

AGENDA

Clallam County Planning Commission

Planning Commission Meeting of Wednesday, February 4, 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:** January 21, 2026
- F. ANNOUNCEMENTS:**
- 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, Katina Hester
Warren Billups; Thomas Butler;
Jane Hielman; Ron Long; Kenneth Reandeau; Janice Wilson; Vacancy
Department of Community Development Staff:
Donella Clark, Principal Planner; Bruce Emery, DCD Director

MINUTES

Clallam County Planning Commission

Meeting of January 21, 2026, 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, Tom Butler, Janice Wilson, Ron Long, and Jane Hielman. Bruce Emery, Director and Donella Clark, Principal Planner, represented staff from the Department of Community Development.
- D. WELCOME: Chair Gale welcomed the Commissioners. No public were present at the meeting.
- E. APPROVAL OF MINUTES: Commissioner Long moved to approve the minutes. Commissioner Wilson seconded. Motion passed, none opposed.
- F. ANNOUNCEMENTS: Update on RV Ordinance that was discussed at the Board of Commissioners meeting. Substantial misinformation against the proposed ordinance was voiced in the three hour meeting. The Commissioners remanded the code back to staff. Director Emery noted he will be removing the ADU standards and inserting them in the proposed zoning changes associated with the Comprehensive Plan update. The hope is to salvage the ordinance. Chair Gale informed staff that the ordinance is too important not to get done so bringing it back to the Planning Commission would be supported. Commissioner Butler noted that it did not seem people had read the language proposed and would suggest simplifying the codes or providing a summary on one page. Commissioner Reandeau noted it would be nice to bring the public into the conversation if it is returned to the Planning Commission.
- G. PUBLIC COMMENT PERIOD: None.
- H. UNFINISHED BUSINESS: None.
- I. PUBLIC HEARING ITEM: Two letters of comment were presented to the Commissioners. Commissioner Reandeau believes the comment regarding hosting on agricultural lands is not necessary to take up at this time since it was discussed during the adoption of the ag accessory ordinance. The hearing will be continued until the next meeting.
- J. WORK SESSION ITEMS: Discussion began with the proposed rezones in Sequim. The target based on growth projections is 147 housing units. Commission discussed several neighborhoods and chose neighborhoods 5 and 16 to be upzoned to SR-III. Clallam Bay zoning changes are more of an opportunity to allow different types of development since we are not expecting growth in the area. The areas in Clallam Bay and Sekiu are proposed to be rezoned to Moderate Density which is a zone existing in the Port Angeles Urban Growth Area and will allow up to 15 acres to acre to be developed.

The Commission then went on to discuss the Sequim Valley Airport. Andy Salee had requested an expansion in Zone 3 of the airport to include transient accommodations. Commission Butler wondered if there was an actual need for accommodations or just a desire to make money. Proposed language proposed will be followed up with regulations. The policy is intended to set up the department to look into regulations. Commissioners recommended the policy and to take up the zoning later.

The transportation element was reviewed. Map shows the intersections in Sequim where the changes to zoning will occur and shows that the intersections will not be affected much. Comments on proposed changes regarding escort tugs was discussed. Changes as proposed for the rest of 31.02.410 were accepted.

Next, the Commission discussed the public comments in Table 3, evaluating the suggested and determining acceptance or recommending changes. Continued work through Table 3 will occur at the next meeting. Commissioner Long motioned to continue the hearing until 2-4-26 and Commissioner Butler seconded. Motion passed with none opposed.

K. PUBLIC COMMENT PERIOD: None.

L. DISCUSSION OF PUBLIC COMMENTS: None.

M. GOOD OF THE ORDER: None.

N. ADJOURNMENT: The meeting adjourned at __8:20 p.m.____

Clark, Donella

From: Ginger Wierzbowski <gwierzbo@gmail.com>
Sent: Tuesday, January 20, 2026 10:11 AM
To: Clark, Donella
Subject: Fwd: Upcoming discussions and hearings on land use in Clallam county

You don't often get email from gwierzbo@gmail.com. [Learn why this is important](#)

Donella,

Please see below provided for upcoming hearings.

Ginger
Sent from my iPhone

Begin forwarded message:

From: Ginger Wierzbowski <info@olympicbluffs.com>
Date: January 20, 2026 at 10:06:42 AM PST
To: Randy Johnson <Rjohnson@co.clallam.wa.us>
Cc: Ginger Wierzbowski <gwierzbo@gmail.com>
Subject: **Upcoming discussions and hearings on land use in Clallam county**

Clallam County Board of Commissioners
Clallam County Department of Community Development
Port Angeles, WA

Dear Commissioners and Community Development Staff,

I am writing to provide economic benefit examples in support of allowing and encouraging Harvest Hosts–style overnight stays as a low-impact agritourism activity for agricultural businesses in Clallam County. As you may know, Harvest Hosts guests are encouraged to spend at least \$30 during their stay. Their comments/reviews on their farm stay experiences help to quickly build up the brand and reputation for small farm based businesses. Clallam County benefits by receiving 2.1% of every sale of these farm products. These sales also help small businesses grow and result in increased job opportunities for locals.

A well-documented comparison can be found in Oregon's Willamette Valley region, which spans multiple counties including Benton, Lane, Marion, and Yamhill. These counties explicitly support agritourism activities such as on-farm sales, tasting rooms, tours, events, and limited overnight farm stays. While not all stays are branded as "Harvest Hosts," the land-use model and impacts are directly comparable.

According to an Oregon State University Extension economic impact study, agritourism and related on-farm hospitality activities in the Willamette Valley generate approximately \$985 million in direct sales, contribute over \$570 million in value-added economic activity, and support roughly 11,000 jobs across the region. These benefits accrue not only to farms, but also to surrounding communities through increased spending at restaurants, gas stations, retail shops, and local attractions.

From a public finance perspective, these activities expand county and state revenues through:

- Sales tax generated by visitor spending
- Business and B&O tax contributions from farm-based enterprises
- Increased local employment and associated tax revenues
- Greater economic resilience of agricultural lands, reducing pressure for subdivision or rezoning

Importantly, these economic benefits have been achieved without converting farmland to commercial campgrounds or intensive lodging uses. Overnight agritourism stays in Oregon are typically short-term, limited in scale, and designed to remain clearly accessory to ongoing agricultural production.

Programs like Harvest Hosts create similar outcomes on a smaller, highly controlled scale. Guests are fully self-contained, stays are typically one night, and participation encourages direct purchases from the host farm. In addition, overnight agritourism visitors frequently spend money elsewhere in the county, benefiting neighboring businesses and communities.

Clallam County shares many characteristics with the Willamette Valley: working farms, value-added agricultural producers, scenic rural landscapes, and visitors seeking authentic agricultural experiences. Allowing clearly defined, low-impact overnight agritourism uses would support farm viability, strengthen the rural economy, and align with broader economic development and land-preservation goals.

I respectfully encourage the County to look to Oregon's agritourism framework as a successful precedent and to explicitly recognize Harvest Hosts-style overnight stays as an accessory agricultural use when appropriately limited in frequency and duration.

Thank you for your time and consideration, and for your continued support of agriculture and rural communities in Clallam County.

Sincerely,

Ginger Wierzbanowski

Olympic Bluffs Cidery & Lavender Farm

Salt & Cedar Bed & Breakfast

Clallam County, Washington

Sent from my iPhone

Clark, Donella

From: Emery, Bruce
Sent: Wednesday, January 21, 2026 4:32 PM
To: Clark, Donella
Subject: FW: CC Planning Commission Public Hearing 1-21-26 RE: CC-CP Update -Public Comment for the Record

CPU Testimony, below.

-----Original Message-----

From: larjdyng@olyphen.com <larjdyng@olyphen.com>
Sent: Wednesday, January 21, 2026 4:23 PM
To: Emery, Bruce <Bruce.Emery@clallamcountywa.gov>; larjdyng@olyphen.com
Subject: CC Planning Commission Public Hearing 1-21-26 RE: CC-CP Update -Public Comment for the Record

[You don't often get email from larjdyng@olyphen.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

----- Original Message -----

Subject: CC Planning Commission Public Hearing 1-21-26 RE: CC-CP Update -Public Comment for the Record
Date: 2026-01-21 16:17
From: larjdyng@olyphen.com
To: larjdyng@olyphen.com

----- Original Message -----

Subject: CC Planning Commission Public Hearing 1-21-26 RE: CC-CP Update -Public Comment for the Record
Date: 2026-01-21 15:10
From: larjdyng@olyphen.com
To: larjdyng@olyphen.com

Attention: CC Planning Commissioners

Please accept this Public Comment for the CC-CP Update Record from:
Judy Larson, resident of 1070 W Palo Verde Loop, Sequim,WA since 1993.

On 1-14-26, DCD Director Bruce Emery responded to my message that the NOLS Reference Librarian had NOT received printed copies of CC-CP Update materials for the Library branches. (On 1-7-26 I had called DCD when Sequim Library staff were unable to find such materials, and Bruce stated he believed hard copies HAD been delivered for public review - as has been done in past CP Update efforts.) In his 1-14 call, he noted that I could still make public comments for your extended Public Hearing today, but that I would need to find the CP Update materials online at: clallamcountywa.gov/1822/comprehensive-plan-update.

I certainly appreciate his providing this information and that he also said he suspected you would continue your Public Hearing through at least 2-4-26.

Please know that I do hope you will continue your good efforts through at least this date.

1) FOR the record, I note how difficult it is to try to read the online materials that have confusing highlighting, "line-outs," red revisions... Much of the material-especially in tables and for Section (re)numbering is unreadable!

2)The demographics of our County indicate that it is likely we have fewer stakeholders who have online access. The 31.01.200 overview item

(11) "Citizen participation and coordination" supports the need to provide hard copies in Libraries.

Because ongoing family health needs/circumstances affect my schedule, and a personal computer problem has prevented me from participating by zoom, I have now had to borrow a laptop from a good friend to be able to access the CP Update materials and send these public comments.

3) I was able to attend in person the 7-23-25 Public Meeting in Sequim and was told by Bruce that comments/concerns about how the new GMA element for Climate Change & Resiliency (per HB1181) could address critical area protections - especially wildlife corridors and aquifer recharge needs - specific concerns I voiced. He said this comment was included in the meeting's record.

I have yet to locate that record, but have read:

31.01 (10pp), 31.02 (283pp), 31.03 (116pp), Appendix K (105pp), Land Capacity Analysis 11-4-25 (30pp), Demographic Profile 2024 (24pp).

I have made many notes of concern as I read, but clearly cannot AT THIS TIME include all of them. Also, when I do try to reference a section by a cited page, I am not sure this computer's paging matches another's or would match a hard copy paging!

Because I am a rural land owner with a shallow exempt well and a Protect the Peninsula's Future member (and a past president and DRMT delegate), I pay special attention to land use, and environmental/ quality of life issues/policies. Thus far, I find the CP Update:

*4) does not adequately address 31.01.200 item 10... "and the availability of water."

