sea level rise.</u> Flood control measures should reserve to the fullest extent possible opportunities for other uses, including public access. • (b) Policy 23. Flood control should be undertaken in the context of an ongoing, systematic and comprehensive approach to basin management and preservation, <u>and for marine shoreline reaches subject to storm surge or sea level rise.</u> Changes in land use should try to restore the natural character of rivers, <u>and streams, estuaries and marine shorelines whenever</u> 	<p>Recommend adopting policy change per rationale above.</p> <p>Recommend not adopting this change. Some changes are noted as more appropriately located under Subsection (6), <i>Marine Resources.</i></p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p>
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<p>reasonably possible. Public understanding of the various uses and limitations associated with flood control should be improved through a variety of educational efforts <u>implemented on a regular basis</u>. A stable, adequate, and publicly acceptable long-term source of financing should be established and maintained for comprehensive basin management <u>and for comprehensive shoreline reach management</u>.</p> <ul style="list-style-type: none"> • (c) Policy 24. To limit potential for infrastructure damage from major and minor flood events, low intensity land use activities including <u>agricultural and recreational land uses in riverine floodplain areas and marine shorelines</u> should be encouraged, and other land uses in these areas discouraged. The need for emergency measures should be reduced or prevented through planning, structural, and nonstructural measures <u>with a strong preference for nonstructural habitat restoration measures</u>. • (d) Policy 25. To protect <u>riverine habitat</u> from flood damage and recognize upstream and downstream effects from flood management activities, Clallam County should require best management practices for maintaining natural river channel configurations <u>during dredging and gravel removal</u>. Nonstructural measures are preferred over structural 	<p>Recommend not adopting change. The scope of DCD's duties are wide and varied. Public outreach is achieved when opportunities are available and resources, such as grant opportunities, become present. Obligating the Department to regular efforts in this regard is over-committing.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend not adopting this change. Agriculture remains a low-intensity land use.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend not adopting this change. Other environments could potentially be impacted, not just "riverine."</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p>
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measures, but, when structural methods are necessary, they shall not obstruct fish passage. Structural flood control measures ~~should~~ shall preserve or enhance existing flow characteristics for fisheries, irrigation, and other river uses. Flood control activities should develop or improve diversity of habitat for fish and wildlife, and at minimum ~~not~~ result in no net loss to fish and wildlife resources, but wherever possible develop or improve diversity of habitat for these resources. To protect marine shoreline habitat from flood damage and recognize up- and down-current effects from flood management activities, Clallam County should require best management practices for maintaining natural shoreline configurations. Nonstructural measures are preferred over structural measures, but, when structural methods are necessary, they shall not obstruct fish passage. Structural flood control measures shall preserve or enhance existing beach and current flow-cell patterns. Flood control activities should develop or improve diversity of habitat for fish and wildlife resources, and at minimum result in no net loss.

Recommend not adopting this change. Use of "shall" is legally ambiguous. "Should" provides sufficient guidance.

Recommend adopting this change as it better reflects current state mandates concerning "no-net loss."

Recommend adoption of this change as CCC 31.02.340(6)(d), as it is more appropriately located under "*Marine Resources*." The tenants of this change comport with no-net-loss policy.

31.02.340 "Environment and Open Space Policies" (12) Nonpoint Source Pollution.

CPU Policy Response Table 3: Public/Agency Testimony

<ul style="list-style-type: none"> • Policy 30. Water resources shall be maintained in the highest quality and quantity to support recognized beneficial uses. To achieve this in the most efficient and cost-effective manner, water resource and waste management planning should be coordinated on a watershed basis across jurisdictional boundaries, <u>and consider marine waters of Clallam County.</u> The County should recognize and control the downstream and cumulative effects of individual practices on water resources. Education and incentives should be used as methods to prevent nonpoint source pollution. <p>31.02.820 "Climate Change and Resiliency Goals and Policies."</p> <ul style="list-style-type: none"> • (7) Goal 7. Ecosystems. (a) Policy 7.1: Prepare ecosystems for climate impacts by implementing restoration actions for streams, wetlands, <u>shorelines,</u> and watersheds, focusing on connectivity, reducing invasive species, and improving watershed processes. This includes restoring riparian vegetation, floodplains, and stream structures to protect native fish and other aquatic life. Enhance habitat and community resilience to climate change by protecting and restoring <u>marine flora and fauna</u> and coastal ecosystems, addressing sea-level rise, and focusing on submerged aquatic vegetation for habitat 	<p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p>
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CPU Policy Response Table 3: Public/Agency Testimony

<p>and “blue” carbon storage. Evaluate <u>and implement</u> shoreline restoration and cleanup efforts, including concerns for Tribal cultural resources.</p> <ul style="list-style-type: none"> • (8) Goal 8. Emergency Management. Promote and implement communication, transportation response, and education on preparedness and recovery efforts to ensure that all members of the Clallam County community are ready for climate emergencies, <u>both gradual (such as sea level rise or drought frequency) and catastrophic (such as storm surge or wildfire)</u>. Anticipate and be ready to accommodate the rise in demand for <u>short- and long-term</u> emergency services due to climate change impacts and understand community <u>and individual neighborhood</u> needs when preparing for emergency situations. • <i>The MRC recommends that the County provide notice and disclosure to current, future and prospective purchasers of properties with designated critical areas or shorelines of potential hazards and nuisances and the potential for land use regulations.</i> <p>31.02.250 [As amended] Master planned resorts land use policies.</p> <ul style="list-style-type: none"> • <u>(1)(h)</u> The master planned resort is consistent with development regulations of 	<p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend no policy change. Notice to Title is required for all permits issued within 200-feet of a wetland (27.12.215(9)), stream corridor (37.12.315(11)), landslide hazard (27.12.415(5)) or frequently flooded area (27.12.520(5)). Regulations concerning shorelines are administered under the Shoreline Management Act (RCW 90.58) and are not a part of the CPU process.</p> <p>Recommend not adopting policy change. Although “net gain” might be an appropriate goal, it exceeds recommendations from the Department</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>the County to protect critical areas to ensure <u>long-term net gain</u> no net loss of ecological functions and values <u>with no net loss</u>.</p> <p>31.02.340 "Environment and open space policies" (3) Wetlands.</p> <ul style="list-style-type: none"> • "Clallam County shall work to achieve <u>long-term net gain</u> no net loss of regulated <u>wetlands' functions and values through restoration and enhancement at the watershed scale, while allowing a reasonable use of property with no net loss, at minimum, with regard to their functions and values, in the short-term and should work to achieve a long-term net gain in these attributes through restoration and enhancement."</u> <p>31.02.820 "Climate Change and Resiliency Goals and Policies" (7) Ecosystems.</p> <ul style="list-style-type: none"> • (b) Policy 7.2. Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate refugia and critical habitats <u>with a focus on achieving net ecological gains of ecosystem attributes, while striving for no net loss, at minimum, of ecosystem attributes, with a focus on achieving net ecological gains.</u> Expand habitat protection, quality, and connectivity through designations such as <u>conservation areas, expanded critical area</u> 	<p>of Fish & Wildlife for project-level consideration. As originally amended, the section is compliant.</p> <p>Recommend adopting policy change with the recommendation that "...in the short term" be removed. The policy changes does not obligate the County to achieve net gain at the project level, but makes it an overall (aspirational) objective. Requiring "no net loss" is a requirement of the GMA.</p>
	<p>Recommend adopting policy change with the recommendation that "...critical area and all other..." be removed. Expanded buffers is sufficient to communicate the intent of this section; "all other" is open-ended and could imply (such as shorelines) buffers which are beyond the statutory authority of the GMA.</p>

CPU Policy Response Table 3: Public/Agency Testimony

and all other buffers, greenbelts, wildlife and open space bridges and corridors. Incorporate climate considerations in determining permissible activities within wetlands and wildlife habitats.

31.02.340 "Environment and Open Space Policies" (15) Oil and other Hazardous Materials Processing and Transmission.

- Policy 40. The coastline, coastal waters, and upland areas should be protected from the recognized problems and depreciation which could be brought about by oil or crude transport and oil ports and development associated with an oil port, oil storage, ~~oil or crude transport~~, and oil pipelines. Other industries with high energy and water requirements, a high pollution component, or which are incompatible with existing industries shall not be permitted. This includes, but is not limited to, oil ports and their associated developments, crude petroleum transfer facilities, tank farms and refineries, liquid natural gas transfer facilities, petrochemical plants and nuclear power and processing plants, and facilities processing any hazardous material known or proven to be hazardous.

31.02.420 "Transportation – Goals and Policies"

Recommend adopting policy recommendation. Although direct authority to govern commercial maritime traffic is not vested in the County, such policy statement could provide the BOCC opportunity to request inclusion in policy and regulatory program development.

