

# AGENDA

## Clallam County Planning Commission

**Planning Commission Meeting of Wednesday, February 18, 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:** February 4, 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 Reandeu; Janice Wilson; Vacancy  
**Department of Community Development Staff:**  
Donella Clark, Principal Planner; Bruce Emery, DCD Director

## MINUTES

### Clallam County Planning Commission

*Meeting of February 4, 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, Vice Chair Hester, Ken Reandeau, Tom Butler, Ron Long, and Warren Billups. 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.
- E. **APPROVAL OF MINUTES:** Commissioner Long motioned to approve the minutes and Commissioner Reandeau seconded. Motion passed with two abstentions.
- F. **ANNOUNCEMENTS:** None.
- G. **PUBLIC COMMENT PERIOD:** None.
- H. **UNFINISHED BUSINESS:** None.
- I. **PUBLIC HEARING ITEM:** Continued hearing on Comprehensive Plan Update. Commissioner Long motioned to continue the hearing until February 18 with Commissioner Butler seconding. Motion passed.
- J. **WORK SESSION ITEMS:** Director Emery began by asking to add language in Section 31.02.220 that adds the process of a UGA swap that was passed by the Legislature in 2024. This added language will allow the County to keep options open for future changes. Specific language will be provided in the next packet. The Commissioners then went through the definition section proposed. There was a question regarding the use of the word "housekeeping" that was proposed in the definition of household. Director Emery will ask the consultants to confirm this was not a typo. Commissioner Gale asked about the definition of Permanently supported housing and that it seems like it should be similar to transitional housing. The language previously proposed requires that standards be made with criteria of where these types of uses will go. Commissioner Billups questioned why we have both definitions 48 and 104 instead of just calling it a household unit. Commissioner Hester wanted to confirm that the definition of vacation rental did not make RV's an allowed use in conflict with the adopted ordinance, and because RV's are not a dwelling it does not. Definition 112 was requested to be modified by Commissioner Butler to treat it like an RV is not place permanently.  
  
The Commissioners then reviewed Table 3 with the public comments. All agreed the language regarding the conversion of the County fleet was too limiting. Discussion regarding Commercial Forest land conversion ended with an elimination of the changes proposed. Commissioners made specific recommendations to clarify meanings and words of the comments and will continue this review at the next meeting.
- K. **PUBLIC COMMENT PERIOD:** Carrie from Joyce requested that Director Emery attend one of the County Commissioner Q&A sessions to discuss the regulations regarding RV's and the proposed changes.
- L. **DISCUSSION OF PUBLIC COMMENTS:** Director Emery stated he is working with the Commissioners to put him on the schedule February 24<sup>th</sup> 11am. Commissioner Reandeau suggested visual aids of the current code and where it is headed would be helpful.

- M. **GOOD OF THE ORDER:** Commissioner Hester asked if as a Planning Commissioner they could post information regarding the upcoming Planning Commission meetings on their Facebook. It was agreed if the information was factual and merely associated with what is on the agenda with no opinions aired this might generate some additional public comments at the meetings.
- N. **ADJOURNMENT:** The meeting adjourned at \_\_8:10 p.m.\_\_

## Clark, Donella

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**From:** Gores, Loni  
**Sent:** Friday, February 6, 2026 12:45 PM  
**To:** Ozias, Mark; Johnson, Randy; French, Mike  
**Cc:** Emery, Bruce; Clark, Donella  
**Subject:** FW: Correspondence for February 9, 2026 BOCC Work Session – Agenda Items 4a–4b  
**Attachments:** 2.9.26 BOCC Meeting agenda item 4a-4b.pdf

See attached.

DCD,  
It was requested to send to the Planning Commission. Please sent the email to them.

Thanks, LG

*Loni Gores  
Clerk of the Board  
Commissioners Office  
223 East 4<sup>th</sup> Street, Suite 4  
Port Angeles, WA 98362  
Phone: 360-417-2256*

**From:** Dr. Sarah Huling, EdD, MBA <triplesconsultants2025@gmail.com>  
**Sent:** Friday, February 6, 2026 11:04 AM  
**To:** Gores, Loni <loni.gores@clallamcountywa.gov>  
**Subject:** Correspondence for February 9, 2026 BOCC Work Session – Agenda Items 4a–4b

Dear Loni,

I am writing to request that the attached correspondence be included in the Board of County Commissioners' materials for the February 9, 2026, Commissioner Work Session, specifically related to Agenda Items 4a and 4b.

The attached memo is intended to support the Board's discussion by providing context on how Agenda Items 4a (Code Enforcement Performance Report) and 4b (RV-related zoning amendments) intersect, and how those items relate to broader questions of code clarity, sequencing, and alignment across the Clallam County Code. The correspondence is informational and framework-focused, and is not intended to advocate for a specific policy outcome.

Please also copy the Planning Commission on this correspondence for informational purposes, as the issues addressed relate directly to the Commission's advisory role on development regulations and Comprehensive Plan implementation.

Thank you for your assistance in ensuring this material is available to the Board for the upcoming work session. Please let me know if you need anything further from me.

Sincerely,  
Sarah Huling, EdD, MBA  
Clallam County District III Constituent  
Triple S Consultants, LLC



## WORK SESSION

### BOARD OF CLALLAM COUNTY COMMISSIONERS

223 East 4<sup>th</sup> Street, Room 160  
Port Angeles, Washington  
February 9, 2026

Board of Clallam County Commissioner meetings will also be available virtually at:

If you would like to participate in the meeting via Zoom audio only, call 253-215-8782 and use meeting ID: 836 9266 4344 and passcode: 12345 and use \*9 to raise your hand.

If you would like to participate in the meeting via Zoom video conference, visit <https://us06web.zoom.us/j/83692664344> and use meeting ID: 836 9266 4344 and passcode: 12345

This meeting can be viewed on a live stream at this link: <https://clallamcountywa.gov/meetings>

Public comment can be directed to the Clerk of the Board at 360-417-2256 or [Loni.Gores@clallamcountywa.gov](mailto:Loni.Gores@clallamcountywa.gov)

#### **Administration – 9 a.m.**

- 1a Calendar/Correspondence
- 1b Resolution appointing various members to the Homelessness Task Force
- 1c Call for hearing to be held on Tuesday, March 3, 2026 at 10:30 a.m. regarding an Opportunity Fund request for Clallam County Public Works – Clallam Bay / Sekiu Pipe Replacement Project
- 1d Letter of support for the Port of Port Angeles application Marine Trades Expansion Project
- 1e Agreement with Department of Commerce for Violence Against Women STOP Grant Program
- 1f Verbal approval to use the Interlocal Purchasing System TIPS for the County Fair Rodeo Arena Grant Project
- 1g Discussion and next steps for regarding the Housing Solutions Committee recommendation regarding the Peninsula Housing Authority – Eklund at Gales Project
- 1h Pre-application questionnaire with Office of Crime Victim Advocacy for Victim Witness Assistance DV Specific Grant

#### **Budget**

- 2a Discussion on proposed budget reductions to be considered on February 24 (3a)\*
- 2b Discussion of proposed supplemental appropriations to be considered on February 24 (3b)\*
- 2c Discussion of proposed debatable emergencies to be considered on February 24 (3c)\*

#### **Public Works**

- 3a Dungeness National Wildlife Refuge Access Improvement DNWR Project update

#### **Community Development**

- 4a Code Enforcement update
- 4b Briefing and next steps regarding the proposed RV Ordinance addressing the residential use and occupancy of Recreational Vehicles

#### **Board of Commissioners**

- 5a Boundary Review Board discussion
- 5b Agreement amendment for Salish Behavioral Health Administrative Services Organization
- 5c Legislative session update

**General Discussion/Items for Future Agendas**

- ONP and ONF updates (3/2/26 at 10 and 10:30 a.m.)
- Joint Meeting with the Department of Natural Resources (3/16 at 1 p.m.)
- Department of Transportation Highway 101 Projects (3/23 at 9 a.m.)
- Joint Meeting with the Port of Port Angeles (4/27 at 11 a.m. Hosted at Port)
- Joint Meeting with the Department of Natural Resources (6/15 at 1 p.m.)
- Department of Transportation Highway 101 Projects (6/22 at 9 a.m.)
- Joint Meeting with the Department of Natural Resources (8/17 at 1 p.m.)
- Department of Transportation Highway 101 Projects (9/14 at 9 a.m.)
- Joint Meeting with the Port of Port Angeles (10/26 at 11 a.m. Hosted at BOCC)
- Joint Meeting with the Department of Natural Resources (11/9 at 1 p.m.)
- Department of Transportation Highway 101 Projects (12/7 at 9 a.m.)

**EXECUTIVE SESSION**

The Board may recess into Executive Session to consider employment or dismissal of personnel, to review the performance of a public employee, to consult with legal counsel, to consider the position to be taken in collective bargaining, to consider acquisition or sale of real estate, or other matters per RCW 42.30.110.

- Other items may be added at the discretion of the Board and additional Work Sessions may be scheduled if more time is needed to allow for adequate discussion.
- Written testimony presented by members of the public during the Board meeting is considered a public document and must be submitted to the Clerk of the Board. Copies of public documents from Board meetings are available by contacting the Public Records Department.

**Attachment:** Context for Agenda Items 4a–4b, Code Enforcement, Zoning Scope, and County Code Alignment

**Purpose:** This attachment is provided to support the Board of County Commissioners' February 9, 2026, Work Session discussion of Agenda Items 4a (Code Enforcement Performance Report) and 4b (RV-related zoning amendments) by clarifying how these items intersect and how they relate to ongoing efforts to improve internal consistency and clarity within the Clallam County Code.

**Agenda Item 4a.** Code Enforcement Performance Report: Agenda Item 4a reflects ongoing enforcement practices established under a 2023 Memorandum of Understanding (MOU) among the BOCC, Department of Community Development, Sheriff's Office, Environmental Health, and Prosecuting Attorney. The report documents enforcement activity across multiple titles of the County Code, including zoning, building, environmental health, critical areas, and solid waste.

Key observations relevant to the work session include:

1. Code Enforcement now operates as a multi-departmental function, not a zoning-only activity.
2. Enforcement actions routinely rely on multiple code titles, depending on the nature of the impact (health, safety, utilities, environment, or land use).
3. Several cases involving recreational vehicles and similar uses were identified as on hold pending resolution of zoning questions, indicating that enforcement certainty is closely tied to how Title 33 is structured and interpreted.

Agenda Item 4a demonstrates that enforcement capacity exists and is active, but that clarity and alignment across code titles directly affect enforcement efficiency and consistency.

**Agenda Item 4b.** RV-Related Zoning Amendments: Agenda Item 4b raises questions regarding the role of Title 33 (Zoning) in addressing issues that may also be governed elsewhere in the County Code, including sanitation, utilities, fire safety, building standards, and environmental protection.

Recent public input and Planning Commission discussion indicate that proposed zoning amendments are being evaluated not only on their substantive effect but also on whether zoning is the appropriate regulatory tool rather than existing authorities in other titles.

**Relationship Between Agenda Items 4a and 4b.** Taken together, Agenda Items 4a and 4b illustrate a structural issue rather than a single-use issue:

1. Agenda Item 4a shows that enforcement is already multi-title and operational, but often relies on zoning classifications as an initial trigger.
2. Agenda Item 4b reflects efforts to resolve enforcement uncertainty by expanding or clarifying zoning provisions, which may unintentionally place non-land-use concerns within Title 33.

This interaction suggests an opportunity to clarify:

1. the intended scope of zoning versus other regulatory titles, and
2. how enforcement decisions are routed when multiple titles apply.

**Relevance to County Code Clean-Up and Alignment Efforts.** Clallam County has previously expressed interest in improving code clarity, internal consistency, and public understanding. The current work session items align with that objective by highlighting:

1. the need to distinguish state-mandated requirements from discretionary local regulation,
2. the importance of sequencing code amendments to avoid piecemeal expansion, and
3. the value of ensuring that zoning regulations focus on land-use siting and compatibility, while other titles address health, safety, utilities, enforcement, and emergency authority.

Improved alignment across code titles may reduce reliance on zoning as a default enforcement tool and support more consistent application of existing authorities.

Agenda Items 4a and 4b provide a timely opportunity for the Board to consider how enforcement practice, zoning scope, and code organization interact. Clarifying these relationships at a framework level may support future policy discussions, reduce public confusion, and improve administrative efficiency without predetermining specific regulatory outcomes.