31.03 discussion of (5) & (6) has no mention of exempt wells or OSS.

*5) 31.02 Environment & Open Space (7) Habitat - does not show concerns many have expressed at CCD meetings about the need to "protect, connect & enhance habitat corridors... maintained as important community infrastructure (like Sequim Prairie first irrigation ditch!!) to promote wildlife diversity across connected landscapes.

*6) 31.02.30 has also been ignored by County's Heritage Committee for protecting this SP ditch from piping.

*7) 31.03.455 This has several areas still needing review/ updating.

I must end now to allow these concerns to have your consideration, and if given more time will try to provide additional inputs.

Thank you for your attention and considerable investment of your time to our County's needs.

Respectfully,
Judy Larson



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

Memorandum

Date: January 28, 2026
To: Clallam County Planning Commission
From: Bruce Emery, Director of Community Development
Re: Planning Commission CPU Continued Public Hearing, 02/04/2026

Hello Planning Commission Members. The public hearing for the CPU will continue on February 4, 2026. I look forward to continuing the good work on the Public Testimony (Table 3), Commerce Checklist response (Table 4), and the draft text changes to the Zoning Code.

Table 3, Policy Response to Public Testimony. Updated Table 3 includes changes directed by the Planning Commission during the 1/21/26 meeting. These include changes on pages 24 through 30, and page 33. I have also incorporated responses to the last two letters of testimony received (Testimony #26 and #27). These letters were distributed during the 1/21/26 meeting and are also included in your packet. If you are satisfied with the changes made, I suggest we begin on Page 31 and continue to work through the draft policy edits.

Table 4, Policy Response to Commerce Checklist. Both Table 4 and the Commerce Checklist have been updated and are included in your packet for review. To reiterate, the Commerce Checklist was prepared by the Washington Department of Commerce as a high level "gap analysis" for what is needed to bring the Comprehensive Plan and development regulations into GMA compliance. Recommended responses to each item are highlighted in red underscore. As you can see by the breadth of the document, the requirements are many. We have reviewed this document and our responses (Table 4) with the consultants. There continues to be six items for which we need assistance in completing. The contract with the consultants was extended last week and I remain hopeful we will have those responses by next Wednesday's meeting.

Zoning Text Changes. The proposed changes to the text of the Zoning Code are included in your packet. The revised draft (1/23/2026) has been expanded to incorporate most of the accessory dwelling unit changes and some of the definition changes that were included in the RV Use Ordinance project. With that project being reworked, it is critical that those elements required under the GMA be incorporated into the Comprehensive Plan Update process so that they can be adopted concurrent with the CPU. These additional items were already reviewed by the Planning Commission earlier in 2025 and were part of the Commission's recommendations to the BOCC.

Thank you all again for your dedication and hard work. Because of that work, we are getting close to completion. 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: Letters of Testimony (2)
 Revised Sequim Zoning Change Maps (2)
 Table 3, Policy Response to Public Testimony, updated
 Table 4, Policy Response to Commerce Checklist
 Commerce Checklist, updated
 Zoning text amendments

Emery, Bruce

From: Clark, Donella
Sent: Wednesday, January 21, 2026 8:26 AM
To: Emery, Bruce
Subject: FW: Upcoming discussions and hearings on land use in Clallam county

I'm not sure what hearing they are attending to discuss this comment, and didn't see you cc'd.
-Donella

From: Ginger Wierzbanowski <gwierzbo@gmail.com>
Sent: Tuesday, January 20, 2026 10:11 AM
To: Clark, Donella <donella.clark@clallamcountywa.gov>
Subject: Fwd: Upcoming discussions and hearings on land use in Clallam county

IMPROVING You don't often get email from gwierzbo@gmail.com. [Learn why this is important](#)

Donella,

Please see below provided for upcoming hearings.

Ginger
Sent from my iPhone

Begin forwarded message:

From: Ginger Wierzbanowski <info@olympicbluffs.com>
Date: January 20, 2026 at 10:06:42 AM PST
To: Randy Johnson <Rjohnson@co.clallam.wa.us>
Cc: Ginger Wierzbanowski <gwierzbo@gmail.com>
Subject: **Upcoming discussions and hearings on land use in Clallam county**

Clallam County Board of Commissioners
Clallam County Department of Community Development
Port Angeles, WA

Dear Commissioners and Community Development Staff,

I am writing to provide economic benefit examples in support of allowing and encouraging Harvest Hosts-style overnight stays as a low-impact agritourism activity for agricultural businesses in Clallam County. As you may know, Harvest Hosts guests are encouraged to spend at least \$30 during

their stay. Their comments/reviews on their farm stay experiences help to quickly build up the brand and reputation for small farm based businesses. Clallam County benefits by receiving 2.1% of every sale of these farm products. These sales also help small businesses grow and result in increased job opportunities for locals.

A well-documented comparison can be found in Oregon's Willamette Valley region, which spans multiple counties including Benton, Lane, Marion, and Yamhill. These counties explicitly support agritourism activities such as on-farm sales, tasting rooms, tours, events, and limited overnight farm stays. While not all stays are branded as "Harvest Hosts," the land-use model and impacts are directly comparable.

According to an Oregon State University Extension economic impact study, agritourism and related on-farm hospitality activities in the Willamette Valley generate approximately \$985 million in direct sales, contribute over \$570 million in value-added economic activity, and support roughly 11,000 jobs across the region. These benefits accrue not only to farms, but also to surrounding communities through increased spending at restaurants, gas stations, retail shops, and local attractions.

From a public finance perspective, these activities expand county and state revenues through:

- Sales tax generated by visitor spending
- Business and B&O tax contributions from farm-based enterprises
- Increased local employment and associated tax revenues
- Greater economic resilience of agricultural lands, reducing pressure for subdivision or rezoning

Importantly, these economic benefits have been achieved without converting farmland to commercial campgrounds or intensive lodging uses. Overnight agritourism stays in Oregon are typically short-term, limited in scale, and designed to remain clearly accessory to ongoing agricultural production.

Programs like Harvest Hosts create similar outcomes on a smaller, highly controlled scale. Guests are fully self-contained, stays are typically one night, and participation encourages direct purchases from the host farm. In addition, overnight agritourism visitors frequently spend money elsewhere in the county, benefiting neighboring businesses and communities.

Clallam County shares many characteristics with the Willamette Valley: working farms, value-added agricultural producers, scenic rural landscapes, and visitors seeking authentic agricultural experiences. Allowing clearly defined, low-impact overnight agritourism uses would support farm viability, strengthen the rural economy, and align with broader economic development and land-preservation goals.

I respectfully encourage the County to look to Oregon's agritourism framework as a successful precedent and to explicitly recognize Harvest Hosts-style overnight stays as an accessory agricultural use when appropriately limited in frequency and duration.

Thank you for your time and consideration, and for your continued support of agriculture and rural communities in Clallam County.

Sincerely,

Ginger Wierzbanski

Olympic Bluffs Cidery & Lavender Farm

Salt & Cedar Bed & Breakfast

Clallam County, Washington

Sent from my iPhone

Emery, Bruce

From: larjdyng@olympen.com
Sent: Wednesday, January 21, 2026 4:23 PM
To: Emery, Bruce; larjdyng@olympen.com
Subject: CC Planning Commission Public Hearing 1-21-26 RE: CC-CP Update -Public Comment for the Record

[You don't often get email from larjdyng@olympen.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

----- Original Message -----

Subject: CC Planning Commission Public Hearing 1-21-26 RE: CC-CP Update -Public Comment for the Record
Date: 2026-01-21 16:17
From: larjdyng@olympen.com
To: larjdyng@olympen.com

----- Original Message -----

Subject: CC Planning Commission Public Hearing 1-21-26 RE: CC-CP Update -Public Comment for the Record
Date: 2026-01-21 15:10
From: larjdyng@olympen.com
To: larjdyng@olympen.com

Attention: CC Planning Commissioners

Please accept this Public Comment for the CC-CP Update Record from:
Judy Larson, resident of 1070 W Palo Verde Loop, Sequim,WA since 1993.

On 1-14-26, DCD Director Bruce Emery responded to my message that the NOLS Reference Librarian had NOT received printed copies of CC-CP Update materials for the Library branches. (On 1-7-26 I had called DCD when Sequim Library staff were unable to find such materials, and Bruce stated he believed hard copies HAD been delivered for public review - as has been done in past CP Update efforts.) In his 1-14 call, he noted that I could still make public comments for your extended Public Hearing today, but that I would need to find the CP Update materials online at: clallamcountywa.gov/1822/comprehensive-plan-update.

I certainly appreciate his providing this information and that he also said he suspected you would continue your Public Hearing through at least 2-4-26.

Please know that I do hope you will continue your good efforts through at least this date.

- 1) FOR the record, I note how difficult it is to try to read the online materials that have confusing highlighting, "line-outs," red revisions... Much of the material-especially in tables and for Section (re)numbering is unreadable!
- 2)The demographics of our County indicate that it is likely we have fewer stakeholders who have online access. The 31.01.200 overview item
- (11) "Citizen participation and coordination" supports the need to provide hard copies in Libraries.

Because ongoing family health needs/circumstances affect my schedule, and a personal computer problem has prevented me from participating by zoom, I have now had to borrow a laptop from a good friend to be able to access the CP Update materials and send these public comments.

3) I was able to attend in person the 7-23-25 Public Meeting in Sequim and was told by Bruce that comments/concerns about how the new GMA element for Climate Change & Resiliency (per HB1181)could address critical area protections -

especially wildlife corridors and aquifer recharge needs -specific concerns I voiced. He said this comment was included in the meeting's record.

I have yet to locate that record, but have read:

31.01 (10pp), 31.02 (283pp), 31.03 (116pp), Appendix K (105pp), Land Capacity Analysis 11-4-25 (30pp), Demographic Profile 2024 (24pp).

I have made many notes of concern as I read, but clearly cannot AT THIS TIME include all of them. Also, when I do try to reference a section by a cited page, I am not sure this computer's paging matches another's or would match a hard copy paging!

Because I am a rural land owner with a shallow exempt well and a Protect the Peninsula's Future member (and a past president and DRMT delegate), I pay special attention to land use, and environmental/ quality of life issues/policies. Thus far, I find the CP Update:

*4) does not adequately address 31.01.200 item 10... "and the availability of water."

31.03 discussion of (5) & (6) has no mention of exempt wells or OSS.

*5) 31.02 Environment & Open Space (7) Habitat - does not show concerns many have expressed at CCD meetings about the need to "protect, connect & enhance habitat corridors... maintained as important community infrastructure (like Sequim Prairie first irrigation ditch!!) to promote wildlife diversity across connected landscapes.

*6) 31..02.30 has also been ignored by County's Heritage Committee for protecting this SP ditch from piping.

*7) 31.03.455 This has several areas still needing review/ updating.

I must end now to allow these concerns to have your consideration, and if given more time will try to provide additional inputs.