CPU Policy Response Table 3: Public/Agency Testimony

<ul style="list-style-type: none"> Roads and Highways. (k) Policy 11. Protect wildlife habitat and prevent watershed degradation, where possible, through: <ul style="list-style-type: none"> (iii) New transportation arterials and major collectors which have the potential to transport hazardous materials should not be planned parallel to and in close proximity to <u>marine or riverine shorelines</u>. Transportation facilities should <u>shall</u> minimize the potential impact of accidental spillage of hazardous materials into any waterway. (2) Marine Transportation. [NEW— language based on similar policy under Roads and Highways] (c) Policy . Protect wildlife habitat and prevent marine <u>water quality degradation, where possible, through:</u> <ul style="list-style-type: none"> (i) Due to increases in tanker, barge, container ship and cruise ship traffic, the <u>County should advocate that expansion of marine transportation should enhance and/or restore fish and wildlife habitat.</u> (ii) <u>Marine transportation facilities should minimize the potential impact of accidental spillage of hazardous materials into any waterway.</u> (iii) <u>Bridges and other transportation facilities should not constrict the natural and dynamic condition of marine shorelines and estuaries.</u> 	<p>Recommend not adopting policy change. Lakes, ponds and other “shoreline” features could be omitted. Also, “shall” is legally ambiguous; “should” provides adequate guidance.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p>
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CPU Policy Response Table 3: Public/Agency Testimony

<p><u>(iv) Design road geometrics and drainage to intercept or minimize the transport of roadway sanding materials from entering marine shorelines.</u></p> <p><u>(v) Tug boat escorts are needed in more areas; home-porting is recommended for Port Angeles Harbor.</u></p> <p><u>(vi) Ensure local spill response coordination through emergency response planning and execution, including practice exercises and training. Consult the "Strait of Juan de Fuca Geographic Response Plan" (2024) for oil spills regarding protection of sensitive marine life in each geographic area.</u></p> <p><u>(vii) Advocate at the state level for maintaining or increasing agency spill responders in Clallam County.</u></p>	
<p>Online testimony submittal, received from Sarah Huling, dated 12/17/2025.</p> <ul style="list-style-type: none"> • Jason and I support Clallam County's Comprehensive Plan update and the County's obligation to comply with the Growth Management Act (RCW 36.70A). Our comment is focused on implementation clarity, particularly as residential densities are increased within Urban Growth Areas. • We request that the plan clearly reaffirm concurrency, stating that the development capacity identified in the Land Use and 	<p>Concern regarding concurrency is addressed under amended 31.02.320(6) and 31.02.420(7). No further policy change is necessary.</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>Housing Elements is contingent upon adopted levels of service and funded, scheduled infrastructure improvements in the Capital Facilities Plan.</p> <ul style="list-style-type: none"> As zoning capacity increases, it is important that the plan clearly distinguish between mandatory GMA requirements and provisions that depend on infrastructure capacity, so future development regulations do not rely on unfunded assumptions. With these clarifications, the plan will provide a more predictable and defensible framework for zoning decisions while continuing to meet statutory housing requirements. 	<p>As noted in 31.02.425 and Appendices I and L, growth impacts were considered with respect to facility capacities and projected growth. No further policy change is necessary.</p> <p>Agreed. No policy edits necessary.</p>
<p>24) Email from John Worthington, received 12/20/2025.</p> <ul style="list-style-type: none"> Testimony advocates for boring projects and creek diversions to install aqueducts for supplementing stream corridors with additional flows from systems that have an abundance of water, as an alternative to off-channel reservoir projects. 	<p>No policy change is recommended. The Department of Ecology has a strong policy against diverting water resources from one watershed to another. The costs, by the authors admission, are far more substantial than the water retention projects (off-channel reservoir, active aquifer recharge) being undertaken within the watershed. It also ignores the impacts of reducing water flows from one system in order to benefit another.</p>

CPU Policy Response Table 2: Planning Commission Issues

Clallam County Comprehensive Plan Update Planning Commission Discussion and Corresponding Recommendations Planning Commission, through December 26, 2025.

The following recommends policy amendments and new policy language addressing concerns expressed by individual Planning Commissioners, taking into consideration the discussions that took place during the prior work sessions.

Concern/Issue Discussed	Recommended Policy/Amendment
<p>1) Suggested policies to support the development of uniform development standards within UGAs, including sidewalks (surface materials), street lighting and landscaping, Setbacks, signage, commercial advertising (canopies, sign angles), shielding trash cans, etc. Think "theme of development."</p> <p>Staff Comment: Suggest incorporation of abutting City standards for uniformity upon annexation; development of "theme" standards for UGAs without abutting city.</p> <p>Approved by PC, 10/1/25</p>	<p>Policies for UGAs affiliated with Cities are addressed in subregional plans and primarily require the County to coordinate with and implement the design standards of the neighboring city for consistent communities upon annexation. The Carlsborg UGA section of the Sequim-Dungeness Regional Plan includes instruction for development standards. To address standards for unaffiliated UGA's, we suggest new language under subsection CCC 31.02.240(1)(c) as follows:</p> <p><u>Where an urban growth area is not affiliated with an incorporated city, the county shall work to implement uniform development standards that are commensurate to the scale, character and identity of the community. Features to consider may include but not be limited to sidewalks and surface materials, street lighting and landscaping, setbacks, signage, commercial advertising (canopies, sign angles), shielding trash cans, etc. The overall goal of this policy is to achieve a common theme of development that is reflective of the character and desire of the community.</u></p> <p>Development of the actual standards will be set forth in the Zoning Code Update.</p>
<p>2) Look at text of Comp Plan and suggest edits to implement an Ag Commission to advocate for agricultural interests.</p> <p>New edits proposed 11/05/25.</p>	<p><u>Recommend a new subsection CCC 31.02.120(8): - Clallam County will fully appoint and work closely with the Clallam County Agricultural Commission to monitor emerging issues and challenges faced by area farmers, assist with regulatory support and innovative solutions to identified challenges, and to remain adaptive to new opportunities for</u></p>

CPU Policy Response Table 2: Planning Commission Issues

<p>3) Define "rural character" to incorporate social and cultural aspects and to be community-oriented.</p> <p>Approved by PC, 10/01/25</p>	<p><u>agricultural accessory uses that help to diversify and strengthen agricultural operations.</u></p> <p>Recommend new subsection CCC 31.02.050(32)(j), "Rural character."</p> <p><u>(i) Areas that foster and reflect a strong sense of community ties, local identity, and shared rural values through land use patterns that support gathering spaces, civic institutions, and integrational continuity. These areas promote social cohesion by maintaining development scales and zoning that reinforce community interaction, volunteerism, and locally rooted traditions.</u></p>
<p>4) Consider language that promotes intermediaries to negotiate on behalf of, and represent the interests of, landlords in order to create more balance between tenants and landlords.</p> <p>Approved by PC, 10/15/25</p>	<p>Recommend new subsection CCC 31.02.283(3)(k): <u>Advocate in the interest of reestablishing a functional balance between the landlord and renter communities with respect to local and state regulatory frameworks.</u></p>
<p>5) Address the proliferation of vacation rentals and their impact on the housing market.</p> <p>Approved by PC, 10/01/25</p>	<p>Recommend a new subsection CCC 31.02.283(3)(l): <u>Establish a registry or similar mechanism to monitor and track the number of short-term rental units operating in Clallam County. Said registry could include key data points concerning short-term rentals and a requirement for life-safety inspections to ensure that designated short-term rental units meet minimum habitation requirements and are approved for the use indicated. Information obtained from the registry could be used to evaluate the impact of short-term rentals on the local housing market in balance with their contribution to the tourism industry.</u></p>
<p>6) Consider alternative design standards for rural roads, such as road width and alignment, in order to influence and address</p>	<p>Consider new subsection CCC 31.02.420(1)(vi): <u>Where there exists a clear public benefit and local circumstances support, traffic calming techniques, such as raised crosswalks, variation in horizontal alignments, and other design features, should be utilized consistent with</u></p>

CPU Policy Response Table 2: Planning Commission Issues

<p>traffic speed and to be more reflective of rural character.</p> <p>Approved by PC, 10/1/25</p>	<p><u>adopted ASHTO Guidelines for the implementation of such features; provided, said design standards do not conflict with locally-adopted design standards.</u></p>
<p>7) Establish a two-year deadline for the completion of the market analysis concerning indicators that would support the success of the Transfer of Development Rights (TDR) Program.</p> <p>Rejected by PC, 10/15/25</p>	<p>Consider amending proposed language under subsection CCC 31.02.283(3)(h): "Temporarily suspend the Transfer of Development Rights (TDR) program identified under Subsection 31.02.115(2)(d), CCC, and monitor until such time as economic conditions emerge that are conducive to its success. <u>To facilitate the program's reestablishment, seek grant funding or other resources to conduct a market analysis within two (2) years of this amendment to determine the appropriate market conditions and economic indicators that would provide for the program's utilization and success.</u>"</p>
<p>8) Include additional policy language under County-Wide CP Climate Element that: 1) encourages the transition of the County vehicle fleet to EVs, and 2) transitions gas-powered maintenance equipment to electrical.</p> <p>Approved by PC, 10/15/25</p>	<p><u>Consider new subsection CCC 31.02.820(2)(c): Although Clallam County is not required under House Bill 1181 to reduce greenhouse gas emissions, opportunities to take such measures would nevertheless be in the public interest and could improve resiliency. Therefore, with increased resiliency in energy generation and transmission, the County should explore grant funding and other resources for the transition of the County vehicle fleet from gas/diesel-powered to electric-powered or other renewable energy sources, where feasible and practicable. The same should be pursued concerning gas-powered maintenance equipment.</u></p>
<p>9) Public comments that request County commitment involving financial obligations for special-interest services/facility projects should be ignored.</p> <p>Rejected by PC, 10/15/25</p>	<p><u>Most comments of this nature were not provided with a policy update recommendation. The only one that comes close is Public Comment #60, that requests support for free community cultural centers. The policy language recommended does include an economic development objective: (under CCC 31.02.620(1)(j)(iv)) "Support the development of cultural centers and facilities for the public sharing of the arts and</u></p>