**Table: Illustrative Mapping of Enforcement Concerns to Clallam County Code, Including State Mandate, Discretion, Risk if Misapplied, RCW, and GMA Authority**

| <b>Common Concerns Raised in RV / Alternative Housing Discussions</b> | <b>State-Mandated or Discretionary?</b> | <b>Primary CCC Title / Chapter Addressing the Concern</b>                         | <b>Key RCW / GMA Authority (Illustrative)</b>  | <b>Role of Title 33 (Zoning)</b> | <b>Risk if Misapplied to Zoning</b>                                     | <b>Notes on Alignment</b>  |
|---|---|---|--|----------------------------------|---|--|
| <b>Sanitation, sewage disposal, wastewater</b>                        | State-mandated                          | CCC Title 13 (Water & Sewer); CCC Title 41 (Utilities); Environmental Health regs | RCW 70A.100 (sewage systems); RCW 70.05 (local health authority); <i>GMA not primary</i> | Indirect only                    | Zoning becomes a proxy for health enforcement; inconsistent application | Sanitation is regulated through the health and utility authority, not GMA land-use planning. |
| <b>Potable water supply</b>   | State-mandated                          | CCC Title 13; CCC Title 41  | RCW 70A.125 (safe drinking water); <i>GMA not primary</i>                                | Indirect only                    | Denial based on assumptions rather than system capacity                 | Water adequacy is a utility determination, not a zoning classification.                      |
| <b>Fire risk and emergency access</b>                                 | State-mandated                          | CCC Title 7 (Roads & Access); adopted Fire Code                                   | RCW 19.27 (State Building & Fire Codes); <i>GMA secondary</i>                            | Indirect only                    | False sense of safety if zoning substitutes for fire standards          | Fire safety is enforced through building and fire codes, not land-use policy.                |
| <b>Building safety / structural integrity</b>                         | State-mandated                          | Adopted State Building Codes (via CCC Title 11 & references)                      | RCW 19.27 (State Building Code Act); <i>GMA not applicable</i>                           | Indirect only                    | Unsafe structures persist despite zoning compliance                     | Structural integrity is not governed by the GMA.   |

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| <b>Environmental impacts (critical areas, runoff, habitat)</b> | State-mandated       | CCC Title 13 (Environmental Protection)               | RCW 36.70A.060 (critical areas); RCW 36.70A.170–.172      | Indirect only | Environmental harm is displaced rather than mitigated      | This is a core GMA requirement, implemented through environmental regulation.  |
| <b>Solid waste accumulation</b>                                | State-mandated       | CCC Title 13; Environmental Health regs               | RCW 70A.205 (solid waste); <i>GMA not primary</i>         | Indirect only | Zoning is used punitively instead of correcting conditions | Solid waste regulation arises from environmental and health statutes, not GMA. |
| <b>Junk or abandoned vehicles</b>                              | State-mandated (RCW) | CCC nuisance/vehicle chapters; enforcement provisions | RCW 46.55 (abandoned vehicles); <i>GMA not applicable</i> | None          | Zoning overreach; unequal enforcement                      | Not a land-use planning issue under GMA.                                       |
| <b>Overcrowding / unsafe living conditions</b>                 | State-mandated       | Environmental Health Authority; Fire & Building Codes | RCW 70.05; RCW 19.27; <i>GMA not primary</i>              | Indirect only | Displacement without remediation                           | Health and life-safety standards govern occupancy risk, not GMA.               |
| <b>Emergency or imminent hazards</b>                           | State-mandated       | CCC Title 25 (Emergency Management)                   | RCW 38.52 (Emergency Mgmt Act); <i>GMA not applicable</i> | None          | Delay if zoning compliance is mistaken for safety          | Emergency authority is independent of land-use planning.                       |

|   |                                   |   |  |                       |   |  |
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| <b>Enforcement authority and penalties</b>                    | State-mandated                    | CCC Title 3 (Administration/Enforcement); CCC Title 26 (Civil Violations) | RCW 36.32.120; RCW 7.80                      | None                  | Enforcement paralysis from misrouting authority         | Enforcement mechanisms exist outside the GMA planning authority.         |
| <b>Neighborhood compatibility (setbacks, density, siting)</b> | Discretionary (within GMA bounds) | CCC Title 33 (Zoning); CCC Title 23 (Land Division)                       | RCW 36.70A.040; .070(1), (2), (5)            | Primary role          | Over-regulation creates exclusionary outcomes           | This is the primary and appropriate application of GMA zoning authority. |
| <b>Length of stay/residency duration</b>                      | Discretionary local policy        | CCC Title 33 (only if adopted)  | <i>No direct GMA mandate</i>                 | Direct only if chosen | High litigation risk; regulates people rather than land | Requires a strong nexus to Comp Plan policies.                           |
| <b>Use-based prohibition of RVs as dwellings</b>              | Discretionary local policy        | CCC Title 33 (only if adopted)  | RCW 36.70A.070 (policy consistency required) | Direct only if chosen | Displacement; GMA inconsistency risk                    | Must be supported by explicit Comp Plan policy and findings.             |

\*State-mandated refers to the regulatory authority that the County is required to implement under state or federal law. Discretionary refers to the authority the County may exercise locally, subject to the Growth Management Act and adopted Comprehensive Plan policy.

\*Risk if Misapplied refers to governance, legal, enforcement, or public-trust risks that may arise when an issue is regulated through zoning rather than through the primary code authority designed to address it.

\*RCW and GMA references are illustrative and intended to identify sources of authority, not to serve as an exhaustive legal inventory.



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Department of Community Development  
County Courthouse  
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Port Angeles, WA 98362-3015  
Phone: (360) 417-2323  
Fax: (360) 417-2443  
[bruce.emery@clallamcountywa.gov](mailto:bruce.emery@clallamcountywa.gov)

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### Memorandum

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**Date:** February 10, 2026  
**To:** Clallam County Planning Commission  
**From:** Bruce Emery, Director of Community Development  
**Re:** Planning Commission CPU Continued Public Hearing, 02/18/2026

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Hello Planning Commission Members. The public hearing for the CPU will continue on February 18, 2026. I look forward to continuing the good work. PLEASE NOTE: as requested by the Planning Commission members, please bring with you Table 3, Table 4, and the Commerce Checklist, as provided in your February 4, 2026, meeting packet. This will help reduce confusion (and reading). The additional documents included in the current packet are merely to memorialize what was accomplished since the February 4<sup>th</sup> meeting.

**Table 3.** The Planning Commission took a detailed look at the first 12 pages of Table 3 at the previous meeting. Our hope is to continue that work, starting on Page 13, Amendments to 31.02.820(7)(b). An excerpt from the Table 3, post-2/4/26 meeting is included in your packet simply to memorialize the changes made as instructed by the PC. We can go over this if there are any questions or if I lost something in translation.

**Table 4 and Commerce Checklist.** We have yet to start this review. Please come with your questions and ideas. Remember that Table 4 is in direct response to the Commerce Checklist. Both were included in your 2/4/26 meeting packet. We are still working with the consultants to provide recommended responses to the six remaining, unaddressed items identified by Commerce in the Checklist.

**UGA Swaps.** Your packet includes an excerpt from the GMA (RCW 36.70A.110(8)). This section was adopted in 2024 under Senate Bill 5834. Prior to its passage, the strict designation criteria included in the remainder the Section .110, restricted jurisdictions from expanding a UGA boundary to circumstances where essentially there was no more room for growth to occur. It was soon understood that for reasonable growth to occur, other factors than just parcel, or density availability, had to be considered.

With the adoption of Subsection (8), the Legislature recognized that “patterns of development” was also a legitimate consideration for determining adequate capacity to accommodate growth. For example, if the pattern of development resulted in a series of scattered small parcels ineffectively served by infrastructure, the community’s industrial land base may not be adequate to serve the future economic development need of the community even though the aggregate total of those scattered parcels show sufficient

area. The mechanism the new legislation allows is for the County to expand the area of a UGA and land use designations therein to meet the needs of the community, provided a commensurate area is reduced in another UGA with the same land use designation—hence the term “UGA Swap.” The new legislation includes 10 criteria that must be satisfied for a UGA Swap to be allowed (see enclosed).

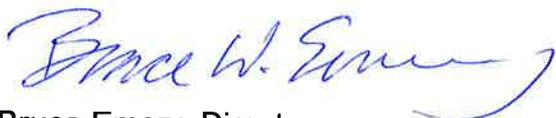
Enclosed is a draft amendment to Section 31.02.220, CCC, *Urban Growth Area Amendment Process*, that incorporates the new legislation as an additional option for amending UGA boundaries. Rather than spell out all ten criteria, we felt it best to simply cite the section as an alternative consideration, allowing for future amendments to the section without the need to further amend our process.

**Reference to Parks Comprehensive Plan.** The Parks, Fair and Maintenance Department, along with the Parks Advisory Committee, are currently in the process of updating the Parks Comprehensive Plan (formerly *Park and Recreation Plan*). As part of their review, they have requested that the document be officially referenced in the Comprehensive Plan. To achieve this, the following is suggested as a new subsection 31.02.300(6)(e): Although not required as a GMA document pursuant to RCW 36.70A.070(10), Clallam County does plan for and manage park facilities under its Parks Comprehensive Plan. The Plan maintains an inventory of park and recreation facilities owned and managed by Clallam County, identifies ongoing/future maintenance needs and costs, projects future park and recreation facility needs, and identifies funding sources needed to meet current and projected facility demands. The Parks Comprehensive Plan is incorporated herein by this reference.

**Other Items.** Revisions to the Draft Zoning Code have been included for your review along with changes (highlighted in yellow) directed by the Planning Commission on February 4<sup>th</sup>. These changes also include changing the naming convention for the *Clallam County Park and Recreation Plan* to the *Clallam County Parks Comprehensive Plan*. Unless additional discussion is warranted, the document is complete for your recommendation. Also, your packet includes draft Findings for a recommendation of approval of the Comprehensive Plan Update. This is more of a legal document meeting part of the County’s requirement for stating its findings that the CPU meets the requirements of the GMA. We recommend this be included in the packet to the BOCC, once the Planning Commission’s work is complete.

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](mailto:bruce.emery@clallamcountywa.gov).

Sincerely,



Bruce Emery, Director  
Clallam County DCD

# CPU Policy Response Table 3: Public/Agency Testimony

## Clallam County Comprehensive Plan Update Summary of Public Testimony and Corresponding Recommendations as of February 5, 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). <del>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.</del></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). <del>Pursue the development of a new highway connection from Neah Bay to Ozette along or near the coast.</del></p>   |

### CPU Policy Response Table 3: Public/Agency Testimony

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|---|---|
| <p>consistent with the 6-Year TIP that includes a project for a "Preliminary Study for Neah Bay to Forks Road."</p>   | <p>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,<br/>         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): <del>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.</del></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,<br/>         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)(v): <u>"For local access roads <del>where</del> 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 <del>considered</del> utilized consistent with adopted AASHTO Guidelines <del>for the implementation of such features</del>; provided, said design standards do not conflict with locally-adopted design standards."</u></p>  |
| <p>2. b) Clallam County Public Works,<br/>         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): "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, <u>with following implementation of increased resiliency in energy generation and transmission</u>, the County should explore grant funding and other resources for the transition of the County's <u>small</u> vehicle fleet</p>   |

### CPU Policy Response Table 3: Public/Agency Testimony

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| <p>local energy sources. Otherwise, it leaves the community vulnerable.<br/> <b>Change rejected by PC, 2/4/26</b></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.<br/> <b>Rejected by PC, 11/19/25.</b></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. <b>Rejected by PC 2/4/26.</b></p>   | <p>Proposed edits to CCC 31.02.140(1). “Retain <u>and prevent conversion of designated commercial/suitable</u> forest land in the County in <del>commercial</del> 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>. <b>Rejected by PC 2/4/26.</b></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

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| <p>better align with WAC 197-11-768, 365-190-080 and 365-196-830.</p>  | <p>obliterates entire minesite ecosystems, but this loss can be <del>mitigated</del><u>minimized</u> with carefully sequenced reclamation. The effects of 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 <del>adequate</del> 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><del>mitigated</del>.”</p>   |
| <p>4. h) Washington Department of Fish and Wildlife, 11/5/2025. Reflects language and intent of WAC 365-190-080 and 365-196-830.</p>   | <p>Proposed edits to CCC 31.02.340(1)(c). “The critical areas ordinance shall be utilized by Clallam County to help achieve environmental objectives <u>including no net loss of critical area function and values</u>, prevent environmental degradation, and to manage land use activities within the natural and intrinsic constraints of the landscape...”</p>  |
| <p>4. i) Washington Department of Fish and Wildlife, 11/5/2025. Proposed language is internally consistent with prevention being less problematic than restoration. <b>Rejected by PC 2/4/26, this portion only.</b></p> | <p>Proposed edits to CCC 31.02.340(1)(e). “Clallam County shall work with other agencies, tribes and individuals to <u>prevent additional listing proactively protect populations</u> of fish, wildlife and plants under the Endangered Species Act through pro-active (rather than reactive)</p>   |