Thank you for your attention and considerable investment of your time to our County's needs.

Respectfully,
Judy Larson

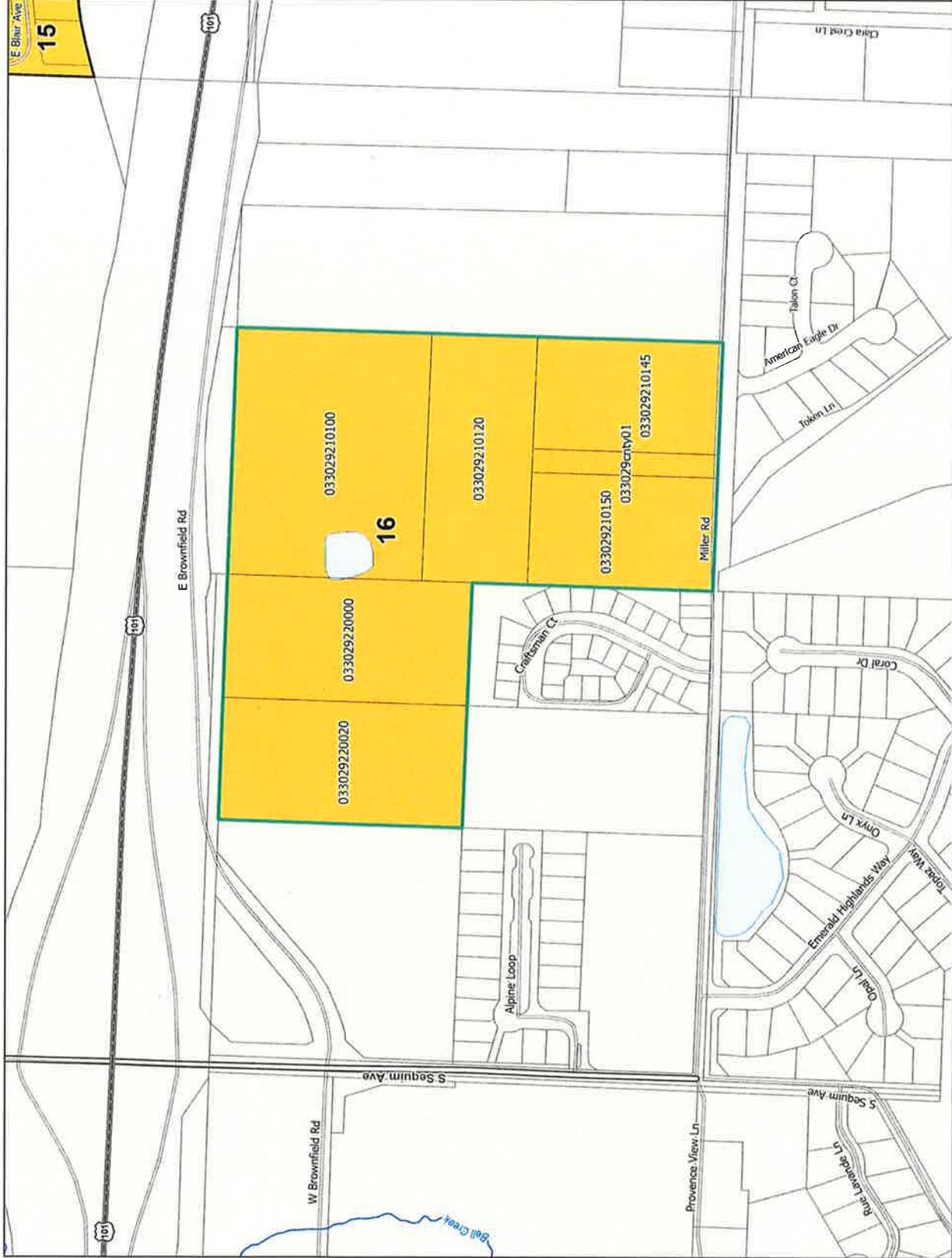
Exhibit C Reference Map

Amending Title 31, Generalized Zoning and Future Land Use Map- Sequim Urban Growth Area- 30.1 acres Sequim Urban Residential II (S(R-II)) to Sequim Urban Growth Area Urban Residential III (S(R-III))

- Redesignate S(R-II) to S(R-III)
- Zone S(R-II) Parcels
- Urban Growth Area
- Incorporated City of Sequim
- City Limits
- Streams



0 0.5 1 Miles



CPU Policy Response Table 3: Public/Agency Testimony

Clallam County Comprehensive Plan Update Summary of Public Testimony and Corresponding Recommendations as of January 22, 2026.

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>

CPU Policy Response Table 3: Public/Agency Testimony

<p>consistent with the 6-Year TIP that includes a project for a "Preliminary Study for Neah Bay to Forks Road."</p>	<p>Suggested Language: <u>"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>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.</p> <p>Suggested language: <u>"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>Recommended Policy, Planning Commission Recommendation # 6, CCC 31.02.420(1)(a)(vi): <u>"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 utilized 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>Consider new Section 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 following implementation of increased resiliency in energy generation and transmission, the County should explore grant funding and other resources for the transition of the County's small vehicle fleet</u></p>

CPU Policy Response Table 3: Public/Agency Testimony

<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. 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 commercial</u>suitable 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>

CPU Policy Response Table 3: Public/Agency Testimony

<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 mitigated<u>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 and result in <u>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 adequate 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</u>mitigated.”</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. j) 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 prevent additional listing <u>proactively protect populations</u> of fish, wildlife and plants under the Endangered Species Act through pro-active (rather than reactive)</p>

CPU Policy Response Table 3: Public/Agency Testimony

<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>planning and implementation of proper land use practices <u>and conservation measures.</u> ”</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: “...locate and ensure <u>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(1)(f). “Clallam County shall prioritize culvert replacement and similar issues that presently result in identifying and removing barriers to fish passage including undersized or degraded culverts 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>Proposed edits to CCC 31.02.340(6).</p> <p>(a) <i>Policy 16.</i> “Clallam County should<u>will</u> work to implement<u>achieve</u> 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 <u>life 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>(c) <i>(New Policy 18).</i> <u>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>

CPU Policy Response Table 3: Public/Agency Testimony

	<p>areas should be maintained as important community infrastructure <u>and to promote wildlife diversity across connected landscapes.</u>"</p>
<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>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 reserve<u>preserve</u> ecological and community benefits <u>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 habitat 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>Washington Department of Wildlife 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>

CPU Policy Response Table 3: Public/Agency Testimony

<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</u>" means the fair treatment and meaningful involvement of all people regardless of race, color, national origin, tribal affiliation, disability</p>

CPU Policy Response Table 3: Public/Agency Testimony

<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, give 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>

CPU Policy Response Table 3: Public/Agency Testimony

	<p>value ecosystem services (e.g. natural flood control, water storage, water filtration), wildlife corridors, shorelines and riparian areas.”</p>
<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>Propose new Section CCC 31.02.250(1)(k): “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.”</p> <p>Propose edits to Section CCC 31.02.250(1)(g): “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.”</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 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): “Prevention is less expensive than cleaning/reversing up pollution and ecosystem impacts later. Clallam County should consider the potential impacts and costs of treatment, or remediation and restoration for of environmental degradation resulting from land use practices, before such practices are allowed.”</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>

CPU Policy Response Table 3: Public/Agency Testimony

<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.” • 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> <ol 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>	

CPU Policy Response Table 3: Public/Agency Testimony

<ul style="list-style-type: none"> 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, 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 	<p>Proposed new Section 31.02.820(1)(e): "<u>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.</u>"</p> <p>Propose amending Section 31.02.820(1)(a): "<u>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.</u>"</p> <p>Propose amending Section 31.02.820(1)(c): "... Encourage farmers to adopt sustainable business practices, such as regenerative farming, water storage, <u>shift to high-value/low water-use crops,</u> and upgrading irrigation..."</p> <p>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 <u>preserving</u></p>
--	--

CPU Policy Response Table 3: Public/Agency Testimony

<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><u>and increasing tree cover, and adding shade structures and other passive cooling designs.”</u></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 plans to protect salmonid habitats (transportation, water, sewer, electricity <u>and zoning</u>) <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): “<i>Policy 7.1</i>: Prepare ecosystems for climate impacts by implementing restoration actions for streams, wetlands, and watersheds, focusing on <u>habitat</u> 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, addressing<u>adapting to</u> sea-level rise, and focusing on submerged aquatic vegetation <u>and shellfish restoration</u> for habitat and “blue” carbon storage. Evaluate shoreline restoration and cleanup efforts, including concerns for Tribal cultural resources.”</p>
--	--

CPU Policy Response Table 3: Public/Agency Testimony

<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): “<i>Policy 7.2: Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate <u>change-mitigating systems</u>refugia and avoiding habitats <u>that provide valuable ecosystem services</u>. At a minimum, <u>ensure to strive for</u> no net loss of ecosystem <u>functions</u>attributes, with a focus on achieving net ecological gains...”</i></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. 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> Promote incentives for sustainable food cultivation.”</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, <u>and improving wastewater access routes, and expanding water reuse by publicly owned treatment facilities.</u>”</p>
---	---

CPU Policy Response Table 3: Public/Agency Testimony

<p>10.f) Jamestown S'Klallam Tribe, November 19, 2025. Amend Sequim-Dungeness Regional Plan (CCC 31.03.455):</p> <p>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.</p> <p><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> <p><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></p> <p><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></p> <p><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></p> <p><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></p>
---	--

CPU Policy Response Table 3: Public/Agency Testimony

	<p><u>201(2)(c) for unavoidable impacts from shore protection measures and development.</u></p>
<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>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 policies 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>

CPU Policy Response Table 3: Public/Agency Testimony

<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>“(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>
<p>Propose amending 31.02.350(2): “Clallam County shall recognize tribal nations 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.”</p>	<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>“(b) Sites and resources having known 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, known 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 suspected, then a survey should be conducted by an archaeologist.</p> <p>(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.</p> <p>(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.”</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>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</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>[Change rejected by Planning Commission, 1/7/2026.]</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>

CPU Policy Response Table 3: Public/Agency Testimony

<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 losses 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.