CPU Policy Response Table 2: Planning Commission Issues

<p>10) Incorporating statement about incentivizing smaller home construction, promotion of solar power, and active and passive geothermal power. Raised 11/19/25 by Commissioners Reandeau and Butler.</p>	<p><u>culture, and community events.” This language can be removed if desired by the Planning Commission.</u></p> <p>Propose Amending existing Policy 3.2 (CCC 31.02.820(3)(b)): <u>Align with the County’s Climate Action Plan to collaborate with partners to incentivize building improvements and retrofits for residential and commercial buildings in the County to improve energy efficiency, resilience, and justice. Innovative energy efficiency alternatives, such as incorporation of passive solar heating systems and geothermal heating and cooling systems should be explored.</u></p> <p>Suggest adding a new Policy 3.3 (CCC 31.02.820(3)(c)): <u>Smaller buildings are generally easier to heat and cool than large ones and use less energy. Create incentive structures that promote the creation of smaller residential dwellings to reduce energy reliance, increase resilience, and provide broader housing opportunities consistent with other Plan objectives.</u></p>
<p>11) Incorporating statement under CFP discussion on Telecommunications that recognize satellite communication technologies as a viable alternative to fiber optic broadband service.</p>	<p>Suggest inclusion of the following at the end of the Telecommunication section of the CFP, on Page 27:</p> <p><u>Alternative Telecommunication Technologies</u></p> <p><u>While expansion of broadband service remains fundamental to economic opportunity and communication needs of the County, emerging technologies in the area of wireless satellite internet and communication services are improving at increasing rates and may hold solutions for those more remote locations for which fiber optic broadband service remains infeasible or impracticable. Notwithstanding limitations regarding topography and forest vegetation, wireless satellite service also provides a viable alternative in terms of resiliency of service during and following natural disasters, such as earthquakes, landslides,</u></p>

CPU Policy Response Table 2: Planning Commission Issues

	<p><u>or widespread fire events that could potentially disrupt broadband service.</u></p>
<p>12) Provide a policy addressing the siting of Essential Public Facilities (EPFs) that protects existing neighborhoods, favors larger parcels, includes a checklist of concerns, and explores periodic performance review (from 12/17/2025 meeting).</p>	<p>Recommend amending section 31.02.300(8): <i>Essential Public Facilities. (Policy 17)</i> Essential public facilities are public capital facilities of a County-wide or State-wide nature which are typically difficult to site. Essential public facilities may be located in designated commercial forest or rural lands provided the County finds that such facilities cannot otherwise be located in urban areas, are largely self-contained or served by urban governmental services in a manner that adjacent rural or urban development is not promoted, and the facility does not cause nuisances (noise, dust, light, etc.) on adjacent properties that cannot be adequately mitigated. The siting of essential public facilities in resource lands should not interfere with resource management on adjacent resource lands. A process for determining and siting of essential public facilities should be developed that addresses the following:</p> <ul style="list-style-type: none"> <u>(a) The conditional use permit process will be utilized to ensure adequate consideration of operational characteristics and site conditions that, if left unaddressed, could introduce significant impacts to neighboring properties, services and facilities.</u> <u>(b) The siting of essential public facilities in resource lands should not interfere with resource management on adjacent resource lands.</u> <u>(c) Avoid to the degree practicable existing rural and urban neighborhoods where the potential for impacts could be greater.</u> <u>(d) Favor larger parcels where adequate room exists for addressing potential impacts from operational characteristics.</u> <u>(e) Consider alternatives for site selection that will substantially meet facility objectives but with reduced potential for impacts on neighboring properties or facilities.</u>

CPU Policy Response Table 2: Planning Commission Issues

<p><u>(f) Consider the adequacy of transportation facilities and other facilities and services needed to adequately provide for the new facility.</u></p> <p><u>(g) Consider the periodic performance review of essential public facilities to ensure adequate measures are maintained to reduce or mitigate potential impacts from operational characteristics.</u></p>	

CPU Policy Response Table 1: Public Comments (pre-hearing)

**Clallam County Comprehensive Plan Update
Public Comments and Corresponding Recommendations
August 12, 2025, with updates through the November 12, 2025**

The following summarizes issues raised during the public engagement and outreach efforts taken by Clallam County as part of its 2025 Comprehensive Plan Update (CPU). Efforts included several private and public community event presentations, an online survey which ran from December 26, 2024, through March 24, 2025, and public engagement meetings held in Clallam Bay (7/17/25), Joyce (7/22/25), Sequim (7/23/25), Forks (7/24/25) and Port Angeles (7/30/25). Public testimony has been invited throughout the CPU process, originating in June 2024. The Planning Commission has considered the enclosed comments during work sessions, starting on 8/20/25 and concluding on 10/15/25. The following summary identifies the issues raised, and if a policy is warranted, a draft policy that is being recommended by the Planning Commission. Nothing in this document is intended to restrict the Planning Commission or the Board of County Commissioners from considering any and all reasonable alternatives. All comments received have been retained by Clallam County as part of the record for the CPU.

Comment/Issue	Recommended Policy/Amendment	Staff Notes
<p>1) Need for maintaining transportation arterial flow throughout Clallam County, including bypass for the City of Port Angeles, Palo Alto intersection, Blyn, and possibly Forks in order to address congestion, for the wellbeing of the community and to facilitate economic development. The Bonneville Power Easement corridor was identified as a possible route.</p>	<p>Existing Policy: CCC 31.02.420(1)(c)(ii). Review need for new <u>or alternative</u> highway alignment to improve circulation and regional mobility in the Port Angeles subregion. <u>Observe and track potential regional congestion points along the SR 101 corridor throughout Clallam County, and plan for new highway corridors and bypass alternatives as needed to address congestion and maintain arterial flow and efficient regional mobility.</u></p>	<p>Comment at public outreach meeting, 7/17/25. Current policy appears to limit concern regarding regional mobility on SR 101 to the Port Angeles area. The proposed language will expand this concern to all areas that pose a risk of congestion and impacts to regional mobility.</p>
<p>2) Alternative/emergency access routes should be developed for the North Coast (SR 112 to Neah Bay), including the development of an alternative route from Forks to Neah Bay.</p>	<p>Recommend amending existing Policy CCC 31.02.420(1)(c)(iii). <u>Pursue</u> <u>Review</u> the <u>development of</u> <u>need to have</u> a new highway connection from Neah Bay to Ozette along or near the coast.</p>	<p>Comment at public outreach meeting, 7/17/25.</p>
<p>3) Consideration should be given to relocating the sewer treatment facility for Clallam Bay/Seki away from the shoreline as a</p>	<p>Proposed Climate Goal 3: Promote building retrofits and new construction that is sustainably built to minimize environmental impacts and enhance</p>	<p>Comment at public outreach meeting, 7/17/25. Proposed language of Goal 3, Climate Element, addresses the concern of this comment.</p>

CPU Policy Response Table 1: Public Comments (pre-hearing)

resiliency and emergency management measure.	resilience against extreme weather and other risks exacerbated by climate change.	
4) Policy and regulatory approaches to managing commercial forestry should carefully consider the present costs of doing business in forestry (e.g. land, equipment, transportation, labor, etc.).	<p>Recommend a new Subsection 31.02.140(5): <u>Development of policy and regulatory approaches to managing commercial forest lands should carefully consider present and ever-changing costs of conducting commercial forest operations, including land, equipment, labor, regulatory compliance, and transportation. Where feasible, regulations should be crafted to facilitate commercial forestry and avoid presenting a barrier to the same.</u></p>	Comment at public outreach meeting, 7/17/25.
5) Barging and marine transportation should be strengthened as a means of facilitating industrial business operations in Clallam County as a cost- and logistically-effective alternative to trucking.	<p>Recommend a new subsection CCC 31.02.420(2)(a)(iv): <u>Explore the siting of a new marine barging facility within the Clallam Bay/Seki UGA to establish and facilitate industrial marine transport.</u></p>	Comment at public outreach meeting, 7/17/25.
6) Clallam County should consider incentives and disincentives to address the proliferation of second-home and investment home vacancies, and to restore adequate rental stock.	<p>Recommend a new subsection CCC 31.02.283(3)(h): <u>Consider implementation of incentives and disincentives, such as special tax initiatives, to facilitate second-home and out-of-area owners providing their homes for medium (>30 days to one year) and long-term (one year or more) rental opportunities.</u></p>	<p>Comment at public outreach meeting, 7/17/25. Amended language proposed in response to 8/20/2025 Planning Commission work session.</p>
7) HipCamp (commercial campgrounds) is strongly supported by some residents, who own and operate a facility without issue. Fire concerns were expressed as one issue that might be addressed through controls, such as fire pit density standards and clear zones.	<p>Recommend adding the following to subsection CCC 31.02.620(1)(j)(iv):</p> <ul style="list-style-type: none"> Standards should be considered for recreational uses in rural areas, including limited camping facilities along non-motorized trails such as the Olympic Discovery Trail, and commercial outdoor oriented activities. 	<p>Comment at public outreach meeting, 7/22/25. Sequim and Port Angeles Regional Plans (CCC 31.03.270(8) and .04.260(6)(c), respectively) call for development of operational standards for private campgrounds, setting a minimum lot size of five acres. Straits and West End CPs do not specifically mention campgrounds but generally support outdoor-oriented recreational uses with reasonable conditions to minimize nuisances and</p>

CPU Policy Response Table 1: Public Comments (pre-hearing)