### CPU Policy Response Table 3: Public/Agency Testimony

| This portion accepted by PC 2/4/26.   | planning and implementation of proper land use practices and conservation measures.”   |
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| <p>4.j) Washington Department of Fish and Wildlife, 11/5/2025. Given the process identified earlier under Comment # 1.c, staff does not support this change.</p>  | <p>Proposed edits to CCC 31.02.340(1)(f). “Clallam County shall prioritize <del>culvert replacement and similar issues that presently result in identifying and removing</del> barriers to fish passage <u>including undersized or degraded culverts</u> as part of the Six-Year Transportation Improvement Plan (TIP) process.”</p> <p>Note, changes made pursuant of Testimony 1.c, above, captured the above recommended language with the inclusion of “degraded.”</p>   |
| <p>4.k) Washington Department of Fish and Wildlife, 11/5/2025. Proposed language that establishes consistency with CCC 35.20.270(4) and climate policies of CCC 31.02.820. Staff recommends Subsection (c) be amended to read: “...<u>locate and ensure the design of new development is conditioned to avoid...</u>” as a regulatory agency, Clallam County does not design a project, but ensures the project meets regulation.</p> | <p>Proposed edits to CCC 31.02.340(6).</p> <p>(a) <i>Policy 16.</i> “Clallam County <del>should</del><u>will</u> work to <del>implement</del><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 <u>protect, 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

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|   | <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.<br/><b>Rejected by PC, 2/4/26.</b></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 <b>and limit development within these areas.</b> Flood control measures should <del>reserve</del><u>preserve ecological and community benefits such as floodplain functions and public access opportunities to the fullest extent possible <del>opportunities for other uses, including public access.</del></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). <b>“Avoid and Minimize</b> 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 <del>habitat</del> 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 <b>U.S. Fish and Wildlife Service</b><del>Washington Department of Wildlife</del> 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). <b>Rejected by PC, 2/4/26.</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 <b>and retrofitting existing buildings</b> and stormwater runoff...”</p>   |

## CPU Policy Response Table 3: Public/Agency Testimony

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| <p>4.r) Washington Department of Fish and Wildlife, 11/5/2025. Staff concurs that maintaining larger tracts of land is integral to ecosystem health and one of the key benefits provided by forest lots.</p>   | <p>Proposed edits to CCC 31.02.820(7)(b). "Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate refugia and critical habitats to strive for no net loss of ecosystem attributes, with a focus on achieving net ecological gains. Expand habitat protection, quality, and connectivity through designations such as conservation areas, expanded buffers, <u>maintaining large blocks of commercial and private forest lands</u>, greenbelts, wildlife and open space bridges and corridors. Incorporate climate considerations in determining permissible activities within wetlands and wildlife habitats."</p> |
| <p>5) Emailed testimony received from Phyllis Sprinkle, 11/8/25. Supports adoption of policies for the protection of nighttime sky from the impacts of glare, consistent with recommendations from DarkSky Olympic Peninsula (see Public Comment, # 44).</p> | <p>Changes already included under CCC 31.02.340(11)(b).</p>   |
| <p>6) Emailed testimony received from Nancy Field, 11/8/25. Same as # 5, above.</p>  | <p>Changes already included under CCC 31.02.340(11)(b).</p>   |
| <p>7) Emailed testimony received from Pete Saari, 11/9/25. Same as # 5, above.</p>   | <p>Changes already included under CCC 31.02.340(11)(b).</p>   |
| <p>8) Emailed testimony received from John Gussman, 11/10/25. Same as # 5, above.</p>  | <p>Changes already included under CCC 31.02.340(11)(b).</p>   |
| <p>9) Emailed testimony received from Jan Standish, 11/10/25. Same as # 5, above.</p>  | <p>Changes already included under CCC 31.02.340(11)(b).</p>   |
| <p>10.a) Jamestown S'Klallam Tribe, November 19, 2025. Definitions.</p>  | <p>Propose new definition under CCC 31.02.050(18F): "<u>Environmental Justice</u>" means the fair treatment and meaningful involvement of all <u>people regardless of race, color, national origin, tribal affiliation, disability</u></p>  |

## CPU Policy Response Table 3: Public/Agency Testimony

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| <ul style="list-style-type: none"> <li>• Add definition for “Environmental Justice (recommends using Dept. of Commerce’s definition).”</li> </ul> <p><b>Full definition rejected by PC on 2/4/26. Recommend alternative as included.</b></p>   | <p><u>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.</u></p> <p><u>Alternative Definition under 31.02.050(18): “Environmental Justice” shall carry the same meaning as set forth under RCW 36.70A.030(17), as now or hereafter amended.</u></p> |
| <ul style="list-style-type: none"> <li>• Define “Best Available Science.”</li> </ul> <p><b>Full definition rejected by PC on 2/4/26. Recommend alternative as included.</b></p>  | <p><u>Recommend a new Section 31.02.050(7):</u><br/> <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>  |
| <ul style="list-style-type: none"> <li>• 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</li> </ul> | <p><u>Recommend a new Section 31.02.050(7): “Best Available Science (BAS)” shall carry the same meaning as set forth under WAC 365-195-900 through 925, as now or hereafter amended.</u></p> <p><u>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 <del>that support gathering spaces, civic institutions,</del> and integrational continuity. These areas promote social cohesion by maintaining development scales and zoning that reinforce community interaction, volunteerism, and locally rooted traditions.”</u></p>                              |

### CPU Policy Response Table 3: Public/Agency Testimony

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| <p>connection, clarify that this would be through focused or targeted zoning in already developed areas. <b>Change rejected by PC, 2/4/26.</b></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.<br/><b>Language modified by PC, 2/4/26</b></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. Propose new Section 31.02.340(1)(h): "Policy 87. 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 <del>acquisition and</del> protection of lands that provide high-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"> <li>• Include a Section that clearly indicates that local Tribes be included in the planning process before development agreements are completed.</li> <li>• Amend Section (g) to recognize need for preservation of agricultural and forest lands, and sensitive habitats when considering MPRs.</li> </ul> <p><b>Portion under (1)(k), modified by PC; portion under (1)(g), rejected by PC 2/4/26.</b></p> | <p>Propose new Section CCC 31.02.250(1)(k): "<u>Local tribes will be provided notice of applications and will be included in the planning process before any development agreements or approvals are granted for a master planned resorts.</u>"</p> <p>Propose edits to Section CCC 31.02.250(1)(g): "The County finds that the land is <del>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.</del>"</p> |
| <p>10.d) Jamestown S'Klallam Tribe, November 19, 2025. Amend Environment and Open Space Policies (31.02.340):</p>  | <p>Propose edits to Section 31.02.340(1)(b): "Prevention is less expensive than <del>cleaning</del><u>reversing up</u> pollution and <u>ecosystem impacts</u> later. Clallam County should consider the potential impacts and costs of treatment, <del>or</del> remediation and restoration <del>for</del> environmental</p>   |

## CPU Policy Response Table 3: Public/Agency Testimony

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| <ul style="list-style-type: none"> <li>• 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."</li> <li>• 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 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."</li> <li>• 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."</li> <li>• 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</li> </ul> | <p>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&amp;W (# 4. i, above) already changed the dynamic of the section.</p> <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> |
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## CPU Policy Response Table 3: Public/Agency Testimony

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| <p>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> <p><b>Change rejected by PC, 2/4/26.</b></p>  | <p>i. <u>Updating aquifer mapping and flow patterns focusing on vulnerability assessments related to sea level rise and saltwater intrusion.</u></p> <p>ii. <u>Analyzing the impacts of climate change on groundwater supply, integrating projected future water demand, and assessing the feasibility of groundwater supplementation.</u></p> <p>iii. <u>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>  |
| <p>10.e) Jamestown S’Klallam Tribe, November 19, 2025. Amend Climate Change and Resiliency Goals and Policies (CCC 31.02.820):</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Language modified by PC, 2/4/26.</b></p> <ul style="list-style-type: none"> <li>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,</li> </ul> | <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> |

## CPU Policy Response Table 3: Public/Agency Testimony

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| <p>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.”</p> <ul style="list-style-type: none"> <li>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.”</li> <li>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 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.”</li> </ul> <p><b>Language modified by PC, 2/4/26.</b></p> <ul style="list-style-type: none"> <li>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,</li> </ul> | <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 <del>expanding low-income energy assistance programs, promoting existing weatherization incentives and assistance</del>, upgrading cooling infrastructure in facilities serving vulnerable populations, and implementing alternatives like <u>preserving and increasing tree cover, and adding shade structures and other passive cooling and heating 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 <del>plans to protect salmonoid habitats</del> (transportation, water, sewer, electricity <u>and zoning</u>) <u>plans to protect</u></p> |
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## CPU Policy Response Table 3: Public/Agency Testimony

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| <p>electricity and zoning) plans to protect salmonid (typo correction) habitats developed by the County in partnership with cities, Tribes, service providers, and state agencies.”</p> <ul style="list-style-type: none"> <li>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 habitat and “blue” carbon storage. Evaluate shoreline restoration and cleanup efforts, including concerns for Tribal cultural resources.”</li> </ul> <p><b>Language modified by PC, 2/4/26.</b></p> <ul style="list-style-type: none"> <li>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</li> </ul> | <p><del>salmonid habitats</del> 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 connectivity</u>, reducing invasive species, and improving watershed processes. <u>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 habitat and “blue” carbon storage. Evaluate shoreline restoration and cleanup efforts, including concerns for Tribal cultural resources.</u>”</p> <p>Propose amending Section 31.02.820(7)(b): “<i>Policy 7.2</i>: Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate <u>change-mitigating systems,refugia</u> and critical habitats <u>that provide valuable ecosystem services. At a minimum,</u></p> |
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## **Statutory Requirements concerning “UGA Swaps”**

### **RCW 36.70A.110 Comprehensive Plans—Urban Growth Areas**

(8) If, during the county's annual review under RCW 36.70A.130(2)(a), the county determines revision of the urban growth area is not required to accommodate the population projection for the county made by the office of financial management for the succeeding 20-year period, but does determine that patterns of development have created pressure for development in areas exceeding the amount of available developable lands within the urban growth area, then the county may revise the urban growth area or areas based on identified patterns of development and likely future development pressure if the following requirements are met:

(a) The revised urban growth area would not result in a net increase in the total acreage or development capacity of the urban growth area or areas;

(b) The areas added to the urban growth area are not designated by the county as agricultural, forest, or mineral resource lands of long-term commercial significance;

(c) If the areas added to the urban growth area have previously been designated as agricultural, forest, or mineral resource lands of long-term commercial significance, either an equivalent amount of agricultural, forest, or mineral resource lands of long-term commercial significance must be added to the area outside of the urban growth area, or the county must wait a minimum of two years before another swap may occur;

(d) Less than 15 percent of the areas added to the urban growth area are critical areas other than critical aquifer recharge areas. Critical aquifer recharge areas must have been previously designated by the county and be maintained per county development regulations within the expanded urban growth area and the revised urban growth area must not result in a net increase in critical aquifer recharge areas within the urban growth area;

(e) The areas added to the urban growth areas are suitable for urban growth;

(f) The transportation element and capital facility plan element of the county's comprehensive plan have identified the transportation facilities and public facilities and services needed to serve the urban growth area and the funding to provide the transportation facilities and public facilities and services;

(g) The areas removed from the urban growth area are not characterized by urban growth or urban densities;

(h) The revised urban growth area is contiguous, does not include holes or gaps, and will not increase pressures to urbanize rural or natural resource lands;

(i) The county's proposed urban growth area revision has been reviewed according to the process and procedure in the countywide planning policies adopted and approved according to RCW 36.70A.210; and

(j) The revised urban growth area meets all other requirements of this section.

### **31.02.220 Urban growth area amendment process.**

The Growth Management Act requires that urban growth areas be reviewed at least once every ten (10) years. The County-wide Planning Policies call for a review of population growth and the impact on urban growth areas once every five (5) years. In setting urban growth areas for Clallam County, a forecast of twenty (20) year urban land needs was completed. There is a need to provide stability to where urban growth and services will occur, and supply of land should be considered in any future amendments. This warrants that specific procedures and criteria be adopted to guide urban growth area amendments.

It is the general policy of this section that urban growth area boundary amendments be discouraged except for the required ten (10) year review. Urban growth area amendments should provide overwhelming evidence that there is a demonstrated need to change the designations. As such, the following procedures and criteria must be met. In those circumstances where a landowner might wish to remove land from an urban growth area, a liberal application of the criteria should be allowed due to the abundance of urban designated land.

(1) The following procedures shall be followed in review of urban growth area amendment applications:

(a) The amendment shall be considered an amendment of the Comprehensive Plan. The procedures for public notice, timing of applications and public hearings outlined in Chapter 31.08 CCC shall be followed.

(b) The County shall consult with the appropriate city concerning the Comprehensive Plan changes that may be needed to implement the urban growth area boundary amendment.