CPU Policy Response Table 3: Public/Agency Testimony

<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>

CPU Policy Response Table 3: Public/Agency Testimony

<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. AA overpassMultimodal 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>

CPU Policy Response Table 3: Public/Agency Testimony

<p>[change approved by PC, 1/7/2026.]</p>	<p>airport. <u>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 Mattheiss 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 low-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>	

CPU Policy Response Table 3: Public/Agency Testimony

<p>specific recommendations for test edits to the CP, which included:</p> <p>31.02.340 “Environment and open space policies”</p> <ul style="list-style-type: none"> • (1)(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 <u>regularly (at least every two years)</u> 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 <u>on a regular basis</u> to ensure their understanding of the principles behind regulatory protection and to increase support for protection outside of the regulatory framework. <p>31.02.340 “Environment and open space policies” (6) Marine Resources.</p>	<p>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.</p> <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>
---	--

CPU Policy Response Table 3: Public/Agency Testimony

<ul style="list-style-type: none"> • (a) Policy 16. Clallam County should <u>shall</u> work to avoid achieve alternatives for <u>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>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>
<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>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>

CPU Policy Response Table 3: Public/Agency Testimony

<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 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; <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>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> <p>Per 1/21/26 discussion, the following is suggested as the 2nd sentence: <u>“The County shall work-use habitat restoration and land use practices which cause no further degradation to habitat needs as means for toward preventing 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.”</u></p> <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>
---	--

CPU Policy Response Table 3: Public/Agency Testimony

<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) Floodplains <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. <u>Per 1/21/26 discussion, suggest the following edits:</u> "Protection of coastal bluffs and bluff vegetation by preventing unmanaged drainage <u>resulting from development or human alterations to the landscape.</u>"</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>
--	---

CPU Policy Response Table 3: Public/Agency Testimony

<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</u> 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 <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>Per 1/21/26 discussion, suggest the following to first sentence: "... low intensity land use activities including agricultural and recreational land uses in <u>riverine floodplain areas and marine shorelines</u> should be encouraged <u>and other land uses in these areas discouraged</u>."</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>
---	--

CPU Policy Response Table 3: Public/Agency Testimony

<p>measures, but, when structural methods are necessary, they shall not obstruct fish passage. Structural flood control measures should <u>shall</u> preserve or enhance existing flow characteristics for fisheries, irrigation, and other river uses. Flood control activities should <u>develop</u> or <u>improve</u> diversity of habitat for fish and wildlife, and at minimum not <u>result</u> in no net loss to fish and wildlife resources, but wherever possible develop or improve <u>diversity of habitat for those resources.</u> <u>To</u> protect marine shoreline habitat from flood damage and <u>recognize up- and down-current effects from flood management activities.</u> Clallam County should <u>require</u> best management practices for <u>maintaining</u> 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 <u>minimum result in no net loss.</u></p>	<p>Recommend not adopting this change. Use of "shall" is legally ambiguous. "Should" provides sufficient guidance.</p> <p>Recommend adopting this change as it better reflects current state mandates concerning "no-net loss."</p> <p>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.</p>
--	--

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, and <u>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>Recommend adopting policy change. In this context, policy is appropriate.</p>
<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 and coastal ecosystems,</u> 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>Per 1/21/26 discussion, reject proposed change. Restoring coastal ecosystems is complete and includes “flora and fauna.”</p>

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. 	<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>
<ul style="list-style-type: none"> • <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"> • (1)(h) The master planned resort is consistent with development regulations of 	<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 no net loss</u> 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"> • “Callam County shall work to achieve <u>long-term net gain no net loss</u> of regulated wetlands’ functions and values through restoration and enhancement at the watershed scale, while allowing a reasonable use of property <u>with no net loss, at minimum, with regard to their functions and values</u>, in the short-term and should work to achieve a long-term net gain in these attributes through restoration and enhancement.” 	<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>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 with a focus on <u>achieving net ecological gains of ecosystem attributes, while to 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 conservation areas, expanded buffers, 	<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

<p>greenbelts, wildlife and open space bridges and corridors. Incorporate climate considerations in determining permissible activities within wetlands and wildlife habitats.</p> <p>31.02.340 “Environment and Open Space Policies” (15) Oil and other Hazardous Materials. Processing and Transmission.</p> <ul style="list-style-type: none"> • Policy 40. The coastline, coastal waters, and upland areas should be protected from the recognized problems and depreciation which could be brought about by <u>oil or crude transport</u> 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, <u>and facilities processing any hazardous material known or proven to be hazardous.</u> <p>31.02.420 “Transportation – Goals and Policies”</p>	<p>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.</p>
---	---

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 <u>should 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 <u>Protect wildlife habitat and prevent marine water quality degradation, where possible, through:</u> <ul style="list-style-type: none"> (1) <u>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.</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>
--	--

CPU Policy Response Table 3: Public/Agency Testimony

<p>(iv) Design road geometrics and drainage to intercept or minimize the transport of roadway sanding materials from entering marine shorelines.</p> <p>(v) Tug boat escorts are needed in more areas; home-porting is recommended for Port Angeles Harbor.</p> <p>(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.</p> <p>(vii) Advocate at the state level for maintaining or increasing agency spill responders in Clallam County.</p>	<p>Per 1/21/26 discussion, suggest the following language for (v): "<u>The need for tug-boat escorts should be considered</u>are needed in more areas; and if determined necessary, home-porting is recommended for Port Angeles Harbor <u>would be recommended</u>."</p>
<p>23) 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 author's 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>
<p>25) Letter from Hoh Indian Tribe, dated 01/05/2026.</p> <ul style="list-style-type: none"> 31.02.170 Designation of Mineral Resource Land. As the plan states, "environmental impacts of mineral 	<p>The concerns expressed are legitimate and policy that ensures adequate notice under SEPA review is appropriate. Suggest amending 31.02.170(1)(e): "The review of an application for a MRL or MRL0D</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>extraction can be substantial". That level of ground disturbance can also have negative impacts on Tribal cultural assets and areas. If the County undertakes any actions that could potentially affect Tribal cultural resources, including analyzing whether resources are present in a SEPA process, the Hoh Tribal Chairperson and Tribal Historic Preservation Officer should be notified. We'd like to see Tribal consultation required and mentioned in the Comprehensive Plan so that our jurisdictions can work together and ensure valuable resources are not harmed.</p> <ul style="list-style-type: none"> <p>31.02.282 Affordable housing issues, & 31.02.283 Affordable housing policies. Developing more affordable housing in Forks and the surrounding area is a priority for Hoh Tribal members. The supply of affordable housing in the County does not currently meet demand. This affects both Tribal citizens and the Tribe's ability to attract and retain staff members. We appreciate the variety of housing policies and hope they will lead to a larger housing supply of varied types and affordability levels in Forks, the Three Rivers area, and Beaver.</p> <p>31.02.340 Environment and open space policies. The Hoh Tribe is deeply invested in environmental protection and conservation. We run a robust Natural Resources Department dedicated to</p> 	<p>designation will include a site-specific SEPA checklist and threshold determination. Tribes with Usual and Accustomed Areas within or adjacent to the site shall be provided notice of the application and consulted to ensure Tribal cultural assets are not impacted, as part of the SEPA review process..."</p> <p>No policy recommendation. Several of the policies intended to support affordable housing should have a positive impact to address the concerns expressed.</p>
--	--

CPU Policy Response Table 3: Public/Agency Testimony

<p>monitoring, restoration, and careful stewardship. We support many of the environmental policies within the Comprehensive Plan, but there are several areas in which these regulations could be strengthened to better protect our joint area's character and abundance:</p> <ul style="list-style-type: none"> ➤ Wetlands in WA have been overwhelmingly developed, which is deeply troubling, given their ecological importance. Right now, Policy 9 in 31.02.340 (3) calls for no net loss of wetlands. 2 While no net loss has previously been standard practice, we are seeing wetlands continue to disappear. This policy is not protecting our ecosystems. 3 It's time for bolder action. We encourage exploration and development of the "net ecological gain" or "NEG" concept in place of "no net loss". ➤ The general goals of the Habitat section in the Plan align with our own, including protecting habitat, restoring degraded fish habitat, etc. However, we'd like to see more specifics that will make environmental protections more concrete. Many of the policies contain the word "should" and are framed as goals rather than as strict requirements for development that could protect the environment. ➤ The Environment section does not discuss required riparian buffers. While the Forest 	<p>Per testimony received from the MRC, changes have already been proposed in this regard (see Testimony #22, p. 30).</p> <p>The use of "should" within the Comprehensive Plan and at the policy level is appropriate. The regulation (Critical Areas Code, Shoreline Master Program) is where more definitive and "concrete" language is appropriate.</p> <p>Riparian buffers and buffers for wetlands and landside hazard areas are established within the regulation (Critical Areas Ordinance, Shoreline</p>
--	--

CPU Policy Response Table 3: Public/Agency Testimony

<p>Land Use section does discuss implementing best management practices as defined by the Forest Practices Act, we also advocate for establishing riparian buffers for all other types of land use as well. The County should consider policy language that adopts stream and river buffers the width of one 200-year site-potential tree height (SPTH) measured from the edge of the active channel or active floodplain, consistent with Washington Department of Fish and Wildlife Riparian Ecosystems guidance.⁴ Current buffers averaging 50-150 feet significantly under-protect riparian functions compared to optimal 200+ foot widths for large coniferous systems essential to salmon habitat. Whether addressed in the Comprehensive Plan policies or the Critical Areas Ordinance implementation regulations, these enhanced buffer standards are essential.</p> <ul style="list-style-type: none"> 31.02.350 Historic and cultural resources policies. Consultation and notification prior to any action that may affect Tribal lands and/or resources is always the best policy. For this reason, we support 31.02.350 Policy 3. However, this should be expanded beyond development applications to consultation before changing zoning regulations and before any activity that will involve ground disturbance. 	<p>Master Program). The comments are correct regarding use of the site-potential tree height (SPTH) as a standard under best available science for riparian buffers. The CPU's BAS Report and GAP Analysis both reflect this need. These documents form the basis of changes that will be made to the Critical Areas Ordinance within 12 months of adoption of the CPU, and again in the Shoreline Master Program during its update.</p> <p>Recommend amending 31.02.350(2): "Clallam County shall recognize tribal nations in adoption of the Comprehensive Plan and development regulations. Affected tribal nations shall be notified of development applications or changes in development regulations 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, RCW 27.53, RCW 68.60, WAC 25-48, WAC 25-46, RCW 42.56.300, RCW 27.44, RCW 68.50, etc."</p>
---	--

CPU Policy Response Table 3: Public/Agency Testimony

<ul style="list-style-type: none"> 31.02.420 Transportation – Goals and Policies. Many Tribal members depend on public transportation around the Olympic Peninsula, including routes and connectors through Jefferson and Clallam County. In surveys we conducted about the Comprehensive Plan process, increased transportation around the Olympic Peninsula was a high priority. As Forks grows, we recommend including increased funding and support for the public bus routes that travel to Forks. 31.02.720 Utility policies. Clallam PUD is the service provider for the Hoh Indian Reservation. Due to its remote location, power outages are frequent on the Olympic Peninsula is likely to increase as more people move to the area, more people drive electric vehicles, and summer temperatures continue to rise. Electricity is central to keeping Tribal members healthy. The Comprehensive Plan can address these future issues by prioritizing upgrades to existing infrastructure and development of additional lines. Emergency Management. The Hoh Indian Tribe would like to continue to work with both Clallam and Jefferson Counties to strengthen our emergency response abilities. Due to the remote nature of the Hoh Indian Reservation and the complexity of insurance jurisdictions, 	<p>Propose new section 31.02.420(3)(e): <u>“As the City of Forks and vicinity develops, support and encourage the commensurate expansion of transit service between Forks and the rest of the Olympic Peninsula.”</u></p> <p>New policy 31.02.720(6) could be expanded: <u>“(6) 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. The PUD should be encouraged to equitably prioritize upgrades to existing infrastructure and development of service line redundancy in communities at higher risk of climate impacts, such as the west end of the County and beyond within the district’s service boundary.”</u></p> <p>The Hoh Indian Tribe has been included in the Climate Vulnerability Assessment (Exhibit K), setting the foundation for future collaboration and emergency response improvements.</p>
--	--