	<ul style="list-style-type: none"> o <u>Standards for buffering and landscaping to ensure compatibility with surrounding rural land uses shall be accomplished.</u> o <u>Standards for noise, traffic, light, and glare, and other nuisance characteristics.</u> o <u>Such uses shall be located on a minimum parcel size of five acres.</u> 	<p>impacts. Recommend standardizing policy under the Countywide Comprehensive Plan to establish broader consistency and direct implementation of standards and thresholds.</p>
<p>8) Community bicycle access to the Discovery Trail is supported as a priority. The commentors noted that with younger people, vehicle ownership is down, especially with the expansion of e-bike use. Safe bicycle access to community and regional trail corridors is important.</p>	<p>Recommend amending existing Policy 31.02.420(5)(c): A system of lateral/feeder routes should connect Highway 101 to the Olympic Discovery Trail. <u>Additional lateral routes should be explored and developed to provide expanded multimodal connectivity between residential areas, community features, and the Olympic Discovery Trail.</u></p>	<p>Comment at public outreach meeting, 7/22/25.</p>
<p>9) Road design standards should reflect rural character and needs, limiting the width and scope of road dimensions. It was expressed that wider streets promote speeding.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 7/22/25. Clallam County has adopted by Ordinance the City and County Design Standards for the Construction of Urban and Rural Arterial Collectors (1999, per RCW 35.78.030 and RCW 43.32.020). The Standards incorporate AASHTO standards, making the County eligible for State and Federal Funding for road maintenance and safety improvement implementations. Reducing road dimensions below the design criteria would harm the County's ability to maintain this needed funding.</p>
<p>10) Concerning <i>no net loss</i>, it was suggested that standards should provide clarity as to what it means and how it is applied.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 7/22/25. Staff agrees that clear communication on the meaning of the term should be provided, however, this is appropriate for consideration under the required updating of the CAO and not necessarily the CPU.</p>

CPU Policy Response Table 1: Public Comments (pre-hearing)

<p>11) The question was raised whether the four subregional planning boundaries within Clallam County should be modified.</p>	<p>No Policy Recommendation.</p>	<p>Comment at public outreach meeting, 7/22/25. Although the boundaries of the four Subregional Planning Areas should be evaluated from time-to-time, the topography, intervening state and federal ownerships, and other community identity factors suggest that the current planning boundaries continue to accurately function to divide the County into convenient sub-regional units appropriately situated for the development of specific land use policies crafted according to local needs specific to each geographic location.</p>
<p>12) It was questioned whether trails should have a separate process from the 6-Year Transportation Improvement Plan (TIP) process, as it places prioritizing trails with road improvements and maintenance.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 7/22/25. Matter was discussed with the Deputy Public Works Director. Although trail facilities are allocated through the 6-Year Transportation Improvement Plan (TIP) along with road projects, the two do not typically compete directly for the same funding sources. Trails are required under the GMA as part of the multi-modal transportation facility requirement, and establishing priority projects through the TIP is an effective way of determining priority projects.</p>
<p>13) It was expressed that no growth should be allowed; the rural character of the County is why people move here.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 7/23/25. The requirements of the GMA mandate that we plan for growth, not preempt it. No policy recommendation is advised. Protection of rural character is achieved under the GMA with rural land use and zoning designations to create a framework that allows for growth while maintaining rural character.</p>
<p>14) With reference to SR 101, it was expressed that one road in/one road out is problematic. The County should explore multiple access points to the Peninsula.</p>	<p>Recommend amending proposed Policy 10.1, Climate Element: Explore options for designing new and expanded roads and multiuse pathways to minimize impacts on shorelines, accommodate sea-level rise, preserve ecological functions, and avoid disrupting water-related uses, public access, and habitat restoration. Identify roads and bridges vulnerable to flooding and landslides and collaborate with the</p>	<p>Comment at public outreach meeting, 7/23/25. Recommended language to specifically address connectivity between Peninsula and rest of Western Washington.</p>

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	<p>Washington State Department of Transportation (WSDOT) to improve resilience of assets outside the County's jurisdiction, <u>including identification of alternative access corridors within and outside of Clallam County's jurisdiction to create redundancies for emergency preparedness and to increase connectivity between the Olympic Peninsula and the rest of Western Washington. This will include working with cities and Tribes to map infrastructure and create agreements for alternate transportation routes in parks, private lands, and Forest Service roads to ensure public safety and emergency access.</u></p>	
<p>15) The Sequim Bypass project was referenced as a good start for regional arterial flow. The emerging choke-points of Palo Alto road and Blyn suggest we should be planning for bypasses to these areas as well.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 7/23/25. Proposed edits to CCC 31.02.420(1)(c)(ii), Comment 1, above, already address the concerns of this comment.</p>
<p>16) It was suggested that disincentives, such as increased taxes, be applied to properties with vacant homes to help stimulate housing stock.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 7/23/25. This issue was already addressed above.</p>
<p>17) Concern was expressed over the acquisition of private lands by area Tribes and then not having to abide by zoning or other land use regulations.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 7/23/25. The acquisition of land by local tribal communities and conversion to tribal trust status is well within the protected and sovereign right of the tribal entities. No policy recommendation is warranted.</p>
<p>18) It was suggested that the County implement protections for manufactured home parks to protect elderly and low-income</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 7/23/25. Although concern does exist with respect to existing mobile home parks being converted to another use, establishing a regulatory prohibition on conversion is feared to create a disincentive for the development of</p>

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<p>tenants from change of use resulting in evictions.</p>		<p>needed low-income housing through creation of new manufactured home parks or other housing.</p>
<p>19) Concern was expressed that families could no longer simply divide their property to leave equal parts to their children, resulting in younger people leaving the area.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 7/23/25. Fundamental to the GMA is that only rural densities (one home/five acres and less) be allowed in rural areas and only urban densities (at least 4 homes/acre) be allowed in urban areas. Outside of LAMIRDs, anything in between is considered sprawl and is prohibited.</p>
<p>20) It was expressed that the tightening of irrigation ditches was causing harm to area aquifers and the County should enforce against it under the Critical Areas Ordinance. Petition signatures signed by 73 signatories.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 7/23/25. The Dungeness Valley Irrigation tightening project was originated within the WR1A 18 Watershed Plan. A Final Environmental Impact Statement was issued for the project in November 2003. The project is sponsored by the Washington Department of Fish & Wildlife, is considered a watershed restoration project in accordance with RCW 89.08.460(2)(c), and possibly a fish enhancement project in accordance with RCW 77.55.181. Local permit authority is preempted by RCW 77.55.181(3)(a) and RCW 89.08.470. Further, since it was originated by the WR1A 18 Watershed Plan, Clallam County does not oppose the project in any way as it addresses the illicit withdrawal of waters of the Dungeness.</p>
<p>21) It was noted that the tourism industry is very important to Clallam County. The commenter noted that Clallam County should allow commercial campgrounds outright in all rural zones, and the conditional use permit process is too onerous and should not be required.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 7/24/25. As noted earlier (Comment 7), draft policies have been proposed to strengthen the possibility of prescriptive standards and thresholds for private commercial campgrounds throughout the County. That policy recommendation addresses the concerns expressed here.</p>
<p>22) It was suggested the County allow a campground to operate for two years and</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 7/24/25. See responses to Comments 7 and 21, above.</p>

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<p>then require a conditional use permit only if issues arise.</p>		
<p>23) Concern was expressed over the cost and onerous requirements of the CUP process for development a commercial campsite. The commentor identified several benefits HipCamp and similar private campgrounds provide the region, including preservation of the natural environment, open space, and contributing to the tourism industry. Discussions over possible prescriptive standards and thresholds for primitive campgrounds were discussed</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 07/30/25. See responses to Comments 7, 21 and 22, above.</p>
<p>24) The use of private cisterns as a means of supplementing fire suppression efforts by rural fire districts was supported.</p>	<p>No policy recommendations</p>	<p>Comment at public outreach meeting, 07/30/25. Use of cisterns for potable water or other purposes (fire flow) are administered by the Environmental Health Division and not the DCD. It is not necessary for a policy regarding their use for fire suppression or otherwise.</p>
<p>25) Concern was expressed whether changes to the Comprehensive Plan could render formerly-issued conditional use permits invalid. Staff provided assurance that once issued and the use maintained, a CUP remains vested for the duration of the use, regardless of changes in zoning.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 07/30/25. Once a Conditional Use Permit is issued, it is vested for the life of the project. No policy changes are warranted.</p>
<p>26) Concern was expressed that, given the breadth of issues covered in the Comprehensive Plan, adequate time for Planning Commission and BOCC review was not provided, and changes should be adopted requiring a minimum Two-year review process</p>	<p>Recommend a new subsection CCC 31.08.380: <u>Periodic Update of Comprehensive Plan. In accordance with the requirements of RCW 26.70A.130 as now or hereafter amended, the Comprehensive Plan shall be reviewed every 10 years and updated to ensure compliance with the current requirements of the</u></p>	<p>Comment at public outreach meeting, 07/30/25. In a perfect world, staff would have completed the LCA and other background research well in advance of forwarding any draft recommendations on the CPU, with ample time for consideration. Unfortunately, it was not understood the degree to which GIS had been neglected for the prior 3.5 years, or the true scope of new elements to the</p>

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<p>for a CPU. The commentator noted that metrics were needed and reporting required under CCC 31.08.200(12) had not been provided.</p>	<p><u>Growth Management Act and in response to community needs and desires. To ensure adequate opportunity for public engagement and involvement and full consideration by the Planning Commission and the Board of Clallam County Commissioners, said review should be initiated 36-months prior to the deadlines established under RCW 36.70A.130(4) and (5), as applicable.</u></p>	<p>LCA as are now required. These setbacks along with setbacks in procuring consultant assistance could not have been fully anticipated. Simply codifying a desired schedule for the CPU could place the process in jeopardy by setting requirements that may or may not be achievable under any range of circumstances. For this reason, staff does not recommend codifying a review schedule. Concerning the reporting parameters identified in CCC 31.08.200(12), this information was established with the first iteration of the Comprehensive Plan under the GMA (1995). At the time, reporting on the identified parameters seemed reasonable and was thought to assist in future CPUs. There was also a fully-staffed Long Range Planning Division at that time, which no longer exists. To our knowledge, complete reporting under this section has not occurred since, and under current staffing, is not going to in the future. It may be preferable to strike this section altogether to eliminate false expectations. Draft language proposed in response to 8/20/2025 Planning Commission work session.</p>
<p>27) Concern was expressed that studies conducted and provided to Clallam County approximately ten years prior indicated multiple properties at risk of sea level rise and wildfire risk. The commentator mentioned that eastern Clallam County ranked fifth in the state concerning risk of catastrophic loss due to wildfire. The commentator noted that with that knowledge, the DCD had an obligation to provide notice to title to alert landowners to the risk, and that the County should map these areas of concern.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 07/30/25. The concept has been discussed with Legal Counsel. Notice-to-Title requires certainty in determining the condition. In the Critical Areas Ordinance, Notice-to-Title is a requirement of permit approval based on an accurate determination of the presence of a critical area. As a policy that would simply apply across a broad spectrum of landowners, the Notice would create substantial liability to the County for clouding of title. It is recommended that public outreach and education be favored over Notice-to-Title.</p>
<p>28) Concern was expressed regarding Canada's use of the Strait of Juan de Fuca for transport of oil sands crude—citing that it is</p>	<p>Recommend amending subsection CCC 31.02.340(15) as follows: The coastline, coastal waters, and upland areas should be protected from the recognized</p>	<p>Comment at public outreach meeting, 07/30/25. The jurisdictional influence of Clallam County over commercial transport by Canada is limited. However, to the extent that such policy could give</p>