(c) Amendment applications can be made by Clallam County or a city with a planning area that includes or is contiguous to the property; or the owners of the property included in the application or a group of more than 50 percent of the property owners who own more than 50 percent of the land area in each area included in the application.

(2) Applications for amendment of urban growth area boundaries, or the establishment of new urban growth areas, shall meet the following criteria:

(a) The applicant shall demonstrate that there is a need to accommodate the 20-year population and employment growth of that area. The following information should be supplied:

(i) Revised 20-year population and/or employment forecast demonstrating increased growth due to births, deaths and/or migration, or employment opportunities.

(ii) Information pertaining to specific historical growth and employment patterns since the last population or employment forecast provided by the County.

(b) A demonstrated need for additional land to accommodate the population and/or employment growth. The following information should be supplied:

(i) An inventory of net developable land within the existing urban growth boundary and proposed urban growth boundary.

(ii) Market availability, ownership and parcelization of net developable land within the existing urban growth boundary and proposed urban growth boundary.

(c) The amendment provides for a net improvement in the efficiency of public facilities and services, including but not limited to, water, sewage, transportation, drainage, parks and recreation.

(d) The amendment is compatible with nearby resource land (agricultural, forestry or mining) uses.

(e) The amendment meets the requirements in CCC [31.02.230](#) for the designation of urban growth areas.

(f) The amendment does not meet all criteria specified under CCC 31.02.220(2)(a) through (e), but does satisfy the criteria specified under RCW 36.70A.110(8), as now or hereafter amended.

**Clallam County Comprehensive Plan Update  
Draft Amendments to the Zoning Code, Title 33, CCC  
(Draft 02/10/2026)**

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 ~~u~~Unit" means any building or any portion thereof which is lawfully established~~intended~~ ~~and~~or designed to be used, rented, leased, let or hired out to be occupied for living purposes having independent living facilities for one or more persons~~family~~ 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 ~~residential~~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 or household 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.

**(1194)** “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,**

| <b>Comprehensive Plan Designation</b> | <b>Regional Plan</b>                 | <b>Zoning Designation</b>    | <b>CCC Section</b> |
|---------------------------------------|--------------------------------------|------------------------------|--------------------|
| <u>Various</u>                        | <u>Sequim/Dungeness Port Angeles</u> | Airport Overlay District     | <u>33.07.060</u>   |
| Urban Residential                     | <u>Sequim/Dungeness Straits</u>      | Urban Residential High (URH) | <u>33.13.010</u>   |
| Urban Residential                     | <u>Sequim/Dungeness Western</u>      | Urban Residential Low (URL)  | <u>33.13.020</u>   |
| Urban Low Density                     | <u>Port Angeles, Western</u>         | Urban Moderate Density (LD)  | <u>33.13.040</u>   |

|                                    |                                       |   |                           |
|------------------------------------|---------------------------------------|---|---------------------------|
| Open Space Overlay                 | <a href="#">Port Angeles</a>          | Urban Very Low Density/Urban Low Density (VLD/LD) | <a href="#">33.13.050</a> |
| Urban Moderate Density             | <a href="#">Port Angeles, Straits</a> | Urban Moderate Density (MD)                       | <a href="#">33.13.060</a> |
| <a href="#">Open Space Overlay</a> | <a href="#">Port Angeles</a>          | Open Space Overlay/Open Space Corridor (OS)       | <a href="#">33.13.070</a> |

### 33.07.070 Parks and Recreation (PR).

The purpose of the Parks and Recreation zone is to govern land uses for properties managed by Clallam County for park and recreation purposes consistent with the Clallam County Parks [Comprehensive and Recreation Master Plan](#).

(3) *Prohibited Land Uses.* Uses not consistent with the Clallam County Parks [Comprehensive and Recreation Master Plan](#) are prohibited.

(5) *Other Development Standards.*

(a) Allowed and conditional land uses must demonstrate consistency with the most recent Clallam County Parks [Comprehensive and Recreation Master Plan](#) adopted by the Board of Clallam County Commissioners.

### 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.

[NOTE: in accordance with policy 31.02.283\(3\)\(i\), the Transfer of Development Rights \(TDR\) program is currently suspended, pending the monitoring and emergence of economic conditions that are conducive to its success.](#)

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

(7) *Transfer of Development Rights.* [\[NOTE: in accordance with policy 31.02.283\(3\)\(i\), the Transfer of Development Rights \(TDR\) program is currently suspended, pending the monitoring and emergence of economic conditions that are conducive to its success. The provisions of this subsection related to the TDR program are also hereby suspended.\]](#)

(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. [NOTE: in accordance with policy 31.02.283(3)(i), the Transfer of Development Rights (TDR) program is currently suspended, pending the monitoring and emergence of economic conditions that are conducive to its success. The provisions of this subsection related to the TDR program are also hereby suspended.]

## **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> |
| <u>Group homes (16 or fewer persons)</u> | <u>C</u> | <u>C</u> | <u>C</u> | <u>A</u> | <u>A</u> | <u>X</u> | <u>X</u> |
| <u>Group homes (17 or more persons)</u>  | <u>C</u> | <u>C</u> | <u>C</u> | <u>A</u> | <u>A</u> | <u>X</u> | <u>X</u> |
| <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.

[NOTE: in accordance with policy 31.02.283(3)(i), the Transfer of Development Rights (TDR) program is currently suspended, pending the monitoring and emergence of economic conditions that are conducive to its success. The provisions of this section related to the TDR program are also hereby suspended.]

**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 <sup>2</sup> OR up to 5 du/acre with TDR  |
| S(R-III) | 9,000 square feet for single-family<br>9,000 square | 50'       | 20'                | 25'            | 35'           | 10'         | 15'  | 50%          | 35'                    | 4 du/acre without TDR <sup>2</sup> OR up to 10 du/acre with TDR |

|         |   |     |     |     |     |     |     |     |     |   |
|---------|---|-----|-----|-----|-----|-----|-----|-----|-----|---|
|         | feet plus 2,000 square feet per additional unit for duplex and multifamily residences regardless of the number of buildings   |     |     |     |     |     |     |     |     |   |
| S(R-IV) | 6,000 square feet for single-family<br>6,000 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% | 50' | 4 du/acre without TDR <sup>2</sup> OR up to 16 du/acre with TDR |

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. [NOTE: in accordance with policy 31.02.283(3)(i), the Transfer of Development Rights (TDR) program is currently suspended, pending the monitoring and emergence of economic conditions that are conducive to its success. The provisions of this subsection related to the TDR program are also hereby suspended and the full density allowed by the underlying zone is in effect.]

(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. [NOTE: in accordance with policy 31.02.283(3)(i), the Transfer of Development Rights (TDR) program is currently suspended, pending the monitoring and emergence of economic conditions that are conducive to its success. The provisions of this subsection related to the TDR program are also hereby suspended and the full density allowed by the underlying zone is in effect.]

### **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~~on-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.



RESOLUTION \_\_\_\_\_, 2026

AFFIRMING COMPLETION OF THE STATE MANDATED PERIODIC REVIEW AND UPDATE UNDER RCW 36.70A.130 THAT CLALLAM COUNTY COMPREHENSIVE PLAN AND DEVELOPMENT REGULATIONS CONTINUE TO COMPLY WITH THE STATE GROWTH MANAGEMENT ACT (GMA).

THE BOARD OF CLALLAM COUNTY COMMISSIONERS finds as follows:

1. Under the Washington State Growth Management Act (GMA), RCW 36.70A, Clallam County is required to develop and maintain a Comprehensive Plan and implementing development regulations that are consistent with the goals and other requirements of the GMA.
2. The Clallam County Comprehensive Plan and Development Regulations are subject to continuing review and evaluation under the GMA. RCW 36.70A.130(1).
3. The GMA provides two mechanisms for updating comprehensive plans and implementing development regulations:
  - a. **Mandatory GMA Periodic Review/Update.** Each county and city subject to fully planning under the GMA is required to periodically take legislative action to review and, if needed, revise their comprehensive plan and development regulations every eight years to ensure that they comply with the GMA, as per the schedule in RCW 36.70A.130.
  - b. **Annual Amendments.** In addition to the required GMA Periodic Review/Update action every eight years, local jurisdictions may consider proposed amendments on a more frequent basis. Under RCW 36.70A.130(2), local jurisdictions may consider amendments to their comprehensive plans no more frequently than once per year, with some exceptions. This is to ensure that proposed amendments are considered "concurrently so that the cumulative effect of the various proposals can be ascertained." Adoption or amendment of development regulations that do not require an amendment of the comprehensive plan are not subject to this once-a-year requirement.
4. The GMA Periodic Review/Update must be accomplished through "legislative action." Legislative action means the adoption of a resolution or ordinance following notice and a public hearing indicating at a minimum, a finding that a review and evaluation has occurred and identifying the revisions made, or that a revision was not needed and the reasons therefore (RCW 36.70A.130(1)).
5. Clallam County took legislative action to complete its last GMA Periodic Review/Update on August 7, 2018 (Resolution 82). With the adoption of Resolution 82, Clallam County affirmed that the County had reviewed and updated its countywide comprehensive plan, regional comprehensive plans, and development regulations to ensure continued compliance with the GMA. This action completed the County's last GMA Periodic Review/Update under RCW 36.70A.130.
6. Under the schedule established in RCW 36.70A.130(4), the deadline for Clallam County to take "legislative action" to comply with the latest, mandated GMA Periodic Review/Update was December 31, 2025. RCW 36.70A.130(7) allows County's additional time where substantial progress is demonstrated towards compliance for development regulations to protect critical areas. Clallam County was delayed in taking final legislative action to complete the GMA Periodic Review/Update by the December 31, 2025, deadline, but is now able to proceed with adoption. In accordance with RCW 36.70A.130(7)(a)(ii), the County has made substantial progress towards updating its protection standards for critical areas and will move to adopt said standards in less than 12 months from adoption of the Comprehensive Plan update.

7. Pursuant to RCW 36.70A.130 and .131, and WAC 365-196-610 (1)(e), the GMA Periodic Review/Update must at a minimum include:
  - a. Consideration of critical area regulations;
  - b. Analysis of urban growth areas to accommodate the urban growth projected to occur in the county based on the most recent 20-year population forecast by the state Office of Financial Management;
  - c. Review of mineral resource lands designations and mineral resource lands development regulation;
  - d. Establishment of a climate change and resiliency element and integration of the same throughout other Plan elements, regional plans and development regulations; and
  - e. Other applicable changes to the GMA since the last review that have not been addressed in the comprehensive plan and development regulations.
  
8. To assist with the GMA Periodic Update/Review, the County received state grant funding administered by the Washington State Department of Commerce for work completed between July 1, 2024, and June 30, 2025. This state funding supported County review and update efforts, including related public process, in the following primary work areas during the GMA Periodic Update/Review process:
  - a. Review and amendment of County Comprehensive Plan for consistency with updated requirements of the GMA.
  - b. Review and amendment of County development regulations for consistency with updated requirements of the GMA.
  - c. Specific review and update of County Critical Areas Ordinance consistent with updated requirements of the GMA.
  - d. Specific review and update of the Housing Element consistent with updated requirements of the GMA.
  - e. Specific development of a Climate Element and integration in other elements of the Comprehensive Plan.
  - f. Development of Findings and adoption of Resolution that the periodic Comprehensive Plan update is complete.
  
9. At the conclusion of the prior periodic review/update in August 2018, the County determined that, as amended, the Comprehensive Plan met the goals and requirements of the GMA (RCW 36.70A), as applicable at that time (Resolution 82, 2018).

*County GMA Comprehensive Plan and Development Regulations*

10. The Clallam County Comprehensive Plan has served as a guide for directing local land use policy and decision-making since adoption of the first plan in 1967.
  - a. In 1995, Clallam County adopted a comprehensive plan (Title 31 CCC) under the GMA planning framework (Ordinances 572, 573, 574, and 583) that included a County-wide Comprehensive Plan (Chapters 31.01 and 31.02 CCC) and four regional plans (see Map below)—Sequim-

Dungeness Regional Plan (Chapter 31.03 CCC), Port Angeles Regional Plan (Chapter 31.04 CCC); Straits Regional Plan Chapter 31.05 CCC), and Western Regional Plan (Chapter 31.06 CCC).

- b. The objective of the County-wide Comprehensive Plan, Chapter 31.02, is to identify goals and policies for those issues that are of a county-wide nature and provide the framework for regional comprehensive plans. Those issues that are of a county-wide nature are: forest and mineral lands, urban growth and sprawl, transportation, economic development, affordable housing, natural, historical and cultural resources, utilities and capital facilities (CCC 31.01.300).
- c. The objectives of the County's regional comprehensive plans are to implement county-wide objectives and address regional/local issues and needs more specifically (CCC 31.01.300).