CPU Policy Response Table 3: Public/Agency Testimony

<p>among other things, it is difficult to get adequate and timely emergency services on the Hoh Indian Reservation. The Tribe has had to watch buildings burn down because there is no structural fire response on the Reservation. While the Reservation lies in Jefferson County, the proximity of Forks means that Clallam County assets are often physically closer. Whether through the Comprehensive Plan, the Hazard Mitigation Plan, or other efforts, we would like to continue to work with both Counties and the City of Forks to find multi-jurisdictional solutions that keep everyone safe.</p>	
<p>26) Email testimony received from Ginger Wierzbowski, dated 01/20/2026.</p> <ul style="list-style-type: none"> Advocates for allowing "Harvest-Host style (RV parking) overnight stays" as a low-impact agritourism activity for farms. The comments include a range of economic benefits and help to preserve farms. 	<p>No policy recommendation. With the changes adopted for Agricultural Accessory Uses (Ch. 33.48) in June 2024, bed-n-breakfast inns, vacation rentals, and work stays are an option for hosting accommodations on farms. With the recent pause in the adoption of RV use standards, it appears premature to consider additional standards that might allow one or more RV accommodations. If favored by the Planning Commission, consideration should be given to reasonable limits on the number of units allowed and facility improvements that might be required.</p>
<p>27) Email testimony received from Judy Larson, dated 01/21/2026. Comments included seven (7) key points:</p> <ul style="list-style-type: none"> 1) indicated that the online material (strike & underscore) was difficult to read, especially tables with new data. 	<p>Could be screen resolution or scaling.</p>

CPU Policy Response Table 3: Public/Agency Testimony

<ul style="list-style-type: none"> • 2) Suggested County demographics support that fewer people have online access. Suggested that 31.01.200(11) "Citizen participation and coordination" supports providing hard copies at libraries. • 3) Concern that comments offered during the Sequim public outreach meeting (7/23/25) would be included in the CPU record. • 4) The CPU does not adequately address 31.01.200 item 10..."and the availability of water." • 5) 31.02[.340] Environment and Open Space (7) Habitat, does not show concerns many have expressed at CCD meetings about the need to "protect, connect & enhance habitat corridors...maintain as important community infrastructure (like Sequim Prairie first irrigation ditch!!) to promote wildlife diversity across connected landscapes. • 6) 31.02.330 Has also been ignored by County's Heritage Committee for protecting this SP ditch from piping. • 7) 31.03.455 This has several areas still needing review/updating. 	<p>Demographic profile does suggest population is aging, but the rate of online use by all age groups continues to increase. 31.01.200(11) requires DCD to encourage the involvement of citizens in the planning process. The County's CPU Public Outreach Plan, as approved by Dept. of Commerce, was followed.</p> <p>Comment #20 of Table 1, <i>Public Comments and Corresponding Recommendations</i>, includes the comments received and staff's recommendation in response.</p> <p>New policy under 31.02.340(4)(d) and 31.02.820(12) directly address this concern, in addition to other modified and existing policies.</p> <p>No policy recommendation. Amendment to 31.02.340(7)(a), directly addresses the concerns raised.</p> <p>Staff does not concur with this assertion. To our knowledge, irrigation ditches are not features protected under historic preservation statutes. No specifics were provided. The section has been reviewed and amended. No further information was provided.</p>
--	---

CPU Policy Response Table 4: Commerce Checklist

Clallam County Comprehensive Plan Update Commerce Checklist, Items still requiring policy revisions (Draft 1/28/2026)

The following items are included in the Commerce Checklist prepared 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 items that still require changes.

Requirement	Policy for Amendment/New Policy
<p>1) Land Use Element, p. 8, j), 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) Land Use Element, p. 10, p), inclusion of "Best Available Science" for the protection of critical areas.</p>	<p>Recommend amendment to 31.02.340(1)(a): "Best conventional <u>technology-available science</u> shall be used to prevent or treat the environmental impacts of conventional pollutants."</p> <p>Recommend amendment to second sentence 31.02.340(1)(c): "The ordinances shall be amended as necessary to implement watershed or</p>

CPU Policy Response Table 4: Commerce Checklist

	<p>special area studies, <u>maintain consistency with best available science (BAS)</u>, and to maintain consistency with the Comprehensive Plan.”</p>
<p>3) Land Use Element, p. 11, s). Per RCW 36.70A.142, allow for the siting of organic materials management facilities (composting) within industrial zones.</p>	<p>Recommend amending 33.17.010(1) and .020(1) to allow <i>organic materials management facilities</i>, 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) Land Use Element, p. 12, 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>	<p>Recommend new section 31.02.820(8)(f): <u>“Policy 8.6: The 2025 Clallam County Hazard Mitigation Plan (HMP), is hereby adopted by this reference (Exhibit M). This policy is also considered part of the Land Use Element of this Comprehensive Plan.</u></p> <p>Recommend new section 31.02.820(13)(c): <u>“Policy 13.3: Chapter 6 of the 2021 Washington State Wildland-Urban Interface Code, is hereby adopted by this reference. This policy is also considered part of the Land Use Element of the Comprehensive Plan.</u></p>
<p>5) Housing Element, p. 13, a). 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, <i>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.”</i></u></p>

CPU Policy Response Table 4: Commerce Checklist

<p>6) Housing Element, p. 16, 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>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 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>
---	---

CPU Policy Response Table 4: Commerce Checklist

<p>7) Capital Facilities Plan Element, p. 17, e). 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>8) Capital Facilities Plan Element, p. 18, g). A policy establishing the requirement to 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>Recommend amending 31.02.320(65): <u>“Policy 65. Prepare a six (6) year financial plan for any public facilities which need to be developed as a result of LOS requirements and projected changes in population. 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. 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 (Appendix I) for detailed financing plan.”</u></p>
<p>9) Utilities Element, p. 18, b). Identify City of Port Angeles as electric purveyor withing City limits.</p>	<p>Recommend amending first sentence at top of p. 21, CFP: <u>“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, which is administered by City of Port Angeles Light Operations.”</u></p>
<p>10) Transportation Element, p. 19, 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. RCW 36.70A.130</p>	<p>Working with consultants to provide a recommendation.</p>
<p>11) Transportation Element, p. 21, e). Forecast multimodal transportation for a minimum of 10 years, including land use</p>	<p>Working with consultants to provide a recommendation.</p>

CPU Policy Response Table 4: Commerce Checklist

<p>assumptions used in estimating travel (RCW 36.70A.070(6)(a)(iii)(E)).</p>	
<p>12) Transportation Element, p. 21, f). A projection of state and local system needs to equitably meet current and future demand and equitably implement the multimodal network. (RCW 36.70A.070(6)(a)(iii)(F)).</p>	<p><u>Recommend new paragraph 3, 31.02.425: "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>13) Transportation Element, p. 22, g). A transition plan for transportation as required in Title II of ADA. 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. RCW 36.70A.070(6)(a)(iii)(G) new in 2023</p>	<p><u>Recommend new section 31.02.420(1)(e)(vii): "In accordance with RCW 36.70A.070(6)(a)(iii)(G), the County has performed an inventory and self-evaluation of current facilities relative to accessibility requirements of the Americans with Disabilities Act of 1990 (ADA). Based on that information, the County is in the process of developing a Transition Plan to address 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." An initial draft of the plan was approved by the WSDOT in May 2025. It is expected the final plan will be adopted in April 2026.</u></p>

CPU Policy Response Table 4: Commerce Checklist

<p>14) Transportation Element, p. 22, 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>15) Transportation Element, p. 22, j). An analysis of future funding capability to judge needs against probable funding resources. RCW 36.70A.070(6)(a)(iv)(A), WAC 365.196-430(2)(k)(iv)</p>	<p>Working with Consultants to provide a recommendation.</p>
<p>15) Transportation Element, p. 23, 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. <u>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).</u>"</p>

CPU Policy Response Table 4: Commerce Checklist

<p>16) Essential Public Facilities, p. 27, a). 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 <u>47.06.140</u>, 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>17) Economic Development, p. 31. Need to update population data under Economic Development Issues. [NOTE: all time-sensitive data under 21.02.610 has been updated with current information and past ten-year trends.]</p>	<p>Recommend amending 31.02.610(1): “Population. As of <u>202505</u>, the Forecasting Division of the Washington State Office of Financial Management (OFM) estimated Clallam County’s population (including incorporated areas) at <u>78,65066,800</u>, which is approximately a <u>1,8four</u> percent increase (<u>0.45one</u> percent annualized rate) from the Census population of <u>77,15564,179</u> in <u>20200</u> and approximately <u>2218</u> percent increase (<u>1.20.9</u> percent annualized rate) from the Census population of <u>64,17956,464</u> in <u>20001990</u>. According to the OFM, the majority of population increase has been due to in-migration. <u>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.</u>”</p>
<p>18) GMA Consistency, General, p. 33, 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>

CPU Policy Response Table 4: Commerce Checklist

	<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>19) GMA Consistency, General, p. 33, 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>20) GMA Consistency, General, p. 33, 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. An analysis of land use designations along the eastern and southern boundaries of Clallam County neighboring Jefferson County revealed rural and commercial forest resource designations that are consistent between jurisdictions. No conflicts have occurred or are anticipated to occur as a result of this CPU.</p>
<p>21) Zoning Code, p. 37, c). Per RCW 36.70A.450, the County is barred from prohibiting family daycare facilities (12 kids or less) from operating from an individual's home within residential or commercial zones. The use is allowed outright, but is conditional in</p>	<p>Recommend amending Sections 33.15.035, .060, .067, .070, and .080, to list <i>Family Daycare Provider</i> as permitted outright.</p>

CPU Policy Response Table 4: Commerce Checklist

<p>the DPA zone, and prohibited in the RLC, TR, UNC and URC Zones.</p>	
<p>22) Zoning Code, p. 39, f). Per RCW 36.70A.410, the County is barred from treating a residential structure occupied by individuals with handicaps any differently than a similar structure occupied by a family or other unrelated individuals.</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>
<p>23) Zoning Code, p. 39, 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>Recommend new section 31.02.283(3)(m): <u>"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>24) Resource Lands, p. 44, b). Pursuant to RCW 36.70A.060(1)(a), 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>Recommend new section 33.40.110: <u>"Notice of Proximity to Resource Zone.</u> <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> <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</u></p>

