

AGENDA

Clallam County Planning Commission

Planning Commission Meeting of Wednesday, March 4, 2026, 6:00 p.m.

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

- A. CALL TO ORDER**
- B. PLEDGE OF ALLEGIANCE**
- C. ROLL CALL**
- D. WELCOME**
- E. APPROVAL OF MINUTES:** February 18, 2026
- F. ANNOUNCEMENTS:**
- G. PUBLIC COMMENT on AGENDA ITEMS – Please Limit Comments to Three Minutes**
- H. UNFINISHED BUSINESS:** None
- I. PUBLIC HEARING/COMMISSION ACTION:** Continued Public Hearing of the Comprehensive Plan Update
- J. WORK SESSION ITEMS:** Continued work on the changes to the Comprehensive Plan Update
- K. PUBLIC COMMENT – Please Limit Comments to Three Minutes**
- L. DISCUSSION OF PUBLIC COMMENTS**
- M. GOOD OF THE ORDER**
- N. ADJOURNMENT**

Members:

Chair, Steve Gale & Vice-Chair, Katina Hester
Warren Billups; Thomas Butler;
Jane Hielman; Ron Long; Kenneth Reandeau; Janice Wilson; Vacancy
Department of Community Development Staff:
Bruce Emery, DCD Director; Tim Havel, Deputy Director

MINUTES

Clallam County Planning Commission

Meeting of February 18, 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, Warren Billups, Janice Wilson, and Jane Hielman. Bruce Emery, Director and Donella Clark, Principal Planner, represented staff from the Department of Community Development.
- D. **WELCOME:** Chair Gale welcomed all in attendance
- E. **APPROVAL OF MINUTES:** Commissioner Long motioned to approve the minutes and Commissioner Hester seconded. Motion passed with one abstention.
- F. **ANNOUNCEMENTS:** None.
- G. **PUBLIC COMMENT PERIOD:** John Worthington commented that SERN and ODC are trying to move growth to the UGA. The RV Ordinance is dancing around rental of RVs. Also commented on the reservoir project and the lack of habitat it creates for kings.

Heather Cantua of Bear Creek Road commented on the Conditional Use Permit on Grouse Glen Road and the realization of the importance of the Comprehensive Plan in supporting those decisions. The Western Regional Plan has not had any substantial updates since the 1990's. Changes regarding water resources and septic should be added. Entire section needs an overhaul.

- H. **UNFINISHED BUSINESS:** None.
- I. **PUBLIC HEARING ITEM:** Commission opened the public hearing. John Worthington commented about the reservoir project versus habitat. He also commented on the conversion of open space from farms.

WORK SESSION ITEMS: Director Emery shared an email from Judy Larson regarding comments on the Comprehensive Plan. SEPA has been issued and the Commerce Checklist has been complete. Materials have been sent to Commerce for their review. Commission Hester noted that the Commission has been working to meet the GMA compliance that they need to step back and look at the Comprehensive Plan overall. Does not feel the Commission has meet the needs of our districts. Director Emery noted there has been so many changes there has not been as much time for grassroots planning.

The Commission continued to work through Table 3 – Public Testimony. Director Emery will make a recommendation on wording regarding the archeological preservation sites. Will bring back agricultural ag uses to discuss next time. Reviewed the Statutory Requirements concerning the UGA swap as proposed. Commission also discussed the Draft Resolution to the Commissioners. Commissioner Billups wished there were more aspirational goals included in the Comprehensive Plan. Maybe there needs to be an effort to engage the public just on the goals. Commissioner Long commented that a lot of the comments received have been policy from agencies. Commissioned agreed to discuss the amended Table 3 and Table 4 at the next meeting.

Director Emery recommended continuing the hearing until March 4th. Commissioner Hester moved to continue the hearing and Commissioner Long seconded.