- 11. The County's adopted Official Comprehensive Plan Land Use and Zoning Map and related countywide and regional comprehensive plan policies and implementing zoning regulations designate urban growth areas (UGAs), natural resource lands, and rural lands as required under the GMA pursuant to RCW 36.70A.070, .110 and .170 as summarized below:

## Clallam County General Comprehensive Plan Land Use Designations

| GENERAL LAND USE DESIGNATION     | ACRES (REV)                | % OF COUNTY (REV) |
|----------------------------------|----------------------------|-------------------|
| <b>Urban Growth Areas (UGA)</b>  | <b>21,724<sup>1</sup></b>  | <b>1.94%</b>      |
| Sequim UGA                       | 5,269 <sup>2</sup>         | 0.47%             |
| Port Angeles UGA                 | 9,220 <sup>3</sup>         | 0.83%             |
| Forks UGA                        | 4,944                      | 0.44%             |
| Carlsborg UGA                    | 559                        | 0.05%             |
| Clallam Bay-Sekiu UGA            | 1,397                      | 0.13%             |
| Joyce                            | 335                        | 0.03%             |
| <b>Natural Resource Lands</b>    | <b>640,899<sup>4</sup></b> | <b>57.44%</b>     |
| Commercial Forest                | 634,696                    | 56.88%            |
| Agriculture Retention            | 6,202                      | 0.56%             |
| <b>Rural Land</b>                | <b>100,806</b>             | <b>9.03%</b>      |
| Rural                            | 92,126                     | 8.26%             |
| Residential LAMIRDs              | 6,308 <sup>5</sup>         | 0.57%             |
| Commercial and Mixed Use LAMIRDs | 2,371 <sup>6</sup>         | 0.21%             |
| <b>Other Public Lands</b>        | <b>4,689<sup>7</sup></b>   | <b>0.42%</b>      |
| <b>Other Lands</b>               | <b>347,676<sup>8</sup></b> | <b>31.16%</b>     |
| Olympic National Park            | 313,355                    | 28.08%            |
| Tribal Reservation & Trust       | 34,322                     | 3.08%             |
| <b>COUNTY TOTAL</b>              | <b>1,115,794</b>           | <b>100%</b>       |

- 1- Calculated by adding up each individual UGAs. UGA total equals both incorporated and unincorporated UGA.
- 2- Includes 53 acres of tidelands.
- 3- Includes 2405 acres of water area (harbor) and 143 acres of ONP within City boundaries.
- 4- Commercial Forest Lands are also designated mineral resource lands of long-term commercial significance.
- 5- Includes Beaver - Lk Pleasant, Bell Hill, Bogachiel Bridge, Bullman, Cedar Glen, Cres, cent Beach, Deer Park - 4 Seasons, Diamond Point, Dungeness Bay - Marine Dr, Dungeness Meadows, East Anderson, East Sequim Bay, Hoko River, East Hoko River, West Kitchen Dick, Lake Farm, Lake Sutherland, Maxfield, NE Carlsborg, Old Beaver, Place Road, Quillayute River, Snider, Solmar – Dryke, Straits, Sunland, The Bluffs, Whitcomb/Dimmel.
- 6- Bear Creek, Beaver - Lk Pleasant, Blyn, Bogachiel Bridge , Camp Hayden, Clallam River, Deer Park - 4 Seasons, Diamond Point, Dungeness Village, Granny's Café, Indian Creek, Laird's Corner, Laird's Corner East, Lake

Sutherland, Miller Peninsula, O'Brien, Quillayute Airport, Sappho, Sequim Lodge, Silver King, Solmar – Dryke, Straits, Three Rivers, Whiskey Creek, Whitcomb/Dimmel.

7- Includes Public and Parks and Recreation zoning.

8- Olympic National Park and Tribal Reservation and Trust Lands are not subject to GMA or County Comprehensive Plan and development regulations.

12. Clallam County GMA development regulations that implement the comprehensive plan include: Consolidated Development Permit Process, Chapter 26.10 CCC; Clallam County Environmental Policy (SEPA Review), Chapter 27.01 CCC; Right to Practice Forestry, Mining and Agriculture, Chapter 27.10 CCC; Critical Areas Code, Chapter 27.12 CCC; Subdivisions, Title 29 CCC; and Zoning, Title 33 CCC. In accordance with RCW 36.70A.020(15) and .480(1), the Clallam County Shoreline Master Program, as adopted under Title 35, CCC, is considered an element of the Comprehensive Plan. Compliance with GMA development regulations is administered through the County's requirements under Title 20 CCC, Code Compliance. Implementation of the County's Comprehensive Plan and GMA goals is also achieved by a variety of other County plans, regulations, interlocal agreements, and non-regulatory programs including, but not limited to:
- a. Building and Construction Code, Title 21 CCC;
  - b. County Board of Health Regulations, Title 41 CCC;
  - c. Open Space Current Use Tax Reduction Program, Chapter 27.08 CCC;
  - d. Clallam County Comprehensive Parks and Recreation Master Plan (2016-2026);
  - e. 2025 Clallam County Hazard Mitigation Plan (Appendix M);
  - f. 2014 Comprehensive Solid Waste Management Plan;
  - g. Junk Vehicle Public Nuisance Code, Chapter 19.60 CCC;
  - h. WRIA 18 and 20 Watershed Plans;
  - i. Community outreach, projects and other efforts benefitting the health of County Coastal areas through the Clallam County Marine Resources Committee (MRC – Puget Sound) and the North Pacific Coast MRC projects;
  - j. Partner on local salmon and ecosystem recovery planning and restoration efforts through the efforts of the North Olympic Peninsula Lead Entity (NOPL), North Pacific Coast Lead Entity (NPCLE), and Strait Ecosystem Recovery Network (Strait ERN); and
  - k. Habitat restoration projects throughout Clallam County.

#### Growth Allocations and Land Capacity Analysis

13. In accordance with RCW 36.70A.110(2), the County shall designate Urban Growth Areas (UGAs) of adequate size to accommodate future development "based upon the growth management population projection made for the county by the office of financial management." The target growth period to be accommodated is 20 years.
14. RCW 36.70A.070(2) requires the County to accommodate housing for all income segments, including "units for moderate, low, very low, and extremely low-income households. This section of the Act specifically requires the County to include "...an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage growth, as provided by the Department of Commerce."
15. In an effort to assist counties and cities in meeting their obligations for housing allocations, the Department of Commerce developed the Housing for All Planning Tool, or HAPT tool, to assist Counties in allocating housing needs based on anticipated future growth. The HAPT tool is an excel

spreadsheet that includes pre-loaded data for calculating future housing needs based on current housing data within the jurisdiction. Originally, the HAPT model included two methods: HAPT Method A, and HAPT Method B. HAPT Method A allocated housing targets on a pro-rata share of new growth among the jurisdictions. HAPT Method B considered the current status of existing housing stock within each jurisdiction and adjusted the allocation for housing needs accordingly. Both methods failed to consider the limits inherent in the Growth Management Act for allocating low-income housing—typically requiring high-density zoning allowances—in unincorporated UGAs and rural areas.

16. On July 26, 2024, Commerce made available HAPT Method C to all counties in recognition of issues related to the provision of affordable housing in unincorporated urban and rural areas. The HAPT Method C tool exempted rural areas from being required to accommodate very low to extremely low-income housing (0-50% AMI) and required that those needs be accommodated in UGAs and incorporated cities.
17. In considering the input assumptions for the HAPT Method C tool, The Department of Commerce recommended using the medium growth projection model. According to analysis provided by the Department of Community Development, the medium growth projection appeared most in line with growth trends experienced in Clallam County (see Clallam County Demographic Profile, May 2024, Appendix F). Based on these inputs, the HAPT Method C tool projected a County-wide population of 86,700 people by 2045, representing an increase of 7,241 people over the OFM 2025 population estimate (9,545 from 2020 census population figures).
18. Several joint and individual discussions were held between county planning staff and the planning staff from the three incorporated cities between July 12th and August 28, 2024. General consensus was established for supporting the use of the HAPT Method C tool, and for specific growth allocations for the three incorporated cities, the six UGAs within the County, and the remainder non-urban (county) area.
19. On November 26, 2024, the Board of Clallam County Commissioners adopted the growth allocations under the HAPT Method C tool (Resolution 101, 2024), as consented to by the County and three incorporated cities therein. The results of the housing allocation are provided in the following table:

| Clallam County Housing Allocations, HAPT C, 8/28/24 |           |     |         |         |          |           |       |                          |
|---|-----------|-----|---------|---------|----------|-----------|-------|--------------------------|
|   | 0-30% AMI |     |         |         |          |           |       | Emergency Housing (temp) |
|   | Non-PSH   | PSH | >30-50% | >50-80% | >80-100% | >100-120% | >120% |                          |
| City of Forks                                       | 100       | 45  | 92      | 37      | 13       | 10        | 2     | 27                       |
| Forks UGA   | 10        | 5   | 9       | 4       | 1        | 1         | 0     | 3                        |
| City of Port Angeles                                | 664       | 299 | 605     | 241     | 85       | 63        | 13    | 173                      |
| Port Angeles UGA                                    | 100       | 45  | 91      | 37      | 13       | 10        | 2     | 27                       |
| City of Sequim                                      | 623       | 280 | 568     | 227     | 80       | 61        | 11    | 164                      |
| Sequim UGA  | 100       | 45  | 91      | 37      | 13       | 10        | 2     | 27                       |
| Clallam Bay/Seki UGA                                | 10        | 5   | 9       | 4       | 1        | 1         | 0     | 3                        |
| Joyce UGA   | 0         | 0   | 0       | 0       | 0        | 0         | 0     | 0                        |
| Carlsborg UGA                                       | 60        | 27  | 55      | 22      | 8        | 6         | 1     | 16                       |
| Unincorporated Rural                                | 0         | 0   | 0       | 124     | 44       | 34        | 812   | 0                        |

20. Based on the requirements of RCW 36.70A.110(2) and .070(2), the County prepared a Land Capacity Analysis (LCA, Exhibit B) that determined the suitability of existing lands under the existing land use/zoning array to accommodate projected housing, commercial and industrial growth over the 20-year planning horizon, including the needs of housing within extremely low, very low, low and moderate-income households, emergency housing and emergency shelters. Uniform methodologies were applied, including consideration of vacant parcels, developed parcels with additional capacity, maximum units available under existing zoning densities, and consideration of accessory dwelling units. Concessions were made for the presence of critical areas and application of a reasonable market factor for parcels unlikely to experience development over the 20-year planning horizon.

- a. *Residential capacity.* The analysis for residential unit construction further considered densities needed to meet housing demand based on income bracket. The analysis was completed for the six unincorporated urban growth areas and the non-urban (rural, resource) area of the County. The analysis concluded that an expansion of high-density residential zoning (10 units/acre or greater) would be needed to accommodate a projected 24-unit need within the Clallam Bay/Seki UGA, and a projected 147-unit need within the Sequim UGA. Comprehensive Land Use Map and Zoning Map amendments have been proposed for changing the current URH designation in Clallam Bay/Seki to MD (change from 1 dwelling/12,500 SF to 15 dwellings/acre), and approximately 47.1 acres of currently designated Sequim S(R-II) to S(R-III) (Change from 5 dwellings per acre to 10 dwellings per acre).

Analysis of the 47.1 acres within the Sequim UGA demonstrates that, taking into consideration land precluded by existing development, critical areas and a reasonable market factor, a total of 22.0 net acres would be available for development. At a density of 10 units per acre, that would produce a net capacity of 220 potential residential units, satisfying the shortfall of 147 high-density residential units identified in the 2025 LCA (Appendix B). The net capacity of this change will allow for the reasonable attainment of the targeted 147 high-density residential units without significantly increasing densities beyond what is projected over the 20-year planning horizon for the UGA. The LCA and the Clallam County Housing Technical Analysis (Appendix C) both demonstrate that the 10 units-per-acre density threshold is adequate for meeting the County's high-density target needs, including growth needs for low, very low, and extremely low-income households.

Appendix L includes an analysis of the land use and zoning density increase within the Clallam Bay/Seki UGA. Although this change (from 1 dwelling per 12,500 DF to 15 dwellings per acre) could create significant capacity for growth, the analysis clearly details that the expectation for growth within the UGA is very limited—with a 20-year forecast of only 30 total units. Given the population trends of the past two decades demonstrating a slow decline, this projection is optimistic. As demonstrated in Appendices B, C and L, the proposed change will assist the community in meeting its housing targets without risk of over-extending the UGA's urban services and infrastructure in meeting the demands of that growth.