CPU Policy Response Table 4: Commerce Checklist

	<p>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.”</p>
<p>25) Concurrency and Transportation Demand Management, p. 51, a). Language to prohibit development when LOS cannot be met, as required under RCW 36.70A.070(6)(b).</p>	<p>Recommend amending 31.02.420(7): “<i>Mitigation.</i> (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 <u>develop strategies to require new development to rectify and/or compensate for impacts to transportation facilities not meeting minimum safety standards, or prohibit development when currently adopted levels of service (LOS) are diminished below acceptable levels when reasonable and capable of being accomplished.</u> 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.”</p>
<p>26) Concurrency and Transportation Demand Management, p. 52, d). requirements are</p>	<p>Working with Consultants to provide a recommendation.</p>

CPU Policy Response Table 4: Commerce Checklist

<p>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>27) Plan and Regulation Amendments, p. 55, d). Regulations define <i>emergency</i> 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 as set forth under RCW 36.70A.130(2)(b), in order to allow communities to consider the cumulative impacts of the proposed revisions..."</p>
<p>28) Plan and Regulation Amendments, p. 56, g). 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 160 days following adoption and publication of notice of adoption by the Clallam County Board of Commissioners."</p>

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	Section II: Development Regulations	Appendix
LAND USE	CRITICAL AREAS	ELEMENT UPDATES UNDER HB 1181 (Climate)
HOUSING	ZONING CODE	
CAPITAL FACILITIES	SHORELINE MASTER PROGRAM	
UTILITIES	RESOURCE LANDS	
TRANSPORTATION	ESSENTIAL PUBLIC FACILITIES	
RURAL	SUBDIVISION CODE	
SHORELINE	STORMWATER	
ESSENTIAL PUBLIC FACILITIES	ORGANIC MATERIALS MANAGEMENT	
TRIBAL PARTICIPATION	IMPACT FEES	
CLIMATE CHANGE & RESILIENCY	CONCURRENCY & TDM	
ECONOMIC DEVELOPMENT	TRIBAL PARTICIPATION	
PARKS & RECREATION	OPTIONAL REGULATIONS	
OPTIONAL ELEMENTS	PROJECT REVIEW PROCEDURES	
CONSISTENCY	PLAN & REGULATION AMENDMENTS	
PUBLIC PARTICIPATION		

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	
--	--	---	-------	--

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>Notice: New 2021-2022 legislation ESSB 5593: changes to RCW 36.70A.130 regarding UGA size, patterns of development, suitability and infrastructure.</p> <p>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.</p> <p>See amended policy under CCC 31.02.100(1). This issue is also addressed under CCC 31.02.810(4),</p>	<p>Completed: 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: Date:</p>

Section I: Comprehensive Plan Elements

<p>RCW 36.70A.070(1) amended in 2023 and RCW 36.70A.110(6) WAC 365-196-400(2) (d), WAC 365-196-405(2) (1) (1)</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. Links to Comprehensive Plan Land Use Maps are provided under CCC 31.02.910(2).</p>	12/10/2025
<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. RCW 36.70A.110(2&6), RCW 36.70A.130, WAC 365-196-310</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: Date: 6/20/2025</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</p>	<p>In Current Plan? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p> <p>Maybe</p> <p>Notes</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</p>	<p>Completed: Date: 12/8/2025</p>

Section I: Comprehensive Plan Elements

<p>river has a mean annual flow of 1,000 or more cubic feet per second, it meets the statutory exceptions to the general ban on such UGA expansions. RCW 36.70A.110(8)</p>			<p>considered as part of this CPU.</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. RCW 36.70A.070(1) (amended in 2023) and WAC 365-196-405(2) (1). Additional resources: Commerce, State Climate guidance, Transportation Efficient Communities' guidance, and the WA Department of Health Washington State Plan for Healthy Communities and Active Community Environment Toolkit</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 RCW 36.70A.070(9)(c). However, this issue is addressed under CCC 31.02.810(6), 31.02.820(2)(c), (7)(d), and (10)(a) through (c).</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. RCW 36.70A.115, RCW 43.62.035 and WAC 365-196-405(2)(F)</p>	<p>No</p>	<p>Yes</p>	<p>The LCA (Appendix B) provides this information, and its data was consistently used throughout the 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. RCW 36.70A.070(1),</p>	<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><u>WAC 365-196-405(2) (1)</u></p> <ul style="list-style-type: none"> For counties required to plan under the Buildable Lands Program, <u>RCW 36.70A.215</u> amended in 2017, some jurisdictions may need to identify reasonable measures to reconcile inconsistencies. See <u>Commerce's Buildable Lands Program page</u>. 				
<p>h. Provisions for protection of the quality and quantity of groundwater used for public water supplies. <u>RCW 36.70A.070(1)</u>; <u>WAC 365-196-405(1) (c)</u>; <u>WAC 365-196-485(1) (d)</u></p>	<p>In Current Plan? Yes/No</p> <p>If Yes, cite section</p> <p>Yes CCC 31.02.320</p>	<p>Changes needed to meet current statute? Yes/No</p> <p>Yes</p>	<p>Notes</p> <p>While there is no "Land Use" chapter, this provision is found under the environment and open space goals chapter. Assuming with this update, a Land Use chapter will need to be created and this included. The County-Wide CP has been organized by Articles. Article II is the Land Use Article, and includes general; agriculture, commercial forest and mineral resource lands, urban growth areas, master planned resorts, and commercial & industrial land use. This issue is specifically addressed under amended section 31.02.340(4).</p>	<p>Completed: 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. <u>RCW 36.70A.150</u> and <u>WAC 365-196-340</u></p>	<p>No</p>	<p>Yes</p>	<p>While there is no "Land Use" chapter, there are some provisions found under the "Goals of the Capital Facilities Plan" chapter. Assuming with this update, a Land Use chapter will need to be created and this included. The County-Wide CP has been organized by Articles. Article II is the Land Use Article, and includes general; agriculture, commercial forest and mineral resource lands, urban growth areas, master planned resorts, and commercial & industrial land use. The issues of this section are addressed under CCC 31.02.100, 31.02.310 and Appendix I.</p>	<p>Completed: Date: 11/12/2025</p>

Section I: Comprehensive Plan Elements

<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 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>Yes CCC 31.02.340(14)</p>	<p>Yes</p>	<p>While there is no "Land Use" chapter, this provision is found under the environment and open space goals chapter. Assuming with this update, a Land Use chapter will need to be created and this included. The County-Wide CP has been organized by Articles. Article II is the Land Use Article, and includes general; agriculture, commercial forest and mineral resource lands, urban growth areas, master planned resorts, and commercial & industrial land use Specifically addressed under 31.02.340(14)(c).</p>	<p>Completed: <input type="checkbox"/> Date:</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>Yes</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>	

Section I: Comprehensive Plan Elements

<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>
<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> 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>While there is no "Land Use" chapter, this provision is found under the Transportation chapter. Assuming with this update, a Land Use chapter will need to be created and this included. The County-Wide CP has been organized by Articles. Article II is the Land Use Article, and includes general, agriculture, commercial forest and mineral resource lands, urban growth areas, master planned resorts, and commercial & industrial land use</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 <u>2023</u>) and <u>WAC 365-196-405(2)(e)</u> Note: <u>RCW 90.56.010(27)</u> defines waters of the state. 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</u></p>	<p>Yes 31.02.340(1)(b), (2)(a) & (b), (8), and (12).</p>	<p>Yes</p>	<p>Will need to revisit this in light of climate guidance. Specific drainage issues should be identified more specifically in the plan. See new policy 31.02.340(4)(d), amended policy 31.02.340(8), and new policy 31.02.820(12).</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/12/2025</p>

Section I: Comprehensive Plan Elements

<u>Action Agenda</u>				

<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.</p> <p>RCW 36.70A.030(6), RCW 36.70A.172, WAC 365-190-080</p> <p>Best Available Science: see WAC 365-195-900 through -925</p> <p>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>In Current Plan? Yes/No</p> <p>If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>	<p>Completed: <input type="checkbox"/></p> <p>Date:</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>Yes</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"/></p> <p>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.</p> <p>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"/></p> <p>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 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)</p> <p>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: <input checked="" type="checkbox"/> 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/ <input checked="" type="checkbox"/> 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.</p> <p>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) & (f), (9)(c), and (13)(c).	Completed: <input checked="" type="checkbox"/> 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>

<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>	<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>Completed: ☑ 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)(d) 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>	<p>No</p>	<p>Yes</p>	<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: ☑ 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 	<p>No</p>	<p>Yes</p>	<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: ☑ 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>Completed: <input checked="" type="checkbox"/> Date: 12/8/2025</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>In Current Plan? Yes/No If yes, cite section</p> <p>No</p>	<p>Changes needed to meet current statute? Yes/No</p> <p>Yes</p>	<p>Notes</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>No</p>	<p>Yes</p>	<p>Inventory included in updated CFP (Appendix I)</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/06/2025</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>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).</p>	<p>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>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).</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/06/2025</p>

Infrastructure investments should consider equity and plan for any potential displacement impacts.				
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>	Yes CCC 31.02.320(6)	Yes	The six-year funding mechanisms for financing capital facilities is included in the updated Capital Facilities Plan (Appendix I).	Completed: Date: 11/06/2025
g. A policy or procedure to reassess the land use element 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	No	Yes	See amended policy 31.02.320(6)	Completed: Date: 11/20/2025
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>	No	No	The Clallam County Comprehensive plan does not identify development impact fees as a source of public facility and service funding.	Completed: Date: <input type="checkbox"/>
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	No	Yes	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).	Completed: Date: 11/06/2025
Utilities Element Consistent with relevant CWPPs and <u>RCW 36.70A.070(4)</u> 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 <u>HB 1181</u> (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.				
a. The general location, proposed location and capacity of all existing and proposed utilities, to	Yes CCC 31.02.710	Yes	Currently, the comprehensive plan just covers electric and telecommunications. The update should include information on sewer, water, and	Completed: Date: 11/06/2025

include telecommunications. <u>RCW 36.70A.070(4)(a)</u> amended in 2023 and <u>WAC 365-196-420</u>			solid waste as well even if managed by other entities. See Capital Facilities Plan (Appendix I).	
b. Identify and include information and contact information about all public entities, including special purpose districts that own utility systems. <u>RCW 36.70A.070 (4)(b)</u> new in 2023	Yes CCC 31.02.710	Yes(?)	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).	Completed: <input checked="" type="checkbox"/> Date: 11/6/2025

Transportation Element

Consistent with relevant CWPPs and RCW 36.70A.070(6) amended in 2023 by HB 1181. See also the new climate element below for jurisdictional requirements.