- J. PUBLIC COMMENT PERIOD: John Worthington wrote an email to Director Emery regarding comments and questions. Commented on the flooding at 3 Crabs and the engineered flooding. Heather Cantua appreciated the comments regarding the vision and goals of the Comprehensive Plan. The neighbors have started a dialog regarding how we have growth that is sustainable. Inaccuracies exist in the Comprehensive Plan regarding the Hungry Bear Café which has been closed for five years and mention of a golf course that is likely not supported by the community anymore. Asked how best to get changes to the Comprehensive Plan.
- L. DISCUSSION OF PUBLIC COMMENTS: Commissioner Hester stated the best way to provide comment is in writing. Director Emery concurred that written comments are appreciated.
- M. GOOD OF THE ORDER: Commission would like to see the entire Comprehensive Plan as an entire document. Staff will send a link.
- N. ADJOURNMENT: The meeting adjourned at __8:20 p.m.____

Emery, Bruce

From: larjdyng@olyphen.com
Sent: Monday, February 16, 2026 12:16 PM
To: Emery, Bruce; larjdyng@olyphen.com
Subject: Fwd: CC Planning Commission Public Hearing 2-4-26 RE: CC-CP Update -Public Comment for the Record

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

Dear Director Bruce

1) Please disregard my 2-16-26 message/inquiry. My computer only recently (1 hour ago) allowed me to get back online, so I have discovered why I could not find my 2-4-26 input for the Planning Commission's 2-4 session. (I used an incorrect email address, but my "postmaster" did not show the error.)

2) Please provide my following Public Comment for the Planning Commissioners' 2-18-26 session.

Thank you,
Judy Larson

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

Subject: CC Planning Commission Public Hearing 2-4-26 RE: CC-CP Update -Public Comment for the Record
Date: 2026-02-04 16:31
From: larjdyng@olyphen.com
To: Bruce.Emery@clallamcowa.gov, larjdyng@olyphen.com

Attention: CC Planning Commissioners

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

I have continued to try to update my knowledge about the CP-Update efforts of our County AND Sequim by using online resources with the help of a good friend's loaned laptop. Family/health circumstances continue to reduce my ability to attend meetings, but here are some additional inputs for the record and your consideration.

1) AGAIN for the record, I note how difficult it is to try to read the online materials (i.e. confusing highlighting, "line-outs," red revisions.) and how this impacts participation by resident stakeholders without online access. (I do believe 31.01.200 <"Citizen participation and coordination"> supports having printed materials in each of our Library branches -as done in past.)

While I still have not found the record for my participation at the County's Sequim July 2025 Public Meeting, I do note that besides my online reviewing of: 31.01 (10pp), 31.02 (283pp), 31.03 (116pp), Appendix K (105pp), Land Capacity Analysis 11-4-25 (30pp), Demographic Profile 2024 (24pp), I have found the online materials pertinent to your 1-21-26 meeting and the WA Department of Commerce comments. Additionally, I have looked at current Sequim Zoning and UGA maps and read online information about whether the County or Sequim determines zoning for the UGA.

I noted on 1-21-26 how as a rural land owner with a shallow exempt well, I found and cited specific CP-Update sections that I found deficient in recognizing and protecting "...the availability of water/exempt wells, wildlife corridors/habitats - especially with respect to the new GMA Climate Change & Resiliency element requirements. Resource/Infrastructure analyses should depict where/how our exempt wells and OSS locations provide vital roles for supporting Clallam's population.

I note how the WA Dep't of Commerce did comment on Update sections still needing additional attention. They did not note the Sequim-Valley component, which as a Sequim area resident I note needs serious revisions/updating.

My newest specific input for your consideration tonight is the matter of the County's Sequim UGA exhibit B map, showing several parcels in the Sequim UGA at the intersection of Spruce Court and Priest Road as being "promoted" for much higher residential density/land use than closest City or County areas. While the County's consultants have conducted a Land Capacity Analysis to arrive at this proposed map revision, it is the City's UGA and it is supposed to be "the City drives the planning process..." and the County formally adopts this plan. The timelines for the County and City CP-Updates currently do not appear to be compatible, so this appears to be in conflict with GMA requirements for consistency and per CCPP.

Again, I thank you for your attention and for your ongoing (I hope) investment of your time to address our County's needs and public concerns.