- b. *Emergency housing/emergency shelters.* The adopted HAPT Method C tool included allocations for emergency housing/emergency shelters (Finding 19). The analysis provided in the LCA (Appendix B) demonstrated adequate capacity to accommodate all allocated emergency housing/emergency shelter needs for the 20-year planning horizon except for the unincorporated Sequim UGA. Within the Sequim UGA, a deficit of 27 allocated beds were noted. In evaluating possible alternatives for accommodating this projected need, it was determined that the changes would be substantially disruptive to existing neighborhoods. The County coordinated with the City of Sequim on the matter. According to the City's analysis, substantial capacity existed within the City's commercial core to accommodate the 27-bed allocation applicable to the unincorporated UGA. The Sequim City Council considered this matter during their November 24, 2025, Council Meeting and followed up with a letter of concurrence on December 1, 2025, agreeing to accept the reallocation of the identified 27-bed need within City

limits. The Board of County Commissioners responded on December 9, 2025, adopting Resolution 94, 2025 that officially reallocated the 27-bed emergency housing/emergency shelter need to within city limits.

- c. *Commercial and industrial capacity.* The LCA (Appendix B) included an analysis of existing and potential capacity for existing commercial and industrial-zoned areas to accommodate projected future employment and growth within these categories. The analysis demonstrated that adequate capacity was available under existing land use and zoning designations to accommodate commercial, industrial and related job growth over the 20-year planning horizon. The Findings of the LCA concluded that additional analysis may be needed to evaluate the adequacy of existing development patterns and the ability of available parcels at meeting the County's future economic development needs.
21. *Accessory Dwelling Units (ADUs).* Accessory dwelling units have been allowed in Clallam County since prior to the adoption of the GMA in 1990 as both attached and detached units. In response to changes under the GMA concerning ADU development in UGAs, amendments to Ch. 33.50, CCC, are being proposed that will ensure compliance with the new requirements. These changes will be adopted simultaneous with the Comprehensive Plan Update.
  22. *Adequate Provisions.* RCW 36.70A.0780(2)(d) requires the County to "make adequate [housing] provisions for existing and projected needs of all economic segments of the community..." This includes but is not limited to the following:
    - a. "Incorporating consideration for low, very low, extremely low, and moderate-income households." The housing needs of economic household segments were considered in the analysis of the LCA (Exhibit B), The Housing Element Technical Analysis (Exhibit C), and specifically articulated under CCC 31.02.281(2). This included households with moderate incomes (>80% to 120% of Area Median Income or AMI), Low incomes (>50% to 80% AMI), very low incomes (>30% to 50% AMI), and extremely low incomes (0 to 30% AMI). Specific housing density brackets were assigned to each income category to determine adequacy of existing capacity under current zoning to meet demand over the 20-year planning horizon. Based on this analysis, some changes in zoning density for areas of the unincorporated Sequim UGA and Clallam Bay/Sekiu UGA have been proposed to accommodate future housing needs of all income segments of the population.
    - b. "Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations." Several actions have been taken to comply with this section, including adoption of the 2025-2030 Clallam County Homeless Housing Plan (CCC 31.02.280(2)(g)); suspension of the County's TDR program pending improved economic conditions to assure its success (CCC 31.02.283(3)(i)); Expansion of consideration of middle income housing types, such as duplexes, triplexes, townhomes, as well as special accommodations under emergency housing, emergency shelters and permanent supportive housing (CCC 31.02.281(1)), inclusion of zero lot line standards (CCC 31.02.283(3)(b)), Implementation of siting standards for emergency housing and emergency shelters (CCC 31.02.283(3)(i)), and allowing for the installation of temporary housing, safe parking, and other overnight accommodations on land owned by religious organizations (CCC 31.02.283(3)(m)). Additional standards are being proposed under the Clallam County Zoning Code to implement these and similar policies.

- c. "Consideration of housing locations in relation to employment location." This section is specifically addressed under amended policy CCC 31.02.281(1).
  - d. "Consideration of the role of accessory dwelling units in meeting housing needs." Accessory dwelling units have been allowed in Clallam County since prior to the adoption of the GMA in 1990 as both attached and detached units. The role of ADU's in meeting the County's housing allocation targets were fully analyzed within the LCA (Exhibit B). In response to changes under the GMA concerning ADU development in UGAs, amendments to Ch. 33.50, CCC, are being proposed that will ensure compliance with the new requirements. These changes will be adopted simultaneous with the Comprehensive Plan Update.
23. To inform the GMA Periodic Review/Update, the County updated the *Clallam County Demographic Profile – Population, Housing and Economy, May 2024* (Appendix F). The information was updated according to the latest census data as provided by the Office of Financial Management (OFM). The Demographic Profile addresses both countywide and regional population and housing characteristics and changes. The Report informed the development of the LCA and updates to the data contained in the Comprehensive Plan.

#### Critical Area Regulations

24. Chapter 27.12 CCC of the County Code contains the County's critical area regulations. These regulations were originally adopted in June 1992 and have been amended 17 times by ordinance, with the last amendment adopted in June 2025 (Ordinance 1030).
25. The County's Critical Area Code, Chapter 27.12 CCC, defines and regulates critical areas consistent with the GMA definitions of critical areas under RCW 36.70A.030 that includes wetlands; areas with a critical recharging effect on aquifers used for potable water; fish and wildlife habitat conservation areas; frequently flooded areas; and geologically hazardous areas.
26. Clallam County's critical area regulations considered the state guidelines (WAC 365-190) in the designation and classification of critical areas as required under RCW 36.70A.170.
27. The GMA requires the County to include best available science (BAS) in their critical area designations and regulations (RCW 36.70A.172). As part of the GMA Periodic Review/Update process, the consulting staff prepared the Best Available Science Review, Clallam County Critical Areas Ordinance Update (March 18, 2025), and the Gap Analysis, Clallam County Critical Areas Ordinance Update (June 11, 2025). Both documents inform the County as to the specific changes needed in order establish clear compliance with the current regulatory requirements of the GMA. In accordance with RCW 36.70A.130(7)(a)(ii), the analysis indicates the County has made substantial progress towards updating its protection standards for critical areas and will move to adopt said standards in less than 12 months from adoption of the Comprehensive Plan update.

#### Urban Growth Areas

28. Clallam County has designated six Urban Growth Areas (UGAs)—Carlsborg UGA, Clallam Bay-Sekiu UGA, Forks UGA, Joyce UGA, Port Angeles UGA, and Sequim UGA—that total approximately 21,724 acres (includes incorporated areas), or 1.94% of the County's land base. The largest UGAs are associated with the County's three cities—Forks UGA (~4,944 acres), Port Angeles UGA (~9,220 acres), and Sequim UGA (~5,269 acres). The other three UGAs are associated with the unincorporated communities of Carlsborg (~559 acres), Clallam Bay-Sekiu (~1,397 acres), and Joyce (~335 acres).

29. The Clallam Bay-Seki, Forks, Joyce, Port Angeles and Sequim UGAs were all formally designated in 1995 under the County's adopted GMA comprehensive plan. The unincorporated community of Carlsborg was formally designated as the County's sixth UGA in 2000 because of its urban characteristics including an industrial and commercial core, higher residential densities, and urban services and facilities such as public water systems, fire station, school, transit and post office.
30. During the 2007 GMA Periodic Review/Update (Resolution 77), Clallam County completed a 10-year comprehensive review and analysis of its six UGA's in accordance with RCW 36.70A.130(3). The analysis addressed: UGA characteristics; growth trends; projected 20-year population growth for Clallam County and its cities; permitted densities in the cities and unincorporated UGAs; projected UGA population allocations; and analysis of land availability and housing needs. The analysis was coordinated with the cities and the results compiled in a report titled: *Clallam County's Urban Growth Analysis and 10-Year Review, May 2007* (Appendix A).
31. The 2007 UGA Report considered whether the County's six UGAs had sufficient land and densities to accommodate the urban growth that is projected to occur in the county through Year 2030. The county performed the review considering the state OFM's 2002 population projections (Year 2005 to 2025) for Clallam County, which was supplemented to incorporate the OFM's September 2007 population projections for the County through the Year 2030. The analysis showed the County's population growth trending between the OFM's medium and high projections trending to the high population projection.
32. Based on the 2007 UGA Report, the County determined that no revisions to existing UGAs were required to accommodate the projected 20-year growth and that its six UGAs continued to comply with the GMA. The 2007 UGA Report was incorporated by reference under the 2007 comprehensive plan amendment (Ordinance 829, December 11, 2007).
33. The County's six UGAs were challenged following the completion of the 2007 GMA Periodic Review/Update to the GMHB as being oversized. The WWGMHB could not reach agreement on the challenged size of the County's UGAs; and therefore, the County's existing UGA boundaries maintained their presumption of invalidity (April 23, 2008, WWGMHB Final Decision and Order; Case No. 07-0-0018c).
34. Clallam County has determined that the 2007 UGA Report, as supplemented, remains applicable to demonstrate that County UGA's continue to provide sufficient land and permitted densities to accommodate the urban growth and meet housing needs that is projected to occur in the county through Year 2040. This is based on the following:
35. As referenced earlier, the 2025 LCA (Exhibit B) confirmed that the current UGAs are adequate to accommodate the projected growth over the 20-year planning horizon without need for adjusting the boundaries thereto. With minor adjustments to current zoning, the current UGA configuration is sufficient to accommodate all growth projected to occur.
36. Clallam County and its three cities have experienced population growth that has been accommodated by their respective comprehensive plans without any major revisions to UGA boundaries. Since the 2007 GMA Periodic Review/Update, the County has updated its comprehensive plan and development regulations related to the Sequim, Port Angeles and Carlsborg UGAs as summarized below (see Attachment A for more information on referenced Ordinances):
  - a. Sequim UGA:
    - i. Eliminated the Sequim Residential – I comprehensive plan land use and zoning designation that limited urban residential densities to 2 dwelling units (du) per acre and re-designated these areas to Sequim Residential – II that allows for maximum densities of up to 5 du per acre (Ordinance 835, October 2008).

- ii. Expanded the UGA by approximately 105 acres and created a new Research and Development land use and zoning designation (Ordinance 857, December 2009).
  - iii. Removed approximately 82 acres from the UGA and designated as rural lands (Ordinance 861, December 2009). The area removed was determined to not significantly impact accommodation of residential growth in the Sequim UGA.
- b. Port Angeles UGA:
- i. Amended the comprehensive plan land use and zoning designation of approximately 60 acres from urban residential to industrial (Ordinances 880 and 921).
  - ii. Amended the comprehensive plan land use and zoning designation of approximately 6 acres from urban residential to urban neighborhood commercial (Ordinances 932 and 933).
- c. Carlsborg UGA:
- i. Constructed a sewer system at an approximate cost of 14.5 million dollars to convey Carlsborg UGA wastewater to the City of Sequim for treatment. The County-financed part of the sewer system was approximately 14.5 million dollars and Carlsborg UGA residents and businesses were able to start connecting in July 2017. Related actions included:
    - Entered into an Interlocal Agreement (November 24, 2014), between the County and the City of Sequim for the treatment of Carlsborg UGA wastewater at the Sequim Wastewater Reclamation Facility.
    - Adopted Resolution 18, 2015 noting the intent to adopt the December 2014 “Carlsborg Wastewater Facilities Plan Amendment” as the sewage general plan for the Carlsborg UGA.
    - Adopted the 2014 Carlsborg Wastewater Facilities Plan as the Carlsborg UGA sewage general plan by reference under the Sequim-Dungeness Regional Comprehensive Plan, Chapter 31.03 CCC (Ordinance 920, November 2016)
    - Adopted new County Code Chapter 13.12, Carlsborg Sewer System related to regulation (e.g., connection requirements) and administration of the sewer system within the Carlsborg UGA (Ordinance 925, March 2017).
  - ii. Amended the Comprehensive Plan Land Use and Zoning Map (Ordinance 916, November 2016) affecting over 50% of the UGA as follows:
    - Amended approximately 260-acres of Carlsborg Residential (CR) land use and zoning designations throughout the UGA that allowed for 2 du per acre into three new CR zones that allowed for higher and a variety of residential densities—CR-I (4 to 6 du/ac.), CR-II (4 to 8 du/ac.), and CR-III (4 to 10 du/ac.). (Ordinance 916, November 2016)
    - Eliminated the Carlsborg Village Commercial comprehensive plan land use and zoning designation and re-designated the approximately 26 acres impacted into the adjacent Carlsborg Village Center designation. (Ordinance 916, November 2016)
    - Re-designated approximately 12 acres from Carlsborg Residential (CR) to Carlsborg Commercial (CC). (Ordinance 916, November 2016)
    - Amended two, small isolated areas associated with the Parkwood Residential Community from commercial to the Carlsborg Residential-II (CR-II) designation for the Parkwood development. (Ordinance 916, November 2016)
  - iii. Concurrent and consistent with the land use and zoning map amendments the County also updated the Sequim-Dungeness Regional Comprehensive Plan, Chapter 31.03 CCC, related to the UGA community vision and policies addressing public services and facilities, critical areas, open space, transportation, development standards and land use (Ordinance 920, November 2016).
  - iv. Concurrent and consistent with the land use map and comprehensive plan amendments, the County updated the Clallam County Zoning Code zoning and development standards for the Carlsborg UGA (Ordinances 917, 918, and 919; November 2016).