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>)	No	Yes	31.02.420(6) discusses financing, but it lacks the identification of transportation facilities, and public facilities and services needed to serve the UGA.	Completed: <input type="checkbox"/> Date:
	In Current Plan? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Notes	
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> .	Yes 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	Yes	Will need to update information in table. See amended 31.02.415.	Completed: <input checked="" type="checkbox"/> Date: 11/20/2025

	<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) and (C), 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), RCW 36.70A.070(6)(a)(iii)(E), amended in 2023, 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)(F), amended in 2023, 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>

<p>g. A transition plan for transportation as required in Title II of ADA. 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. RCW 36.70A.070(6)(a)(iii)(G) new in 2023.</p>	<p>In Current Plan? Yes/No If yes, cite section</p> <p>No</p>	<p>Changes needed to meet current statute? Yes/No</p> <p>Yes</p>	<p>Notes</p> <p>A transition plan for Transportation will be required. See new section 31.02.420(1)(e)(vii).</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/20/2025</p>
<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. RCW 36.70A.070(6)(a)(vii) amended in 2023, WAC 365-196-430(2)(i)</p>	<p>Yes CCC 31.02.440-442</p>	<p>Yes</p>	<p>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.</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>i. A description of any existing and planned transportation demand management (TDM) strategies, such as HOV lanes or subsidy programs, parking policies, etc. RCW 36.70A.070(6)(a)(vi) and WAC 365-196-430(2)(i)(i)</p>	<p>Yes CCC 31.02.420(1)(i)(vi)</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>j. An analysis of future funding capability to judge needs against probable funding resources. RCW 36.70A.070(6)(a)(iv)(A), WAC 365.196-430(2)(k)(iv)</p>	<p>No</p>	<p>Yes</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<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. RCW 36.70A.070(6)(a)(iv)(B) and RCW 35.77.010, WAC 365-196-430(2)(k)(ii)</p>	<p>No</p>	<p>Yes</p>	<p>This analysis is accomplished in the Six Year Transportation Improvement Program process (6-year TIP).</p>	<p>Completed: <input type="checkbox"/> Date:</p>

	<p>In Current Plan? Yes/No</p> <p>If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>	
<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)(iv)(C) amended in 2023, 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), WAC 365-196-430(1)(e) and 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>

<p>b. Policies that limit urban services in rural areas. RCW 36.70A.110(4) amended in 2021</p> <p>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>In Current Plan? Yes/No</p> <p>If yes, cite section</p> <p>Yes CCC 31.02.263(4)(c) and (d)</p>	<p>Changes needed to meet current statute? Yes/No</p> <p>No</p>	<p>Notes</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"/></p> <p>Date:</p>
<p>Shoreline</p> <p>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 <u>RCW 36.70A.480</u>. The goals and policies of a shoreline master program for a county or city approved under <u>RCW 90.58</u> shall be considered an element of the county or city's comprehensive plan.</p>				
<p>a. The policies, goals, and provisions of <u>RCW 90.58</u> 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 <u>RCW 36.70A.070, 36.70A.040(4), 35.63.125, 35A.63.105, 36.70A.480</u></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"/></p> <p>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 <u>RCW 90.58.060</u>. See <u>Ecology's Shoreline planners' toolbox</u> 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"/></p> <p>Date:</p>

<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 RCW 36.70A.030(5) and have been designated as such by a local government pursuant to RCW 36.70A.060(2)</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>Completed: <input type="checkbox"/> Date:</p>
<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 RCW 90.58.030(2)(f), then the local jurisdiction shall continue to regulate those critical areas and their required buffers pursuant to RCW 36.70A.060(2).</p>	<p>Yes CCC 35.30.030 Table 6-1</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>

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): RCW 36.70A.200 and WAC 365-196-550(1) Notes: RCW 36.70A.200 amended 2021 regarding reentry and rehabilitation facilities. EPFs are defined in RCW 36.70A.200. Regional transit authority facilities are included in the list of essential public facilities.</p>	<p>Yes CCC 31.02.810</p>	<p>Yes</p>	<p>The section is currently called Capital Facilities Plan. Should be renamed "Essential Public Facilities". Needs updating to include RCW 36.70A.200 amended 2021 regarding reentry and rehabilitation facilities. The process for identifying locations and procedures for siting EPFs 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.</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>b. Policies or procedures that ensure the comprehensive plan does not preclude the siting of EPFs. RCW 36.70A.200(5) Note: If the EPF siting process is in the CWPPs,</p>	<p>Yes Subsection 9 of "Siting of Public Capital Facilities" under the CWPP</p>	<p>Yes</p>	<p>The County shall consider adding a policy confirming that nothing in the comp plan should preclude the siting of EPFs. See amended policy 31.02.300(8).</p>	<p>Completed: <input type="checkbox"/> Date:</p>

this policy may be contained in the comprehensive plan as well. WAC 365-196-550(3)	addresses this issue concerning EPFS.		Notes	
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.				
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	No	Yes	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 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).	Completed: <input type="checkbox"/> Date:
b. <i>Urban Growth Areas</i> : 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)	No	Yes	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 (6/13/2025) details Tribal outreach, invitation to	Completed: <input type="checkbox"/> Date:

			participate, and information sharing, which the County has executed completely.	
--	--	--	---	--

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: <input type="checkbox"/> 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 polices 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</p> <p>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</p> <p>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</p> <p>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: <input checked="" type="checkbox"/> 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: <input checked="" type="checkbox"/> 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)(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. With two</p>	<p>Completed: <input type="checkbox"/> Date:</p>

Public Participation

			<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>	
<p>a. Plan ensures public participation in the comprehensive planning process. RCW 36.70A.020(11), .035, and 140, WAC 365-196-600(3) 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 RCW 36.70A.130(2), WAC365-196-640 The plan sets out a procedure for adopting emergency amendments and defines emergency. RCW 36.70A.130(2)(b) and RCW 36.70A.390, new in 2021, (HB 1220 sections 3-5), WAC 365-196-650(4) 	<p>Yes CCC 31.08.300, .305, and .310</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>

<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>In Current Plan? Yes/No</p> <p>If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>	<p>Completed: <input type="checkbox"/></p> <p>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"/></p> <p>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 (June 13, 2025) included efforts such as specific Tribal outreach, notice of process and comment</p>	<p>Completed: <input type="checkbox"/></p> <p>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>	
---	--	--	---	--

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>	<p>Yes CCC 33.19; 33.20</p>	<p>Yes</p>	<p>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>	<p>Completed: <input checked="" type="checkbox"/> Date: 10/18/2025</p>

housing needs, including emergency housing and permanent supportive housing.				
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	In Current Regs? Yes/No If yes, cite section Yes Definitions - CCC 33.03.010.100	Changes needed to meet current statute? Yes/No yes	"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.	Completed: <input checked="" type="checkbox"/> Date: 11/18/2025
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.	Yes CCC 33.10; 33.13	Yes	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.	Completed: <input checked="" type="checkbox"/> Date: 10/28/2025
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	Yes CCC 33.03.010.100	No	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.	Completed: <input type="checkbox"/> Date:

<p>Construction and Safety Standards Act of 1974</p>				
<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>In Current Regs? Yes/No</p> <p>If yes, cite section</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>Notes</p> <p>Allowed in Sequim and Carlsborg UGAs, but only as conditional uses. Not mentioned in CCC 33.10 or 33.13. See amended Tables 33.19,040(A) and 33.20,040(A), removing reference to “Group Homes.” Default is to amended definition for “Household” to avoid any discriminatory provisions.</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</p> <p>See also RCW 36.70A.545 and WAC 365-196-410(2)(e)(i)</p> <p>“affordable housing” is defined in RCW 84.14.010</p> <p>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 are 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>i. Within UGAs, allow an increased density bonus consistent with local needs for any affordable housing development of any single-family or</p>	<p>In Current Regs? Yes/No</p> <p>No</p>	<p>Changes needed to meet current statute? Yes/No</p> <p>Yes</p>	<p>Notes</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 are 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)</p> <p>Note: This applies to cities, counties, other local government entities and agencies.</p>	No	Yes	<p>Clallam County does not currently have affordable housing regulations. No action required unless and until incentive programs are 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>	Yes CCC 33.10	No	<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>	Yes CCC 33.22	No	<p>LAMIRD CCC Chapter 33.22</p>	<p>Completed: <input type="checkbox"/> Date:</p>

<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 wildfire 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>In Current Regs? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</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>Yes CCC 33.08</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</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		Completed: <input type="checkbox"/> Date:
---	----------------	----------------	--	--

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:
<p>a. Zoning designations are consistent with Shoreline Master Program (SMP) environmental designations. RCW 36.70A.480</p>	Yes See Clallam County Shoreline Environmental Designations (SED) Map	No		Completed: <input type="checkbox"/> Date:
<p>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)</p> <p>See Ecology's shoreline planners' toolbox for the SMP Checklist and other resources and Ecology's</p>	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 Link to Comprehensive Land Use Map is provided under CCC 31.02.910(2).</p>	<p>Completed: <input type="checkbox"/> Date:</p>
--	--	--	--	--

<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>In Current Regs? Yes/No If yes, cite section</p> <p>No</p>	<p>Changes needed to meet current statute? Yes/No</p> <p>Yes</p>	<p>Notes</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>Completed: <input checked="" type="checkbox"/> Date: 12/2/2025</p>
--	---	--	---	---

<p>on which a variety of commercial activities may occur that are regulations to implement comprehensive plan</p>				
<p>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)</p>	<p>No</p>	<p>Yes</p>	<p>See amended section 31.02.115(3)(c)</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/20/2025</p>
<p>d. Counties must conduct a comprehensive countywide analysis when classifying, designating and de-designating natural resource lands. WAC 365-190-040(10)(c)</p>	<p>Yes CCC 31.08.200(12)</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>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>Yes, 31.02.150 through 190, and 33.07.045, and Ch. 33.62.</p>	<p>Yes</p>		<p>Completed: <input type="checkbox"/> Date:</p>

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).

<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>In Current Regs? Yes/No If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</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. See new policies under CCC 31.02.300(8).</p>	<p>Completed: <input type="checkbox"/> Date:</p>

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.					
d. Include in short plat regulations procedures for unit lot subdivisions allowing division of a parent lot into separately owned unit lots. <u>RCW 58.17.060(3)</u> new in 2023 by <u>SB 5258 - section 11</u>	No	Yes	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	Completed: <input type="checkbox"/> Date:
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. <u>RCW 36.70A.070(1)</u> 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 <u>Commercé's 2005 Technical Guidance Document for Clearing and Grading in Western Washington</u> . Adoption of a low impact development ordinance. See <u>Puget Sound Partnership's 2012 Low Impact Development guidance</u> and Ecology's 2013 <u>Eastern Washington Low Impact Development guidance</u> .	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).