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<p>heavier than water and could result in catastrophic ecosystem loss should a spill occur.</p> <p>29) It was suggested that the Comprehensive Plan be considered expansive with regard to other jurisdictions and should be integrated with regional and international issues that impact Clallam County.</p>	<p>problems and depreciation which could be brought about by oil ports and development associated with an oil port, oil storage, oil or crude transport, and oil pipeline.</p> <p>No policy recommendation.</p>	<p>Clallam County a voice in addressing safety concerns of crude and oil transports within the Strait of Juan de Fuca, the policy would have positive impact.</p> <p>Comment at public outreach meeting, 07/30/25. RCW 36.70A.100 requires that Comprehensive Plans be coordinated with, and consistent with, neighboring city and county jurisdictions. However, the intent of this provision is to ensure that choices made by one jurisdiction do not adversely impact the choices made by another concerning future growth and development. It does not mean, for example, that the plans should be the same or call for the same remedies for identified issues. And while part of the consideration of future planning may involve infrastructure or resources that cross jurisdictional boundaries, there is still a clear limit, tied to the jurisdictional boundary, on the influence one jurisdiction can have over another. Coordinating and influencing common issues is important for all jurisdictions to do. But there is no authority within the GMA that grants a county or city jurisdictional control over another.</p>
<p>30) Concern was expressed that public funding should be devoted to the extension of urban services (sewer, water, power, etc.).</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 07/30/25. Commentor did not recommend policy but merely saw it as a funding obligation of the BOCC. Staff informed the commentor that provision of urban services are typically the responsibility of the adjacent city jurisdiction, not Clallam County.</p>
<p>31) Additional support for HipCamp and private for-profit campgrounds, reiterating concerns that the CUP process is too expensive and onerous.</p>	<p>(same as above)</p>	<p>Comment at public outreach meeting, 07/30/25.</p>

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<p>32) Concern was expressed that the final recommendation of the Consultants concerning the Transportation Element should be afforded a public discussion opportunity.</p>	<p>No policy recommendation.</p>	<p>Comment at public outreach meeting, 07/30/25. Suggest holding additional public information meetings once transportation and CFP elements are complete.</p>
<p>33) With regard to expanding industrial land base, the Maritime Program being offered at Peninsula College should be coordinated with that effort as commercial sea transport works in tandem with, and supports, industrial development and growth.</p>	<p>Recommend amending subsection CCC 31.02.620(j)(ii):</p> <ul style="list-style-type: none"> Recognize and endorse marine services as an economically significant industry in which Clallam County has unique qualities and competitive advantages; Chapter 31.02 CCC, County-Wide Comprehensive Plan Page 219 of 233 The Clallam County Code is current through Ordinance 1021, passed July 9, 2024. Support the development and maintenance of essential marine infrastructure within the County, including marinas, industry piers, boat ramps and recreational access facilities. <u>Clallam County should coordinate industrial land base expansion (zoning) with the Peninsula College Maritime Program, to leverage growth in maritime transport/industry with industrial expansion.</u> 	<p>Comment at public outreach meeting, 07/30/25. Incorporating the maritime educational program may be an avenue to further leverage the success of the expansion of industrial land base with the transportation opportunities available at the Port of Port Angeles. This is one solution to the added costs of trucking from the Peninsula.</p>
<p>34) Supports identifying (mapping) private forest lands at risk of conversion. Such forests are priorities for set-aside under Natural Climate Solutions account funding (RCW 70A.65.270) or Trust Land Transfer legislation (RCW 79.17.300).</p>	<p>No policy recommendation.</p>	<p>Comments received 5/28/24. RCW 79.17.300 deals with State Trust Lands, which are not likely to ever convert. These lands are already mapped and identifiable. With respect to RCW 70A.65.270, lands likely to convert include all residential zoning districts and mixed residential/forestry. It's unclear of any benefit would be realized by this requested mapping exercise.</p>
<p>35) Concerns were expressed over issuance of recent shoreline permits/exemptions allowing development of bulkheads and similar shore revetments. The letter requests a strategy that protects property and</p>	<p>No policy recommendation.</p>	<p>Comments received 3/26/25. The permit issues in question are related to the Clallam County Shoreline Master Program (SMP), promulgated under the Shoreline Management Act, not the GMA. Staff has been working on solutions to the permitting issues encountered. A policy change is not needed and is not appropriate</p>

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<p>shorelines along Three Crabs Road. The commentors go into great depths the range of environmental and health-related problems that will likely emanate from continued sea level rise and other effects of climate change.</p>		<p>given the legislative source of the regulation; however, this matter will be retained for consideration in the future review and update of the SMP.</p>
<p>36) Recommends including the agricultural accessory use standards under CCC 33.48 be included in the CPU, and that they be extended to farms located within designated UGAs. The commentor cites the requirement for a conditional use permit as unfairly burdensome.</p>	<p>No policy recommendation.</p>	<p>Comments received 5/28/25. The issue of specific agricultural accessory uses is appropriate for review. However, it remains staff recommendation that, due to higher residential densities and the imperative to promote affordable housing, agricultural accessory uses should not be considered a priority within designated urban growth areas. Such uses are still available under a conditional use permit.</p>
<p>37) Supports treating short-term rentals as "cottage industries" to be supported by the Comprehensive Plan.</p>	<p>No policy recommendations.</p>	<p>Comments received 1/22/25. Short-term rentals (STRs) presently provide visitors to the Peninsula opportunity to stay in a range of locations and settings in converted residences and other structures. They provide the landowner opportunity for additional income, and provide the local economy increased spending through tourism. But due to their popularity, they also can be in competition for limited available housing stock. Presently, the Code is neutral on whether they are an asset to be promoted or a detriment to be regulated. When the City of Port Angeles did an analysis of the extent of STRs within city limits, they found that for every STR, there were four vacant homes with out-of-area owners. While staff recommends that the issue be studied further (see recommendations below), we are not in a position to recommend regulatory controls, or to recommend that they be promoted.</p>
<p>38) Supports modifying the Airport Overlay District, Airport Development (Zone 3) to eliminate the restriction of "no human occupation" and support short-term rentals,</p>	<p>Recommend amending subsection 31.03.340(8)(d): The County shall ensure the continued viability of the Sequim Valley Airport, including assurance that adjacent land uses do not cause conflicts with the continued use and maintenance of the airport. This</p>	<p>Comments received 1/7/25. Staff reviewed WSDOT Airports and Compatible Land Use Guidebook (January 2011) and relevant portions of Federal Aviation Regulations Part 77 (FAR). The primary focus of airport planning includes the compatibility of adjacent land uses with the expected noise and operational</p>

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<p>AirBNBs, and other lodging and service uses affiliated with the Sequim Valley Airport.</p>	<p>may include exploring the feasibility of expanding allowed uses within the Airport Development (Zone 3) portion of the Airport Land Use Compatibility Overlay to include vacation rentals and other limited lodging services to serve aviation traveling customers.</p>	<p>nuisances associated with airport uses. Secondly, the Airport Overlay District also concerns itself with the uses and intent of the underlying zone—in the case of Sequim Valley Airport, the Agricultural Retention (AR) Zone. However, the Airport Development (Zone 3) area is limited and already contains airport-related facilities. If restricted to this portion of the site, approval of the amended policy would not further intrude into viable agricultural lands but would improve the economic viability and services provided by the airport. Since the services would be provided by the airport to airport clientele, there would be no non-compatibility issues.</p>
<p>39) The Cities and County should coordinate in planning for the UGAs. Is current zoning appropriate to achieve the city's vision for future annexations? Are the development standards correct?</p>	<p>No policy recommendations.</p>	<p>Comments received 3/10/25. The cities and the County have been in coordination as required under RCW 36.70A.100 and the Countywide Planning Policies. This coordination will continue through the completion of the CPU, development regulations (to be completed within six months of the CPU), and the updating of future service extension and annexation agreements.</p>
<p>40) Supports ordinance enabling low-impact camping on private land. Suggests performance standards for fire safety, noise, sanitation, waste management, and other considerations.</p>	<p>No policy recommendation.</p>	<p>Comments received 7/29/25. See response to Comment 7, above.</p>
<p>41) Supports primitive camping on private property via HipCamp. Includes several resources for communities that have adopted standards and processes for approval.</p>	<p>(Same as above)</p>	<p>Comments received 7/11/25. See response to Comment 7, above.</p>
<p>42) Supports expanded opportunity for "...affordable, transitional, and supportive housing that allows pets and emphasize proximity to health care, transportation, and</p>	<p>No policy recommendation.</p>	<p>Comments received 5/17/25. The increased requirements for housing affordability to all income segments address, in large part, the concerns of this section. Because extremely low, very low and low-income housing (0-80% AMI) are located within cities and</p>