- v. The County's above actions to plan and provide for a Carlsborg Sewer System; update the Carlsborg UGA comprehensive plan future land use map and related policies, and update of implementing zoning controls for the Carlsborg UGA comply with: GMA planning goals to encourage development in urban areas and ensure adequate public facilities and services to support development (RCW 36.70A.020 (1)(2)); capital facility planning for sewer facilities pursuant to RCW 36.70A.070(3); and requirements that UGA's plan for urban growth in areas that have adequate public facility and service capacities to serve such development.

The proposed amendments to the Comprehensive Land Use Map and Zoning Map as referenced in Finding 20, above, will further ensure compliance with the requirements of RCW 36.70A, and ensure the adequacy of the County's UGAs for accommodating future growth through 2045.

### Comprehensive Plan Elements

- 37. Land Use Element. The County's adopted Official Comprehensive Plan Land Use and Zoning Map and related countywide and regional comprehensive plan policies and implementing zoning regulations designate UGAs, natural resource lands, and rural lands as required under the GMA pursuant to RCW 36.70A.070, .110 and .170 (see also Finding 11). Since the 2007 GMA Periodic Review/Update, the County has updated the Comprehensive Plan Land Use and Zoning Map and related comprehensive plan policies and implementing zoning regulations as summarized in Attachment A.
- 38. Housing Element. The Countywide Comprehensive Plan includes a housing element that addresses housing for all household incomes, including low, very low, extremely low and moderate incomes (CCC 31.02.280 through .283). Consistent with RCW 36.70A.070(2), the County has completed the required analysis of existing and projected housing needs and identifying the number of housing units necessary to manage projected 20-year growth (see Findings 13 through 22).
- 39. Capital Facilities Element. The Countywide Comprehensive Plan capital facilities element addresses County capital facilities that include County Courthouse (administration), parks and recreation, fairgrounds, sanitary sewer (Clallam Bay, Sekiu, and Carlsborg), solid waste management, detention and corrections, county roads, and equipment maintenance facilities (CCC 31.02.310-.320). A Capital Facilities Plan has also been developed as part of this Comprehensive Plan Update, adopted under Appendix I. The countywide and regional Comprehensive Plans contain additional inventory information and policies for public facilities and services. The cities of Forks, Port Angeles and Sequim have developed capital facilities plans for their respective UGAs as well as the Port of Port Angeles for its Port properties.

The County has adopted a capital facilities plan specific to the Carlsborg UGA. Other supporting County capital facility planning efforts include the six-year Transportation Improvement Program (see Finding 40), parks and recreation master plan, fairground master plan, solid waste management plan, and annual 10-year capital improvement plan. These provisions guide County investment in developing public facilities and services and maintenance of existing facilities and services.

The County reviews and updates its capital facility needs as needed. The county finds that the comprehensive plan provisions related to capital facilities and supporting planning efforts together with the annual reviews continue to comply with GMA requirements based on local needs. Since the 2007 GMA Periodic Review/Update, significant updates include:

- a. Adoption of the "Carlsborg Wastewater Facilities Plan Amendment" as the sewage general plan for the Carlsborg UGA (2016).
- b. Annual update of the Six-Year Transportation Improvement Program to address road and multi-modal transportation projects (e.g., trails)—see Finding 40.
- c. County Park & Recreation Master Plan (2016-2026).

- d. County Comprehensive Solid Waste Management Plan Update 2021
  - e. Annual update of a 10-Year Capital Facilities Plan to address capital projects and actions identified in the comprehensive plan, various county capital facility plans, and other plans concurrent with adoption of the county's annual budget.
  - f. Clallam County 5 Year Capital Plan, 2024-2028.
  - g. Adoption of the Clallam Bay/Seki General Sewer/Wastewater Facilities Plan (2018 Plan, amended 2025).
40. Utilities Element. The County-wide Comprehensive Plan provides a Utilities Element that identifies the general distribution, location, and extent of the county's public utilities, while analyzing the issues and goals for the same (CCC 31.02.300). Public utility policies and related provisions are also found in the four Regional Comprehensive Plans. Specific utility plans (e.g., electric, water, sewer) are also available from public utility service providers such as the Clallam County PUD #1, the County's three cities, and other larger public water utilities. Clallam County owns and operates a public sewer system utility serving the unincorporated communities of Clallam Bay and Sekiu. Since the 2007 GMA Periodic Review/Update, a major utility improvement by the County in cooperation with the City of Sequim was the construction of a new public sewer collection system serving the Carlsborg UGA that conveys wastewater to Sequim for treatment. Similarly, improvements to the Clallam Bay/Seki Sewer/Wastewater Facility system was completed in 2024.
41. Rural Element. The County's comprehensive plan land use and zoning map related countywide and regional plan policies and implementing zoning designate approximately 100,806 acres, 9% of County, as rural lands. Consistent with RCW 36.70A.070(5), these rural lands provide for a variety of rural densities with allowed maximum residential densities ranging between 1 du per 5 acres to 1 du per 20 acres. In addition, many County rural zones provide for innovative land use management techniques supported by RCW 36.70A.070(5)(b) and RCW 36.70A.090 such as flexible minimum lot size (where consistent with maximum density) to support retention of larger rural lots and density incentives if the property when subdivided meets adopted rural character conservation/cluster design policies and design standards.

County rural lands include formally designated (CCC 31.02.263) limited areas of more intensive rural development (LAMIRDs) consistent with RCW 36.70A.070(5)(d). These LAMIRDs include over 40 areas scattered throughout the County including approximately 6,224 acres (0.56% of County) of Residential LAMIRDs and approximately 2,364 acres (0.21% of County) of Commercial and Mixed Use LAMIRDs. Residential LAMIRDs include seven land use and zoning designations that allow for densities ranging from 1 du per 12,500 sf to 1 du per 2.4 acres, with approximately 70% of Residential LAMIRDs allowing a maximum residential density of 1 du per acre. County Commercial and Mixed Use LAMIRDs are typically associated with isolated or cross-road commercial nodes along state highways, existing small communities, rural airports, and other locations.

The GMA provides that "because circumstances vary from county to county, in establishing patterns of rural densities and uses, a county may consider local circumstances, but shall develop a written record explaining how the rural element harmonizes the planning goals in RCW 36.70A.020 and meets the requirements of this chapter (RCW 36.70A.070(5))." Clallam County previously developed a written record that shows how local circumstances guided the development of the rural element of the comprehensive plan consistent with the GMA as noted in the following two reports entitled: *Clallam County Rural Lands Report, December 2006*, as supplemented (Appendix D) and the *Clallam County LAMIRD Report, September 2006*, as supplemented (Appendix E).

Upon review of the County's rural areas through the LCA (Exhibit B), it was determined that no additional changes were needed to the Land Use Designation and Zoning Map for this portion of the County under this Comprehensive Plan Update.

42. **Transportation Element.** The countywide comprehensive plan inventories, describes, and analyzes county transportation, including multimodal, needs and resources (CCC 31.02.410-444). The transportation element inventories roads; ports, terminals, and moorage; ferries; airport resources; recreational, pedestrian, and bicycle trails; and public transit resources and includes goals and policies for multi-modal transportation facilities (CCC 31.02.415). The Plan analyzes level of service (LOS) standards, which are used to measure whether transportation facilities are performing at acceptable levels and to identify capacity deficiencies (CCC 31.02.410-432), including adopting a policy that highway level of service (LOS) be consistent with the Peninsula Regional Transportation Planning Organization (PRTPO) regional plan. The county's four regional comprehensive plans, including neighborhood plans within the Port Angeles and Sequim planning regions, provide additional inventory, goals, and policies for transportation. The County also maintains an up-to-date inventory of County roads which includes functional class and road characteristics (e.g., width), and a pavement management system that involves videotaping of County roads.
43. **Six Year Transportation Improvement Plan.** Consistent with RCW 36.70A.070(6)(iv), the County annually reviews and updates a six-year Transportation Improvement Plan (TIP). Consistent with the comprehensive plan and 6-year TIP, a number of major transportation improvement projects have been implemented since the 2018 GMA Periodic Review/Update to improve LOS, road/bridge safety, and multi-modal transportation including, but not limited to:
- a. Major collector/arterial road improvement projects:
    - i. Sequim-Dungeness Way and Woodcock Road Intersection Improvement Project. Constructed a roundabout.
    - ii. Dry Creek Road Improvement Project (~ 0.7 miles). Reconstruction, widening, and resurfacing. Project also added a left turn lane at US 101 intersection and moved intersection with Edgewood Drive to west to accommodate future left turn land from Edgewood Drive onto Dry Creek Road.
    - iii. Laird Road Improvement Project (~ 0.5 miles). Resurface, restore, and shoulder widening.
    - iv. Carlsborg Road Improvement Project. Resurface, restore, and shoulder widening (Mile Post 1.01 to 1.76) between Olympic Discovery Trail crossing and Old Olympic Highway.
    - v. South Airport Road Improvement Project (~ 0.7 miles). Resurfacing of key connecting road between US 101 to William Fairchild International Airport.
    - vi. Old Olympic Highway Improvement Project (~ 0.85 miles). Resurfacing, widening, and stormwater improvements (Milepost 2.75 to 3.6).
  - b. Major local access road completed improvement projects:
    - i. Town Road Relocation and Improvement project. Relocated North Segment of Towne Road to top of relocated levee, including construction of separated (by curb) bike and pedestrian path along the road.
  - c. Major culvert/fish passage improvement projects:
    - i. Hoko-Ozette Road culvert replacement. Replaced structurally failed culvert and fish passage barrier at milepost 8.8 – Johnson Creek crossing.
    - ii. Kugal Creek culvert replacement on Cooper Ranch Road. Fish passage improvement project.
    - iii. Bear Creek Road culvert replacement. Fish passage improvement project.
    - iv. Crescent Beach Road culvert replacement. Replaced storm damaged culvert that failed.
    - v. Wilson Creek culvert replacements. Replaced culverts on Wilson Creek for fish passage improvement along Wisen Creek and Swede Roads.
  - d. Major bridge improvement projects:
    - i. Old Olympic Highway, McDonald Creek Bridge replacement.

- ii. Woodcock Road, Dungeness River Ward Bridge scour repair project.
    - e. Olympic Discovery Trail (ODT) major improvement projects:
      - i. ODT-Freshwater Bay Road to Thompson Road, via Onella/historic railroad grade alignment (~ 1.75 miles).
      - ii. ODT-Gossett Road to Waterline Road connector (~ 1.6 miles).
      - iii. ODT-Spruce Railroad Trail Final Phase, North Shore Lake Crescent. Completed the remaining gap of the ODT around the north shore of Lk. Crescent to provide a safe, 10-mile long, ADA accessible, trail alternative for non-motorized users that completely bypasses the busy US 101 route around Lake Crescent. Key final phase improvements included: (a) restore Daley-Rankin Tunnel; (b) restore and pave approximately four miles of shared use trail.
      - iv. ODT-Diamond Point to Gardiner Road connector. Constructed the last ~600 feet trail segment from Diamond Point Rd. to East County Line and extending to Old Gardner Road in Jefferson County.
44. Economic Development Element. Under the GMA, the economic development element is mandated where funds sufficient to cover applicable local government costs are appropriated and distributed by the state at least two years before the jurisdiction must complete the periodic review/update (RCW 36.70A.070(9)). The Legislature has not specifically allocated funds to cover County costs for the County's economic development element. Nonetheless, the County's comprehensive plan contains an economic development element under CCC 31.02.610 and .620 of the Countywide Comprehensive Plan. Additional economic development element provisions are found within the county's four regional comprehensive plans. Data has been updated to reflect current trends and additional policies have been included under CCC 31.02.620 to reflect current opportunities and challenges.
45. Parks and Recreation Element. Under the GMA, the parks and recreation element is mandated where funds sufficient to cover applicable local government costs are appropriated and distributed by the state at least two years before the jurisdiction must complete the periodic review/update (RCW 36.70A.070(10)). The Legislature has not specifically allocated funds to cover County costs for the County's park and recreation element. Nonetheless, the County has adopted and a 10-year Clallam County Comprehensive Park and Recreation Master Plan (2016-2026) and is currently working on an update to the Plan. In 2009, the County amended the comprehensive plan land use and zoning map creating a County Parks and Recreation (PR) designation and related zoning standards (Ordinance 860), and in 2015 the County expanded the PR designation associated with new 40-acre regional park (Rainshadow Disc Golf Park) on the Miller Peninsula. No additional changes are proposed under this Comprehensive Plan Update.
46. Natural Resource Lands. Clallam County has designated natural resource lands totaling approximately 641,000 acres, or 57.6% of the County's land base, to assure the conservation of forest, agricultural, and mineral resource lands of long-term significance consistent with RCW 36.70A.060 and .170.
- a. Commercial Forest Lands. Nearly 641,000 acres (~57 % of County) is designated as commercial forest lands. Forestry is also an allowed and preferred use in County designated rural lands. At the time of the county's initial natural resource lands designation in the early-1990's under the GMA, the county found that conversions from forest use to residential and other uses were negatively affecting the amount of land available for productive commercial forest use (CCC 31.02.130). The county went through an extensive study and evaluation that resulted in the enactment of policies for designation and protection of commercial forestlands (CCC 31.02.140). To implement its policies for designation and protection of commercial forest lands, the county enacted regulatory changes. For instance, most designated commercial forest lands were downzoned from the pre-existing zoning (which allowed densities ranging from one unit per 5

acres to one unit per 20 acres,) to new zoning that restricts residential development to one unit per 80 acres for most designated commercial forest lands.