<p>New section RCW 36.70A.142, new in 2022 legislation 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 (SWMMP) to meet OM reduction and diversion goals. Siting to meet criteria described in RCW 70A.205.040(3).</p> <p>See also RCW 36.70.330. For applicability, see RCW 70A.205.540.</p>	<p>In Current Regs? Yes/No If yes, cite section</p> <p>Yes, CCC 33.40.070</p>	<p>Changes needed to meet current statute? Yes/No</p> <p>Yes</p>	<p>Notes</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

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>a. If adopted, impact fees are applied consistent with RCW 82.02.050 amended in 2015, RCW 82.02.060 amended in 2023 by SB 5258, 070.080, 090 amended in 2018 and 100.</p> <p>WAC 365-196-850 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 RCW 82.02.050(3) 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>Changes needed to meet current statute? Yes/No</p>	<p>Notes</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>Not applicable. Per CCC 31.02.810, no impact fees exist.</p>	<p>No</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>	<p>Completed: <input type="checkbox"/> Date:</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>Changes needed to meet current statute? Yes/No</p>	<p>Notes</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>Changes needed to meet current statute? Yes/No</p>	<p>Notes</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>	<p>Yes, CCC 31.02.420(1)(a) and (7)</p>	<p>Possibly</p>	<p>Current regulations include other methods of meeting concurrency when levels of service standards 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).</p>	<p>Completed: <input type="checkbox"/> Date: 11/12/2025</p>
<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>	<p>Yes, CCC 31.02.420(1)(a), 31.02.420(1)(d), 31.02.420(1)(f)</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>c. Highways of statewide significance (HSS) are exempt from the concurrency ordinance. RCW 36.70A.070(6)(a)(iii)(C)</p>	<p>Yes</p>	<p>No</p>	<p>Highways not listed under concurrency definition in 31.02.410(1).</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<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>	<p>Yes, CCC 31.02.420(1)(i)(iii), 31.02.420(1)(i)(iv)</p>	<p>Yes</p>	<p>Regulations that list specific TDM strategies as requirements may be needed. Currently TDM strategies are encouraged.</p>	<p>Completed: <input type="checkbox"/> Date:</p>

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.	In Current Regs? Yes/No If yes, cite section	Changes needed to meet current statute? Yes/No	Not applicable.	No	County does not provide financial incentives to employees who ride share, car share, or use public transportation.
					Notes
					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	Yes	Yes	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	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</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.

<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>In Current Regs? Yes/No</p> <p>If yes, cite section</p>	<p>Changes needed to meet current statute? Yes/No</p>	<p>Notes</p>	<p>Completed: <input type="checkbox"/></p> <p>Date:</p>
	<p>Yes</p> <p>CCC 26.10.340(3) and 26.10.350</p>	<p>No</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"/></p> <p>Date:</p>
---	--------------------------------------	-----------	--	---

<p>exceptions). RCW 36.70A.130(2) and WAC 365-196-640(3)</p> <p>b. Regulations define emergency for an emergency plan amendment. RCW 36.70A.130(2)(b) and WAC 365-196-640(4)</p>	<p>No</p>	<p>Yes</p>	<p>Current regulations state that the Board of Commissioners determine an emergency. See amended policy 31.08.300.</p>	<p>Completed: <input type="checkbox"/> Date: 12/8/2025</p>
<p>c. Regulations include a docketing process for requesting and considering plan amendments. RCW 36.70A.130(2), RCW 36.70A.470, and WAC 365-196-640(6)</p>	<p>Yes, CCC 31.08.305, 31.08.310, 31.08.320, 31.08.330, 31.08.340, 31.08.360, 31.08.370,</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>d. A process has been established for early and continuous public notification and participation in the planning process. RCW 36.70A.020(11), RCW 36.70A.035 and RCW 36.70A.140. See WAC 365-196-600 regarding public participation and WAC 365-196-610(2) listing recommendations for meeting requirements.</p>	<p>Yes, CCC 31.08.330, 26.10.400, 26.10.410</p>	<p>No</p>	<p>Notes</p>	<p>Completed: <input type="checkbox"/> Date:</p>
<p>e. A process exists to assure that proposed regulatory or administrative actions do not result in an unconstitutional taking of private property RCW 36.70A.370. See the 2018 Advisory Memo on the Unconstitutional Taking of Private Property</p>	<p>Yes, CCC 31.08.100</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>f. Provisions ensure adequate enforcement of regulations, such as zoning and critical area ordinances (civil or criminal penalties). See implementation strategy in WAC 365-196-650(1).</p>	<p>Yes, CCC 31.08.200</p>	<p>No</p>		<p>Completed: <input type="checkbox"/> Date:</p>
<p>g. Adoption of a policy and regulation establishing the effective date of an action that expands a</p>	<p>No, CCC 31.08.430</p>	<p>Yes</p>	<p>Effective date is set as 10 days after adoption. UGA and LAMIRD expansions</p>	<p>Completed: <input checked="" type="checkbox"/> Date: 11/26/2025</p>

<p>UGA, creates or expands a LAMMRD; 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. RCW 36.70A.067, new in 2022 			<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>	
---	--	--	---	--

● 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		Capital Facilities Element*	Utilities Element*	Parks & Recreation Element*
	Due 2029	Due 2029	Due 2029	Due 2029	Due 2029	Due 2029	Due 2029	Due in 2034	Due in 2034	Due in 2034	Due in 2034	Due in 2034
For jurisdictions with a 2024 deadline and subject to GHG Emissions Reduction [Sec. 15 (10)]												
For jurisdictions with a 2025 & 2026 deadline and subject to GHG Emissions Reduction [Sec. 4 (1) and (2)]	X	X	X	X	X	X*	X*	X*	X*			
Jurisdictions <u>not</u> subject to GHG Emissions Reduction (all years) [Sec. 4 (3) and 9(e)(1)]	Optional	X See RCW 36.70A.070(9)(e)	**	Only counties over 20k pop.	X*	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.

**Clallam County Comprehensive Plan Update
Draft Amendments to the Zoning Code, Title 33, CCC
(Draft 01/23/2026)**

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.

(14) "Building" means any structure utilized or intended for supporting or sheltering any use or occupancy.

(35) "Dwelling uUnit" means any building or any portion thereof which is lawfully establishedintended andor designed to be used, rented, leased, let or hired out to be occupied for living purposes having independent living facilities for one or more personsfamily including permanent provisions for living, sleeping, eating, cooking, sanitation and including accessory structures and improvements.

(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.

(52) “Lodges” means any structure permanent building, constructed and approved in accordance with Chapters 21.01 and 21.02, CCC, accommodating an organization which is operated not-for-profit where entrance to the premises is contingent upon the payment of a monthly or yearly fee.

(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.

(108) “Structure” means anything which is built or constructed, an edifice or building of any kind, or any piece of work artificially erected or composed of parts joined together in some definite manner, but not including unroofed paved areas, fill, automobiles or recreational vehicles, or any fence less than seven feet in height.

(112) “Tiny House” or “Tiny House on Wheels,” for purposes of this Title, are defined by the following two generalized categories as follows:

- a) “Tiny House, Stick-Built” means a Dwelling Unit measuring no larger than 400 square feet in area and constructed in place in accordance with Section AQ102, Appendix Q, International Residential Code, as permitted and administered by the Clallam County Department of Community Development, Building Division.
- b) “Tiny House” or “Tiny House on Wheels” means a modular-type unit, whether constructed on a chassis or not, constructed to State Building Code standards and bearing an insignia verifying approval by the Washington Department of Labor and Industries (L&I) or equivalent. A Tiny House on Wheels may be placed with the chassis and wheels intact and treated for purposes of this regulation as synonymous with a Park Model Recreational Vehicle in accordance with Ch. 21.06, CCC. Permanent placement and occupancy of a Tiny House or Tiny House on Wheels requires placement on a permanent foundation approved by the Clallam County Department of Community Development, Building Division in accordance with Title 21, CCC. Once so placed, the Tiny House is considered a 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 Port Angeles</u>	Airport Overlay District	33.07.060
Urban Residential	<u>Sequim/Dungeness Straits</u>	Urban Residential High (URH)	33.13.010
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	Port Angeles	Urban Very Low Density/Urban Low Density (VLD/LD)	33.13.050
Urban Moderate Density	Port Angeles, Straits	Urban Moderate Density (MD)	33.13.060
Open Space Overlay	Port Angeles	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 provider
- 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	Lot Width	Required Setbacks'				Lot Coverage	Building Height (feet)	Residential Density	
			Front			Side (each)				Rear
			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 multifamily residences regardless of the	50'	20'	25'	35'	10'	15'	50%	50'	4 du/acre without TDR ² OR up to with TDR 16 du/acre

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,

33.40.100 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.

(4) *Recording.* To ensure continued compliance with ~~owner-occupancy and other~~ ordinance requirements by current, as well as any subsequent owners, a registration of the accessory housing unit in the form of a notice to title shall be filed and recorded with the Clallam County Auditor. The notice to title shall be on a form provided by the Administrator and filled out completely by the applicant prior to filing. The notice to title shall run with the land and serve as notice to all future purchasers/owners of the subject property of the presence of the accessory housing unit and applicable restrictions regarding accessory housing units contained in the Clallam County Code. Proof of registration, in the form of a copy of the filed document, shall be submitted to the Department of Community Development prior to issuance of a certificate of occupancy. Said registration may only be removed upon a demonstration to the Department of Community Development that the accessory housing unit has been lawfully removed from the subject property, or 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](#).

(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.

(6) *Density.* Outside of designated Urban Growth Areas, there shall be no more than one accessory housing unit allowed per lot. In designated Urban Growth Areas, there shall be no more than two accessory housing units allowed per lot as set forth in RCW 36.70A.681.

33.50.040 Additional standards for accessory dwelling units.

(1) *Size.*

(a) *Size of Detached ADU.* Detached ADUs shall not exceed 50 percent of the gross floor area of the primary dwelling unit, nor exceed 1,250 square feet in gross floor area. This requirement shall not apply to any detached ADU 400 square feet or less or detached ADUs in designated Urban Growth Areas 1,000 square feet or less in gross floor area.

(b) *Size of Attached ADU.* Attached ADUs shall not exceed 35 percent of the gross floor area of the primary dwelling unit. This requirement shall not apply to any attached ADUs in designated Urban Growth Areas 1,000 square feet or less in gross floor area.

(3) *Occupancy.*

(a) Outside of designated Urban Growth Areas, ~~T~~the owner of the parcel shall live either in the primary dwelling or ADU as their primary residence. For the purpose of this standard, "primary residence" shall mean occupancy by the underlying property owner for no less than 120 days during a calendar year.

(b) ADUs may be used for occupation by family members, guests, renters, lessees, and estate caretakers/groundskeepers.

(c) Either the primary dwelling or ~~the one~~ ADU may be used as a vacation rental, as defined in Chapter 33.51 CCC, but not more than one both.

(4) *Design.* ADUs shall be designed so that the appearance of the lot remains that of a single-family residential development through the following standards:

(a) Outside of designated Urban Growth Areas, ~~W~~hen development abuts or is accessed by a county road, all building entrances shall be located so that only one entrance faces the road frontage of the development.

(b) Unless located within a designated Urban Growth Area and within ½ mile of a major transit stop, ~~O~~n-site parking area shall be provided.

(c) Access for vehicle ingress and egress shall share the same legal access onto a public or private road as the primary dwelling unit and no new access shall be established for the ADU.

(d) The primary dwelling and the ADU may be no more than 300 linear feet from each other.