Respectfully,
Judy Larson



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

Memorandum

Date: February 24, 2026
To: Clallam County Planning Commission
From: Bruce Emery, Director of Community Development
Re: Planning Commission CPU Continued Public Hearing, 03/04/2026

Hello, Planning Commission Members. The public hearing for the CPU will continue on March 4, 2026.

Packet Items. Your packet includes the following:

- Revised Table 3 with updates from 2/4/26 and 2/18/26 meetings.
- SEPA Checklist and Threshold Determination of Non-Significance (DNS), issued on February 11, 2026 (Comment period ends 3/26/26).

I know, I wasn't supposed to provide new versions of the table to avoid confusion. However, with the Commission having completed their review of Table 3 during the 2/18/26 meeting, and the need to provide additional response to testimony received, I needed to communicate the draft changes I made in response to the discussion.

My recommendation for the work session on March 4th is to review the following:

- Review all staff edits to Table 3 (includes T3 excerpt from 2/18 packet and revised T3, attached),
- Review Table 4 with Supplemental Memo (2/13/26) and Commerce Checklist,
- Discussion on visioning and items raised in oral testimony (2/18/26).

Please bring Table 4 and the Commerce Checklist as provided in your 2/18/26 packet, including the supplement I provided on 2/13/26.

Visioning and Oral Testimony. During the February 18th public hearing, substantive testimony and Commission discussion was had regarding the need for policy changes addressing the visioning contained within certain portions of the Comprehensive Plan. These include the following:

Policies concerning the Western Regional Comprehensive Plan, Chapter 31.06, CCC:

- Testimony suggested that Water resources and sewage disposal in rural areas were lacking. 31.06.070(5) and (6) address water and sewer systems, including

onsite septic systems in the region. Water resource issues could benefit from new policy under 31.06.080(2) (see below).

- Testimony suggested that water availability should be demonstrated for all CUPs, subdivisions, and major development proposals including hydric continuity and impacts to vicinity wells and aquatic habitats. Suggest the following under 31.06.080(2):

(e) Policy 8. The rural portions of the region are largely dependent on private, individual wells to serve potable water needs of the community. Because of area geology, water availability can be difficult to establish. Demonstrating the suitability of adequate water supply that does not adversely impact existing wells, water systems or river and stream environments, should be required as a condition for all major new development.

- Testimony suggested that project approvals need to fit within the local ecosystem, resource limitations, and reflect the unique natural resources of the community. In response, 31.06.010(3) could be amended as follows:

(3) The rural character of the RPC planning areas should be encouraged. This should include an evaluation of major new development to ensure its characteristics and scope are compatible with the rural community character, resources, and natural setting of the project vicinity.

- Testimony requested policies that require use of local materials, labor, and other requirements that address local community needs. New policy 31.06.100(13) could be considered as follows:

(13) The economic vitality of the Western Region is dependent, in large part, on the continued viability of the area's natural resource-based industries. The promotion of use of locally sourced construction materials and labor should be encouraged and supported.

- Testimony requested removal of reference to "Bear Creek Resort" and "golf courses." These specific references are found under CCC 31.06.070(7). Proposed amendments could include:

(7) Parks and Recreation. Recreational opportunities are abundant in the West End Planning Region. The Olympic National Park forms the eastern boundary of the region and includes a strip along the Pacific Coast to the west. The Sol Duc, Calawah and Bogachiel Rivers all have boat launch facilities located throughout these river systems. Resort facilities like the ones located at ~~Bear Creek and Three Rivers~~ provide sports fishermen and recreationalists with ample opportunities to enjoy the outdoors in a resort type atmosphere. However, it is believed that these will be insufficient to meet the growing demand for such facilities as the tourist oriented sector of the economy continues to grow. Ball parks and other sports facilities are located at Beaver and within the incorporated City of Forks. Tillicum Park within the City of Forks provides fifteen (15) acres of ball fields, tennis courts and other recreational facilities serving the local community. ~~There are no golf courses in the region. Resort facilities and golf courses are recognized as the only significant deficiencies over the twenty (20) year planning period.~~

31.02: Address agricultural accessory uses as follows:

- Concerning agricultural accessory uses, was there any text stricken that may be of value? The last paragraph under 31.02.115(6), could be retained in addition to the new language under 31.02.115(3)(c). This language reads as follows and would logically fit under 31.02.115(1), as the last paragraph in that section:

The need to redefine and broaden what we mean by the term “farm,” and in so doing develop policies and programs that support this new vision of agriculture, exists in many places, not just in Clallam County. The Washington State Legislature passed legislation in 2004, which was amended in 2006, that essentially redefined what agriculture is; including references to “agriculturally related experiences, or the production, marketing, and distribution of value-added agricultural products, including support services that facilitate these activities” (RCW [36.70A.177](#)). The State of Washington now recognizes that the needs of many farmers are much broader than in the past, and that small, innovative, entrepreneurial farmers require the ability to sell everything from high-dollar, value-added products to farm experiences on agritourism-oriented farms.

- Consider additional accessory uses, including Harvest-Host and Wineries, Cideries, Breweries and distilleries. Concerning Harvest-Host, the reservation of one RV use site on a farm would not conflict with the existing or proposed RV Use Ordinance as these are temporary and do not meet the threshold for *RV parks*. The problem would be if Harvest-Host includes more than one RV site, constituting an RV park. RV parks are prohibited in the AR zone (and most other rural zones). Even if RV parks were allowed, they would require a binding site plan pursuant to RCW 58.17.035 to establish the site and address services, parking, and operational impacts. Our suggestion is to consider the allowance of one RV site as accessory to the agricultural operation but recognize that more than one would conflict with existing zoning.

Concerning wineries, cideries, breweries and distilleries (WCB&Ds), we examined the State Supreme Court’s decision in *King County v. Friends of Sammamish Valley* earlier on in our CPU review. The case history sets a specific and high bar for analysis, referencing impacts to viable agricultural land, transportation impacts, and impacts to rural character to name a few. In the decision, the State Supreme Court found that King County erred in allowing wineries, breweries and distilleries outright in agricultural designations, without clear ag protection standards, and that the county failed to provide adequate analysis in their SEPA review for the change. Although our SEPA Threshold Determination could be amended, Clallam County lacks the resources to provide an environmental analysis of the scope of potential development that could be experienced if such uses were allowed outright. Further, without clear and objective standards, the proliferation of such uses could result in significant impacts to the transportation network, rural character, and the County’s effort to protect agricultural land.

The potential scope of these uses suggest that analysis on a case-by-case basis would be the best approach to ensure the scope is truly subordinate to the agricultural operation, and the impacts are addressed through SEPA review. For these reasons, the following language is suggested as new policy under 31.02.115(3)(h):

(h) Clallam County should support the promotion of agritourism as a means for expanding farm operations and diversifying the local agricultural business model. In addition to the policy articulated under CCC 31.02.115(3)(c), agriculturally related businesses, such as wineries, cideries, distilleries and breweries, along with tasting rooms, restaurants, or other retail components, could be considered in certain settings if appropriately scaled and designed to fit a supporting role in the broader agricultural operation. Such developments would likely require the conditional use permitting process to ensure impacts from traffic, noise, scope of development, protection of agricultural land and rural character, and other operational characteristics were addressed.

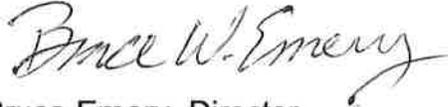
Other Items. Other items discussed during the February 18th meeting include:

- Draft Findings: Conclusion 4 addresses only compliance with GMA but does not incorporate visioning, which is also part of the CPU process. Since GMA compliance is addressed in Conclusions #2 & 3, and visioning under Conclusion #5, my recommendation is we simply eliminate Conclusion #4.
- Notice to title for known archaeological sites. I discussed the matter with Legal Counsel. They advised that, because notice through SEPA only applies to development of a specific size and scope (Commercial development > 4,000 SF, subdivisions greater than four units, etc.), the policy could not be applied uniformly in all situations. A person could apply for a SEPA-exempt building permit to place a home on a parcel, and no archaeological review would occur. That same person could apply for a subdivision of the property, and SEPA review would include notice to the Department of Archaeological and Historic Preservation and area tribes. That process could indicate a high probability of artifacts, leading to the need for an archaeological survey. If artifacts are found, presumably, that's when notice to title would be required. Because of this difference, significant liability exists on part of the County. He recommends not pursuing notice to title for the presence of artifacts.
- Amended AR Zone section (33.07.010(1)), ending in same note about suspension as in other locations referencing the TDR Program:

[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.]