In 2016, there were only an estimated 105 homes scattered throughout the County's over 630,000 acres of designated commercial forest lands, and only another 56 homes in the over 4,000 acres of commercial forest-mixed residential designations. Since the 2007 GMA Periodic Review/Update, there has been no loss of designated commercial forest lands, and approximately 160-acres of rural lands were re-designated to commercial forest lands. The commercial forest industry continues to face challenges of economic conditions and environmental regulations, but the pressures previously presented by conversions to conflicting uses have been effectively curtailed.

- b. **Agricultural Lands.** Approximately 6,202 acres (~0.6 % of County) is designated as agricultural retention lands. Agriculture is also an allowed and preferred use in County designated rural lands. The designation and regulation of agricultural lands of long-term commercial significance in Clallam County have been thoroughly vetted associated with two prior WWGMHB cases. In the 1990's, regulations applicable to the designated agricultural lands were challenged and found to be noncompliant. The County undertook a thorough review and evaluation of the unique local circumstances applicable to these lands and designed regulations to appropriately conserve and protect the designated agricultural lands, consistent with local circumstances and the goals and requirements of the GMA (Ordinance 627, October 1997). Upon review of the county's compliance, the WWGMHB not only found compliance and lifted invalidity, but congratulated the county for "a job well done" (WWGMHB 96-2-0031, Rescission of Invalidity and Finding of Compliance, 11 (Dec. 11, 1997)).
- c. **Mineral Resource Lands.** At the adoption of the last Comprehensive Plan Update in August 2018, the County had identified over 634,00 acres of mineral resource lands, which primarily coincided with the County's designation of Commercial Forest Resource Lands (CF) as well as existing mining locations. A challenge of the Comprehensive Plan update was filed with the WWGMHB, taking issue with the lack of full compliance with the mineral lands' designation criteria of RCW 36.70A.131, citing that the County had over-designated all Commercial Forest Resource Lands as Mineral Resource Lands. On November 10, 2020, the Board of County Commissioners adopted Ordinances 967, 968 and 969 establishing a formalized method for classification of mineral resource lands that uses a scoring method and awards points for the presence of key resource features. 39 existing mining sites were automatically included in the Mineral Resource Land Overlay District (MRL0D), along with ten inactive sites based upon the designation criteria. Upon adoption of the ordinances, the petition before the WWGMHB was withdrawn. With no additional mineral resource inventory mapping or other information affecting the original data considered, no further changes to the mineral resource lands policies or the regulations included under Chapters 27.10 or 33.62 are warranted. This review demonstrates that the County is presently compliant with the mineral resource lands designation criteria of RCW 36.70A.131 and .170.
- d. **Natural Resource Land Notices.** Clallam County has adopted development regulations consistent with the GMA requirements under RCW 36.70A.060(1) for notices and disclosure for development within 600 feet of natural resource land designations pursuant to its Right to Practice Forestry, Mining, and Agriculture code, Chapter 27.10 CCC, and Subdivision Code (Chapter 29.20.300(26)). To address recent changes under RCW 36.70A.060(1)(b), new notice requirements will apply to all new building and development permits occurring within 500 feet of designated agriculture, commercial forest or mineral resource areas designating those uses as priority uses, and limiting the County's consideration of possible nuisances if said operations are following best management practices (proposed CCC 33.40.110).

47. Climate and Resiliency Element. On July 23, 2023, the State Legislature adopted as law House Bill 1181, which amended, among other sections, RCW 36.70A.020(14) and .070(9), requiring the County to adopt a climate change and resiliency element to its Comprehensive Plan and development regulations. In association with a grant provided by the Department of Commerce, the County hired Cascadia Consulting to assist in the development of the newly required element. Following an extensive process involving an appointed focus group, public outreach meetings and coordination with County staff, the consulting team provided draft recommendations for a climate and resiliency element that has been incorporated under CCC 31.02.810 and .820 of the draft Comprehensive Plan Update. Key portions of the recommended element have also been integrated into other elements of the Plan and regional subarea plans.
  - a. To address specific requirements of RCW 36.70A.070(1), CCC 31.02.820(8)(f) and .820(13)(c) formally adopt the 2025 Clallam County Hazard Mitigation Plan and Chapter 6 of the 2021 Washington State Wildland-Urban Interface Code, respectively. These plans and regulations set forth standards and procedures for addressing public safety concerning the projected proliferation of wildfire and associated risks within Clallam County.
48. Clallam County and its three cities are collaborating on updates to the Countywide Planning Policies adopted previously under RCW 36.70A.210. The City of Port Angeles adopted its Comprehensive Plan Update on December 26, 2025. It is anticipated that the remaining updates will be completed and adopted by the county and its cities in 2026.
49. The Clallam County Planning Commission held a duly advertised public hearing on the proposed amendments to the Comprehensive Plan and development regulations on November 5, 2025. The public hearing was continued on five separate occasions, concluding on February 4, 2026, following which, the Planning Commission forwarded their recommendation to the Board of County Commissioners citing 49 findings in support of their recommendation.
50. Board of Clallam County Commissioners held a public hearing on March 10, 2026, and continued the hearing to March 24, 2026. Following the close of the public hearing, the Board took unanimous action to approve the changes under the Comprehensive Plan Update based on Findings 1 through 50 within this Resolution.

NOW, THEREFORE, BE IT RESOLVED by the Board of Clallam County Commissioners, in consideration of the above findings of fact:

1. The County has completed its periodic review and update as required under RCW 36.70A.130.
2. The County's comprehensive Plan and implementing development regulations as amended (see Attachment A) from the previous 2018 GMA Periodic Review/Update meets the goals and requirements of the GMA (RCW 36.70A).
3. The County's periodic review considered many prior County actions, particularly since the last GMA Periodic Review/Update completed in August 2018 (Resolution 82) and August 2007 (Resolution 77), to review and revise its Comprehensive Plan and development regulations, which actions reflect changing local needs and GMA compliance measures. By recognizing prior enactments for which notice of action has already been published, this Resolution in no way incorporates or re-enacts such measures, and they remain outside of the notice of action and appeal period applicable to this Resolution. This Resolution collectively summarizes the compliance status of the County's comprehensive plan and development regulations in recognition of regular annual and periodic amendments and the County's update activities in response to the update provisions of RCW 36.70A.130.

4. The County's periodic review focused on determining that its comprehensive plan and development regulations continue to comply with the GMA; and therefore, this review was not intended to re-evaluate or amend the current overall direction of the comprehensive plan (e.g., vision, policies) and development regulations (e.g., zoning) nor to identify changes to clarify or streamline policies or regulations.
  
5. The County will continue to review and update its comprehensive plan and implementing development regulations to be responsive to local needs and growth issues consistent with the GMA. The County will initiate in 2026 and complete in 2027 a countywide public process to re-evaluate current comprehensive plan vision and related policies and update the plan, as needed.

PASSED AND ADOPTED this \_\_\_\_\_ day of \_\_\_\_\_ 2026

BOARD OF CLALLAM COUNTY COMMISSIONERS

\_\_\_\_\_  
Mark Ozias

ATTEST:

\_\_\_\_\_  
Randy Johnson

\_\_\_\_\_  
Loni Gores, Clerk of the Board

\_\_\_\_\_  
Mike French, Chair



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**Memorandum**

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**Date:** February 13, 2026  
**To:** Clallam County Planning Commission  
**From:** Bruce Emery, Director of Community Development  
**Re:** Supplemental Information regarding Commerce Checklist Responses

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Hello, Planning Commission members and please pardon the late intrusion. Attached is a supplemental table including responses to the six remaining Commerce Checklist Items. These items correspond to numbering scheme included in Table 4 and reference the page number and item letter in the Commerce Checklist—both of which were included in your February 4<sup>th</sup> packet.

The only substantive response is included in Item #6, addressing requirements of RCW 36.70A.070(2)(g) and (h). These changes are intended to meet the statutes requirement for anti-displacement policies (avoid outpricing existing residents when a community grows and develops). Several other amendments have already been suggested that address the requirements under Subsection (h) and are identified in the response.

Regarding the remaining items (#10, 11, 14, 15 and 26), the provisions of the Act cited in the Commerce Checklist do not apply to Clallam County, primarily because we are under 130,000 population (exempt from specific transportation requirements under RCW 36.70A.070), or, as noted, the UGA boundaries are not being modified. This information completes the Checklist and as well as the cope of the record for the Comprehensive Plan update.

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

Sincerely,

A handwritten signature in blue ink that reads "Bruce W. Emery".

Bruce Emery, Director  
Clallam County DCD

| Commerce Gap Identification   | County Response  |
|---|--|
| <p>6) 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.<br/> <a href="#">RCW 36.70A.070(2)(g)</a> new in 2021<br/>           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. <a href="#">RCW 36.70A.070(2)(h)</a> new in 2021</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><b>Regarding Item (g), include the following under new section CCC 31.02.280(3)(f):</b> <a href="#">“The Department of Commerce provided a Draft Displacement Risk Map and supporting data in 2023 to assist jurisdictions in determining areas potentially at risk of displacement with increased community development (see: (URL)). The Map identifies two key areas within Clallam County that may meet the high-risk threshold for displacement potential. These areas include 1) core areas of Port Angeles and the unincorporated UGA from Tumwater canyon to the west, Lauridson Blvd/UGA boundary to the south, and Ennis Creek to the east; and 2) Forks and vicinity including highway 110 and the Calawah River to the north and west, Bogachiel River and Mill Creek to the south, and Olympic National Forest to the east. Standards, techniques and resources should be developed that address the risk of housing displacement as these and other areas within Clallam County develop.”</a></p> <p><b>Regarding Item (h): see amended sections 31.02.280(3)(c), 31.02.281(1) &amp; (2), 31.02.283(3)(b) &amp; (k), 31.02.320(3), and .820(3), (4), &amp; (9).</b></p> |
| <p>10) 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. <a href="#">RCW 36.70A.130</a> amended in 2022 (see <a href="#">SB 5593</a>)</p>  | <p>31.02.420(6) discusses financing, but it lacks the identification of transportation facilities, and public facilities and services needed to serve the UGA.</p> <p><b>RCW 36.70A.130(3)(v) does not apply. There are no adjustments being made to the current UGA boundaries which would trigger this requirement.</b></p>  |
| <p>11) P. 21, e.) A forecast of multimodal transportation for a minimum of 10 years including land use assumptions used in estimating travel. <a href="#">RCW 36.70A.070(6)(a)(i)</a>, <a href="#">RCW 36.70A.070(6)(a)(iii)(E)</a> amended in 2023, <a href="#">WAC 365-196-430(2)(f)</a></p>  | <p><b>Clallam County is exempt from this requirement pursuant to <a href="#">RCW 36.70A.095(2)</a> and <a href="#">WAC 365-196-443, Table 1.</a></b></p>   |

|   |   |
|---|---|
| <p>14) 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. <a href="#">RCW 36.70A.070(6)(a)(vii)</a> amended in 2023, <a href="#">WAC 365-196-430(2)(j)</a></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><b>Clallam County is exempt from this requirement pursuant to RCW 36.70A.095(2) and WAC 365-196-443, Table 1.</b></p> |
| <p>15) P. 22, j.) An analysis of future funding capability to judge needs against probable funding resources. <a href="#">RCW 36.70A.070(6)(a)(iv)(A)</a>, <a href="#">WAC 365.196-430(2)(k)(iv)</a></p>  | <p><b>Clallam County is exempt from this requirement pursuant to RCW 36.70A.095(2) and WAC 365-196-443, Table 1.</b></p>  |
| <p>26) P. 52, d.) Traffic demand management (TDM) requirements are consistent with the comprehensive plan. <a href="#">RCW 36.70A.070(6)(a)(vi)</a> 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. <a href="#">WAC 365-196-840(4)</a> recommends adopting methodologies that analyze the transportation system from a comprehensive, multimodal perspective.</p> | <p><b>Clallam County is exempt from this requirement pursuant to RCW 36.70A.095(2) and WAC 365-196-443, Table 1.</b></p>  |