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<p>commercial areas." Options should be varied. Economic opportunity should include unskilled labor and job training for skilled positions. Changing climate should foster consideration of homelessness vulnerability.</p>		<p>UGA's, such housing will be located within proximity to health care, transit, and commercial areas. Climate Policies 5.1, 9.1, 9.3 and 9.4 address homeless vulnerabilities with climate change. Recognizing and supporting education and training for a skilled workforce is also supported under CCC 31.02.610(8)(c).</p>
<p>43) Identifies that the S(DRP) zone has only one business owner and the Department of Ecology, unwilling to sell. No jobs will be created for people who live there.</p>	<p>No formal response at this time.</p>	<p>Comments received 7/1/25. We recognize the practical deficiency expressed in this comment and are working with the City to develop practicable solutions. We will provide them to the Planning Commission once complete.</p>
<p>44) Requests expansion of policies and regulations controlling nighttime light pollution and light trespass. The letter identifies five principles, including: allowing only exterior lighting that is necessary, targeting lighting only where it is needed, allowing exterior light only at levels no greater than necessary, using exterior lighting only where it is needed, and using warm-color lights where possible.</p>	<p>Recommend amending subsection CCC 31.02.340(11)(b) as follows: To reduce light pollution while meeting the needs for public safety, <u>encourage</u> the use of reflectors and appropriate aiming on new outdoor lighting to minimize the upward scattering of light. Performance standards for <u>exterior commercial</u> lighting should be developed which minimize night glare and hours of operation at the minimum level to protect property and public safety. <u>Considerations for the development of reasonable standards may include the use of light only when and if it is needed, direct light only where it is needed, control light so it is no brighter than is needed and use warm-color lights where practicable.</u></p>	<p>Comments received 7/31/25. In addition to protecting dark sky and aesthetic benefits, reasonable standards for exterior lighting also reduces energy usage and minimizes environmental impacts as well. These impacts emanate most profoundly from uncontrolled commercial and industrial development but can also be experienced significantly from residential development. This issue was discussed, but ultimately no change was directed by the Planning Commission (8/20/25).</p>
<p>45) Expressed concern about moisture loss and water resource use (e.g. pumping of ground water) on lands as outpacing glacial melt as leading cause of freshwater discharge to the world's oceans. The correspondence included a link to a report finding the same.</p>	<p>No policy recommendation.</p>	<p>Comments received 8/3/25. Climate Element policies 12.1 through 12.5 and 13.1 address the concerns expressed.</p>

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<p>46) Requests inclusion in the County's Climate Vulnerability Assessment. Recognize Clallam County's service availability as more appropriate given remoteness of western Jefferson County. Recognizes Tribe's vulnerability regarding risks to SR 101. Recognizes Tribe's risk to wildfires given lack of their own fire department. And dependency on PUD #1 of Clallam County as primary power service provider. Requests inclusion summarizing risks to Tribal lands.</p>	<p>Recommend amending the Clallam County Climate Vulnerability Assessment (CCCVA) to include the Hoh Nation as socially vulnerable community, including common risks affiliated with SR 101, wildfire, power service continuity, and nexus with Clallam emergency service providers. Note that the CCCVA is a plan-document for the updated Hazard Mitigation Plan. Any modification of the CCCVA will be for CPU purposes only, and will not impact the approved Hazard Mitigation Plan.</p>	<p>Tribal comments received from the Hoh Indian Tribe, 2/20/25.</p>
<p>47) Provided response of survey of Tribal citizens. Areas of concern include: need for all types of housing for all income levels, including transitional; reduce barriers to economic development in Forks; improve transportation services to Reservation lands; improve internet (broadband) and power service availability and outage response; improve provision of emergency services such as fire response; management of cultural and natural resources especially on timber lands; expand access to land to practice Treaty-reserved rights, including harvesting and hunting; protect & restore habitat degradation from logging; increase the amount of land devoted to cultural preservation and environmental protection; concerns about the range of potential climate change impacts; and the need to move to higher ground due to tsunami threats. Priorities are articulated to closely align with</p>	<p>Housing affordable to all income segments is addressed in the Housing Element of the Comprehensive Plan (CCC 31.02.290-.293) and will mostly impact housing availability within the Forks UGA. Economic development policies are established under CCC 31.02.720.</p> <p>Recommend amending CCC 31.02.420(3)(h) to read: "The supply of transit service shall be consistent with population and employment densities. More service should be provided to urban growth areas and the interconnection of urban growth areas, <u>tribal centers</u> and other population centers than to rural areas."</p> <p>Support for broadband service extension is provided for under CCC 31.02.720(4). Proposed Amendment to CCC 31.02.720(6), below, addresses concerns regarding power service resilience. Improved fire and emergency response are addressed under Climate Policy 8.1, 8.2, and 8.4. Concerns about protection of cultural and natural resources from climate-related</p>	<p>Tribal comments received from the Hoh Indian Tribe, 6/20/25.</p>

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<p>land use, transportation, public utilities, housing, and economic development. Natural environment and cultural resources should be protected.</p>	<p>risks are addressed under Climate Policy 4.1 and 4.2. Concerns regarding protecting and restoring habitat are addressed under CCC 31.02.340, and specifically under Subsection (7).</p>	<p>(see comments on same issue, above).</p>	<p>Tribal comments received from the Jamestown S’Klallam Tribe, 3/21/25.</p>
<p>48) Requesting holistic approach to low-bank shoreline armoring in eastern Clallam County. Concerns cite impacts of hard—armoring on sensitive beach environments subject to drift cell dynamics, and shifting erosion impacts to neighboring properties.</p>	<p>risks are addressed under Climate Policy 4.1 and 4.2. Concerns regarding protecting and restoring habitat are addressed under CCC 31.02.340, and specifically under Subsection (7).</p>	<p>(see comments on same issue, above).</p>	<p>Tribal comments received from the Quileute Tribal Council, 7/2/25. The prioritization of culvert and fish-barrier replacement will not only address identified issues impacting the health and survivability of anadromous fish species but also help to protect the County against legal action that could result without a deliberate prioritization of this issue (see United States V. Washington, Case No. 70-9213). Concerning other issues raised, several existing and proposed changes to the Comprehensive Plan already address the concerns identified.</p>
<p>49) Provided response of survey of Tribal citizens. In addition to identifying areas of concern, the response included a series of recommendations: Culverts resulting in fish barriers need to be addressed; Streamflow trends and climate change threaten salmon; invasive species pose a significant concern; Coastal tribes require finding to meet the challenges of climate change; inter-governmental coordination needs to be expanded; proximity and access to shoreline and marine amenities, cultural and natural resources should be protected; development should be appropriately located to avoid impacts; parks and recreational opportunities should be expanded and protected for all users; housing affordable to all income levels should be accelerated in existing urban centers; expand proper commercial siting to increase job opportunity while protecting natural and cultural amenities; Expand emergency, youth, seniors, and parks and</p>	<p>Recommend new subsection CCC 31.02.340(1)(f): <u>Clallam County shall prioritize culvert replacement and similar issues that presently result in barriers to fish passage as part of the Six-Year Transportation Improvement Plan (TIP) process.</u></p> <p>The broad list of other concerns expressed are specifically addressed under CCC 31.02.293, .340, .593, and .620 and Draft Climate Policies 4.1, 4.2, 7.1 through 7.5, and 8.1 through 8.5.</p>	<p>(see comments on same issue, above).</p>	<p>Tribal comments received from the Quileute Tribal Council, 7/2/25. The prioritization of culvert and fish-barrier replacement will not only address identified issues impacting the health and survivability of anadromous fish species but also help to protect the County against legal action that could result without a deliberate prioritization of this issue (see United States V. Washington, Case No. 70-9213). Concerning other issues raised, several existing and proposed changes to the Comprehensive Plan already address the concerns identified.</p>

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<p>recreational services; protect critical infrastructure; expand community engagement; and increase funding for supporting climate resiliency.</p>		
<p>50) Identified a lack of healthcare access in Forks and Sequim, for certain age groups, and concerns about the financial stability of OMC.</p>	<p>Recommend a new subsection CCC 31.02.820(11): Although not identified as a public facility under Table 12, above, given the fiscal challenges and decreasing availability of medical service facilities relative to population, Clallam County should explore opportunities and creative zoning solutions to facilitate the placement of medical service facilities throughout the County to closely align with community needs.</p>	<p>51 Respondents. Medical service facilities are listed as a permitted land use within all commercial zoning districts except Tourist Rural (TR). There exists ample capacity to accommodate existing and future facilities. Facility growth and funding adequate for their continued function is a matter beyond the scope of the Comprehensive Plan or development regulations. Draft language proposed in response to 8/20/2025 Planning Commission work session.</p>
<p>51) Need for economic development that supports living wage jobs including ecotourism, agritourism, technology, manufacturing and logging.</p>	<p>Expansion of technology sector policies is provided under Amendment to CCC 31.02.620(1)(j)(v), below. Modifications to the economic development policies of CCC 31.02.620, includes expansion of manufacturing, timber products, maritime and construction—all employment clusters determined by the EDC to include "prosperity-wage jobs." Support for agritourism already exists under CCC 31.02.115(5)(b).</p>	<p>39 Respondents.</p>
<p>52) Concerns over lack of childcare facilities and family-friendly activities, family wage jobs, all needed to support young families</p>	<p>No policy recommendation.</p>	<p>30 Respondents. Family day care providers (12 or fewer children) are allowed outright in most residential zones. Child daycare centers (unlimited) are allowed with a CUP in rural zones and allowed outright in all urban zones. Proposed economic policies are intended to integrate recommendations of EDC and NODC and are designed to stimulate business growth in sectors that support family-wage jobs.</p>
<p>53) Support for better Code enforcement for derelict houses, RVs, vehicles and garbage.</p>	<p>No policy recommendation.</p>	<p>16 Respondents. Draft RV Ordinance is in process and is intended to provide Code Enforcement broader tools designed to address proliferation of residential use of RVs and related impacts.</p>

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<p>54) Support and opposition expressed for addressing homelessness</p>	<p>No policy recommendation.</p>	<p>14 Respondents claim too many resources devoted, 13 Respondents claim not enough. Housing element (CCC 31.02.280 through .283) is intended to stimulate housing growth in all income brackets, including emergency shelters and emergency housing. Increases in housing stock and available no-cost and low-cost options will help address the concerns of this issue, and are mandated under the GMA.</p>
<p>55) Support for expanded and improved public beach access across the County</p>	<p>No policy recommendation.</p>	<p>13 Respondents. CCC 31.02.340(14) already contains very strong language regarding the identification and development of access points to the County's shoreline areas. No further policy is recommended.</p>
<p>56) Concern expressed over Tribal Trust Land removing land base from tax roles</p>	<p>No policy recommendation.</p>	<p>12 Respondents. See comments provided above regarding this issue.</p>
<p>57) Support expressed for Tribal community efforts, such as environmental restoration and community services.</p>	<p>No policy recommendation.</p>	<p>4 Respondents. Tribal partners do play a role in co-managing community resources and the provision of benefits to the broader community for tribal initiatives and community services. No additional policies are necessary for this work and continued collaboration on areas of mutual concern.</p>
<p>58) Concerns expressed over the conversion of farmland, development sprawl, and the need for development to be consolidated within UGAs.</p>	<p>No policy recommendation.</p>	<p>22 Respondents. The concerns expressed in these comments are addressed broadly and specifically under the Land Use, Rural Development and Housing Elements of the Comprehensive Plan. No further policy recommendations are warranted.</p>
<p>59) Support for glass recycling and commercial composting.</p>	<p>No policy recommendation.</p>	<p>10 Respondents. Composting and recycling, although convenient, are not identified under the definition for public services or public facilities (RCW 36.70A.030(32) & (33)). They are typically contracted services with for-profit companies. Currently, glass recycling does not produce a sustainable economic return and is likely not to be reestablished until favorable economic conditions</p>

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			reemerge. They are an available option within most commercial and industrial zones.
60) Support for a free community center that fosters arts and culture.	No policy recommendation.		7 Respondents. Planning Commission was concerned that need was not clearly established and did not wish to see the obligation memorialized.
61) Support for decreasing frequency/duration of power outages on the west end.	Recommend including a new subsection CCC 31.02.720(6) to include: <u>Policy 6. Power and utility service providers should be encouraged to integrate resiliency and redundancy in utility service extension design, where practicable, in order to avoid service outage, disruption, and duration.</u>		1 Respondent. Draft language incorporates concern and coincides with recommended Climate Element policies.
62) Increase transit service frequency and locations to include recreational areas.	No policy recommendation.		16 Respondents. Service routes and other provisions of Clallam Transit are established in the Clallam Transit System Comprehensive Transportation Plan. While the Comprehensive Plan incorporates portions of the Transit Plan, it is not appropriate for scheduling or service areas to be determined in the CPU.
63) Support for commercial passenger air service from Fairchild Int'l Airport to SeaTac and other regional airports.	No policy recommendation.		16 Respondents. CCC 31.02.420(4)(e) already articulates support for a passenger airline carrier to and from SeaTac.
64) Increase service times and expansion of Strait Shot commuter service.	No policy recommendation.		14 Respondents. See response to Comment 63, above.
65) Support for completing the Olympic Discovery Trail.	No policy recommendation.		8 Respondents. The Olympic Discovery Trail is already strongly supported in the Comprehensive Plan (CCC 31.02.415(6), .420(5)(b), and .441).
66) Support for Clallam Transit Free Transit Program and encouraging its continuance.	No policy recommendation.		8 Respondents. See response to Comment 63, above.

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<p>67) Support for more dedicated bike lanes on certain rural roads with reduced speed limits.</p>	<p>No policy recommendation.</p>	<p>5 Respondents. CCC 31.02.442 describes multiple bicycle routes along existing collector and arterial roads that provide linkage to SR 101 and the Olympic Discovery Trail along with dimensional criteria for improving safe bicycle access. Several of these projects have not yet been completed but remain a priority given their listing. Reducing speed limits involves a dedicated process including approval by the Board of County Commissioners.</p>
<p>68) Support for additional access points off the Peninsula, and support for bypassing choke points such as Port Angeles.</p>	<p>No policy recommendation.</p>	<p>4 Respondents. See response to Comment 14, above.</p>
<p>69) Support for form-based zoning in UGAs that prioritizes transit mobility, pedestrian and non-motorized access.</p>	<p>No policy recommendation.</p>	<p>4 Respondents. Several of the urban commercial zoning districts allow multi-use, integrated residential and commercial uses. In the more established residential neighborhoods, integrating commercial uses is less than ideal from a neighborhood character and identity standpoint.</p>
<p>70) Support for road and street repairs</p>	<p>No policy recommendation.</p>	<p>3 Respondents. Funding procedures for street repairs are already provided for under CCC 31.02.410.</p>
<p>71) Support for train access to I-5 Corridor</p>	<p>No policy recommendation.</p>	<p>3 Respondents. Train access would be desirable from a transportation and economic development standpoint. Unfortunately, former rights-of-way have been reverted back to private ownership and intervening development make re-establishment of train facilities impracticable.</p>
<p>72) Support for expanded sidewalk development.</p>	<p>No policy recommendation.</p>	<p>3 Respondents. Sidewalk implementation as a condition of new development and as a preferred design feature of public roads is already provided under CCC 31.02.420(5)(f) and (k).</p>
<p>73) Concerns regarding inability to use parks without feeling unsafe from proliferation of homeless people.</p>	<p>No policy recommendation</p>	<p>14 Respondents. The challenges of homelessness are addressed, in part, in the Housing Element and further supported under the Economic Development Element of the Comprehensive Plan. The</p>

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		<p>HH5 Five-Year Homelessness Plan also assists with the effort of getting unhoused people housed. Beyond these efforts, vagrant use of public spaces, such as parks, is a matter of law enforcement and not within the scope of the CPU.</p>
<p>74) Support for keeping County parks primitive and natural (undeveloped).</p>	<p>No policy recommendation.</p>	<p>6 Respondents. Development standards and design criteria for County parks are established within the Clallam County Parks and Recreation Comprehensive Master Plan. Although cited as a mandatory element under RCW 36.70A.070, in accordance with Subsection .070(10), and because state funding for the implementation of the Parks Master Plan has not been provided, parks and recreation is not required as part of the Comprehensive Plan. For that reason, there are no corollary policies regarding County parks in the Comprehensive Plan.</p>
<p>75) Support for more public restrooms.</p>	<p>No policy recommendation.</p>	<p>4 Respondents. Restroom facilities affiliated with recreational sites should be the function of the managing agency. This is not the function of the DCD nor is the Comprehensive Plan the appropriate place for consideration on this issue.</p>
<p>76) Support for turning abandoned mills into open space.</p>	<p>No policy recommendation.</p>	<p>4 Respondents. The creation of open space, while providing public benefits, does need to be balanced with other community needs, including economic development. Abandoned mills within residential or resource zoning districts may be good candidates for conversion to open space, while abandoned mills within the limited industrial land base should arguably be made available for reuse or redevelopment in kind in order to expand potential for prosperity-wage jobs.</p>
<p>77) Support for protecting existing trails and forests from logging.</p>	<p>No policy recommendation.</p>	<p>5 Respondents. The Comprehensive Plan recognizes and manages for the multiple users of commercial forest lands, including timber harvesting and recreation, among others (CCC 31.02.130(3)). Because of its importance to the local economy and for revenues to junior taxing districts, timber harvests will continue</p>

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		as valued users of our forest resources. At the same time, the Comprehensive Plan recognizes and supports development of outdoor recreational opportunities "...provided that the recreational activity is compatible with commercial timber harvest (CCC 31.02.140(6))."
78) Support for preservation of shoreline buffers and requiring that structures be moved instead of shore armoring	No policy recommendation.	3 Respondents. Shoreline buffers are managed through the Shoreline Master Program and not the Comprehensive Plan. Current rule making under the Department of Ecology instructs that moving a structure out of harms way is preferable to altering the shoreline environment with bulkheads or other revetments.
79) Support for ADA accessibility and variety in County parks	No policy recommendation.	3 Respondents. As noted earlier, park facility policy is adopted through the Clallam County Parks and Recreation Comprehensive Master Plan and is a focus separate from the CPU.
80) Support for more neighborhood County parks	No policy recommendation.	2 Respondents. As noted earlier, park facility policy is adopted through the Clallam County Parks and Recreation Comprehensive Master Plan and is a focus separate from the CPU.
81) Support for more parking at trailheads.	No policy recommendation.	2 Respondents. As noted earlier, park facility policy is adopted through the Clallam County Parks and Recreation Comprehensive Master Plan and is a focus separate from the CPU. Clallam County has no jurisdiction concerning state and federal parks.
82) Support and opposition to a campground at the proposed Miller Peninsula State Park.	No policy recommendation.	2 Respondents. The likely development of the Miller Peninsula State Park is recognized in the current Comprehensive Plan (CCC 31.03.415(6)(a)). Development of the park should require intersection improvements at Diamond Point Road and SR 101, and along Diamond Point Road (CCC 31.03.415(4)).
83) Demand for County to support skilled trades.	No policy recommendation	8 Respondents. CCC 31.02.610(8) identifies and supports a wide range of business sectors vital to the economic well-being of the County, including building trades, education, finance, forest

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		resources, Health services, information technology, marine services and tourism.
84) Support for more regulation of short-term rentals (STRs), with one asking for reduced regulation of STRs.	Recommend Amending CCC 31.02.281(4) to include a new subsection (k), as follows: <u>Clallam County should coordinate the monitoring of short-term rentals to determine the extent of the number of units operating within the County, and to what extent these units are impacting the price and availability of housing and rental stock.</u>	7 Respondents. There are strong opinions on the issue of short-term rentals (STRs). Many feel their presence substantially increases competition (and price) for limited housing and rental stock. Others see economic benefit through tourism dollars. Whether the situation requires a regulatory remedy depends on the extent of exactly how many units are operating in Clallam County (we don't fully know) and what impact, if any, these units are having with respect to limited, affordable housing. The recommended policy would provide guidance on a path forward.
85) Support for expansion of area grocery stores.	No policy recommendation.	4 Respondents. All but two of all commercial zones allow grocery stores outright. The development of grocery stores are not significantly restricted by regulations but are a matter of economics and demand.
86) Support for promoting Clallam County as a center for climate education and research.	Amend Resilience Sub-Element Overview to incorporate the following: <u>Clallam County is uniquely situated to both hedge against climate change impacts and provide real-time data on the impacts of climate change across all priority sectors. The Olympic Mountains, shorelines and riverine systems, extensive forest resource lands, differences in watershed dynamics and functions, and settlement patterns and built environment, make Clallam County an appropriate location for climate education and research. In recognition of the direct benefits to the community for science-based information, Clallam County should be promoted as a center for climate education and research.</u>	3 Respondents. The benefit to the community would be vetted information on not only climate impacts, but potential recommendations to achieve broader resilience. The Climate Element is divided among 11 priority sectors. However, education and research is a cross-cutting function, impacting all sectors. Suggest the recommended policy statement be incorporated at the end of the Resilience Sub-Element Overview.

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<p>87) Support for promoting tech industries in Clallam County</p>	<p>Recommend a new policy. CCC 31.02.620(1)(j)(vi): <u>Information and Technology.</u></p> <ul style="list-style-type: none"> • <u>Encourage and promote the development of high-tech industries in Clallam County.</u> • <u>Continue to support the extension and completion of broadband service throughout Clallam County.</u> • <u>Encourage and promote industries and businesses that support high-tech industry needs.</u> 	<p>2 Respondents. Currently, language supporting high-tech industry development is absent from economic development policies. Increased broadband internet and remote capability holds potential for future tech industry development, which could provide expanded economic opportunity.</p>
<p>88) Opposition to supporting measures towards climate change and climate resiliency.</p>	<p>No policy recommendation.</p>	<p>15 Respondents. The Climate element and corresponding policies are mandated under RCW 36.70A.020(14) and .070(9).</p>
<p>89) Support for prioritizing climate and environment.</p>	<p>No policy recommendation.</p>	<p>7 Respondents. Climate and environmental protection through critical areas policy, regulation, and adoption of the Shoreline Master Program, are already mandated under the GMA and addressed in the Draft CPU.</p>
<p>90) Concerns that climate regulation could make housing construction prohibitively expensive.</p>	<p>No policy recommendation.</p>	<p>5 Respondents. Policy 3.1 of the Climate Element recommends modification to building standards to reduce impacts of climate change. Such a change could increase the cost of construction; however, the cost of failure to keep pace with climate change could result in far greater cost in repairs, insurance premiums, or loss of insurance coverage. Requirements under the Wildlands Urban Interface legislation (RCW 19.27.560) will likely meet or exceed the implied requirements of this policy and will be mandated under state law.</p>
<p>91) Support for prioritizing water availability in development of new homes and parcels, including creation of a water steward position.</p>	<p>No policy recommendation.</p>	<p>5 Respondents. Goal 12 and policies 12.1 through 12.4 of the Draft Climate Element address these concerns. The implementation of a Water Steward position with the County was not included as a ballot measure by the Charter Review Commission.</p>

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92) Support for protecting and restoration of ecological resources that aid in climate resilience, including old-growth forests.	No policy recommendation.	3 Respondents. Draft Climate Element policies 4.1, 7.1 and 7.3 through 7.5 address the stated concerns.
93) Focus on natural disaster preparedness such as Cascadia earthquake.	No policy recommendation.	2 Respondents. The Clallam County Hazard Mitigation Plan was recently approved by FEMA and addresses the concerns expressed.
94) Support regulations that prevent development in high risk and environmentally sensitive areas.	No policy recommendations.	2 Respondents. The requirements of the Critical Areas Ordinance and Shoreline Master Program address several issue areas related to this concern. Additionally, Draft Climate policies 13.1 through 13.3 provide an additional framework for considering increased flood, wildfire, and other climate-related risks.
95) Supports County use of electric vehicles	<p>Recommend a new subsection CCC 31.02.820(2)(c): <u>Although Clallam County is not required under House Bill 1181 to reduce greenhouse gas emissions, opportunities to take such measures would nevertheless be in the public interest and could improve resiliency. Therefore, with increased resiliency in energy generation and transmission, the County should explore grant funding and other resources for the transition of the County vehicle fleet from gas/diesel-powered to electric-powered or other renewable energy sources, where feasible and practicable. The same should be pursued concerning gas-powered maintenance equipment.</u></p>	2 Respondents. More detailed language was derived by Planning Commission that amends includes a new Subsection CCC 31.02.820(2)(c)(see Planning Commission Recommended Policy #8).
96) More affordable housing including high-density housing and housing that targets seniors, youths, students, and the disabled.	No policy recommendation.	58 Respondents. The new housing element, predicated on the land capacity analysis completed for the CPU, addresses the concerns expressed within the capabilities of the Department.
97) Supports shift from extraction-based economy to a tourism-based economy.	No policy recommendation.	5 Respondents. Consistent with the EDC's Five-Year Economic Plan, economic development policies being recommended under

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		the CPU, among others, recommends and supports focus on four "prosperity clusters" for promoting economic development: maritime, manufacturing, timber products, and construction. Tourism, while good for the business owner, does not typically provide prosperity-wage jobs. Policies that would diminish prosperity wage jobs would be counter-productive with this focus and is not recommended.
98) Support for expanded multi (mixed)-use buildings.	No policy recommendation.	3 Respondents. Mixed-use buildings, including a range of commercial and urban-density residential, are already allowed under most urban-commercial zoning districts. Policy support is already established under CCC 31.02.281(4)(b) & (g).
99) Support for improved internet access.	No policy recommendation.	2 Respondents. See response to Comment 88, above.
100) Support for a moratorium on large housing developments.	No policy recommendation.	2 Respondents. In order to meet our housing objectives and improve the stark housing shortage that currently exists, new housing must be created.
101) Support for a more circular, local economy.	No policy recommendation.	1 Respondent. Policies promoting agricultural products development and economic policies focusing on prosperity-wage employment clusters will help to increase economic growth, promote local products, and generate economic relationships that strengthen the local economy. Further policies are not recommended.
102) Support for residential occupancy of RVs.	No policy recommendation.	1 Respondent. The RV Use Ordinance, currently in process, addresses the concerns related to this matter. No further policy is recommended.
103) Support for reducing permitting time and costs.	No policy recommendation.	1 Respondent. Clallam County updated its Fee Schedule Ordinance in 2024. Building and Planning fees were brought into a range comparable with the aggregate of six comparable county jurisdictions. As a percentage of over-all project costs, County

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		<p>permitting fees remain affordable and do not presently represent a significant deterrent to development.</p>
104) Assist the subdivision of property with grants to pay for water and sewer.	No policy recommendation.	<p>1 Respondent. The provision of sewer and water services are important to future growth and development, especially in presently unserved, unincorporated UGAs. However, such projects have to be approached from a regional perspective. Obtaining grants, if possible, for individual projects, would constitute use of public funds for personal gain, which is not allowed.</p>
105) Create neighborhood centers that do not require access to SR 101.	No policy recommended.	<p>1 Respondent. Historic development patterns typically coincide with the highway corridors of SR 101 and SR 112. Under the GMA, "neighborhood centers" fall under one of two categories: UGAs or Local Areas of More Intense Rural Development (LAMIRDS). The designation of both are dependent, in part, on the historic development patterns that existed with the passage of the GMA (1990). The Transportation Element does include policies intended to reduce reliance on direct highway access, but in large part, that is where our urban and rural centers are located as a historic reality.</p>
106) Limit growth on the east side of the County to within City limits only.	No policy recommendation.	<p>1 Respondent. There is no reasonable mechanism for achieving this desired outcome.</p>
107) Improve bike access and network of bike rentals.	No policy recommendation.	<p>1 Respondent. The Bicycle Plan establishes routes designated for bicycle corridors (CCC 31.02.442, and subregional plans). Several of these routes coincide with urban and rural centers that provide opportunity for bicycle rentals. The expansion of rental opportunities are more a function of economic demand than lack of policy.</p>
108) Tax home vacancies.	No policy recommendation.	<p>1 Respondent. See response to Comment 6, above.</p>

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109) Improve day care availability.	No policy recommendation.	1 Respondent. As noted above, family day care providers (12 or fewer children) are allowed outright in most residential zones. Child daycare centers (unlimited) are allowed with a CUP in rural zones and allowed outright in all urban zones. The development of new daycare facilities are more a function of economic demand than lack of policy.
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The above suggested policies have been included as a means of addressing comments received within the framework and requirements mandated by the Growth Management Act and that are internally consistent with other requirements of the Comprehensive Plan. They are not intended as the only alternatives available.

If you have any questions regarding this information, please contact me at 360-417-2323 or at bruce.emery@clallamcountywa.gov.

Sincerely,

Bruce Emery, Director
Clallam County DCD