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

Sincerely,

A handwritten signature in cursive script that reads "Bruce W. Emery". The signature is written in black ink and is positioned above the typed name.

Bruce Emery, Director
Clallam County DCD

**State Environmental Policy Act (SEPA) WAC 197-11
DETERMINATION OF NON-SIGNIFICANCE and
ADOPTION OF EXISTING ENVIRONMENTAL DOCUMENT**

Proposal: Clallam County 2025 Comprehensive Plan Update

Applicant: Clallam County Department of Community Development
223 East 4th Street, Suite 5
Port Angeles, WA 98362

Description of Proposal: The proposal consists of amendments to Clallam County's Comprehensive Plan and Zoning Development regulations as follows:

- Data throughout the document has been updated to reflect recent population trends, economic data, updated studies, adoption of the Lands Capacity Analysis, Future Land Use Map, and reference to ASHTO Highway Capacity Manual 2018 for LOS methodology.
- Several sections have been reorganized to match the sequence within the GMA and include a range of text edits for internal consistency. These organizational changes are highlighted in yellow.
- Definitions have been updated and some added, including emergency housing types, as well as transitional housing.
- Include "zero lot line standards" and eliminate language concerning lot size as an alternative for housing opportunities.
- New Section added to require coordination with cities to ensure implementation of county-wide planning policies, identification of lands useful for public purposes, special consideration for achieving environmental justice and reducing wildfire risk.
- Add section regarding Climate Change and Resiliency Issues, establishing objectives and measures.
- Addition of language for modification to UGA boundaries where a clear public benefit exists.
- Expand language concerning multimodal transportation consistent with GMA requirements.
- Establish new standards for Accessory Dwelling Units in UGA's in accordance with RCW 36.70A.681.
- Changing approximately 46.7 acres within the unincorporated Sequim Urban Growth Area from Sequim Urban Residential II (SR-II) to Sequim Urban Residential III (SR-III).
- Changing all of the current Urban Residential High (URH) Designation to the Urban Moderate Density (MD) designation within the Clallam Bay/Sekiu UGA.

Location of Proposal: This proposal would apply throughout the unincorporated portions of Clallam County.

Title of documents being adopted: Final Environmental Impact Statement for the Clallam County Comprehensive Plan, issuance date of June 16, 1995. This document is the final environmental impact statement regarding the updated 1995 Clallam County Comprehensive Plan. Final Supplemental Environmental Impact Statement (FSEIS) for the Carlsborg Urban Growth Area, issued August 8, 2000. This document is the final EIS for the designation of Carlsborg as an Urban Growth Area. There are no challenges to these documents.

SEPA: The updates to the Comprehensive Plan and development regulations are a non-project action (per WAC 197-11-704(2)(b)). Phased review is a component of a non-project action. The lead agency determines the appropriate scope and level of detail of environmental review to coincide with meaningful points in the planning and decision-making processes. Environmental review may be phased if it assists agencies and the public to focus on issues that are ready for decision and exclude from consideration issues not yet ready. Broader environmental documents may be followed by narrower documents such as site specific analysis (project specific) per WAC 197-11-060(5) of SEPA Rules. When project actions to implement these regulations are proposed, these project actions will be subject to further environmental review.

Clallam County is the lead agency for this proposal. Clallam County has determined that the proposed amendments to the Comprehensive Plan and Development Regulations would not have a probable significant adverse impact on the environment based on a review of a completed environmental checklist, proposed amendments Comprehensive Plan and Development Regulations and the Final Environmental Impact Statement for Clallam County in 1995. This information is available to the public upon request and at: <https://www.clallamcountywa.gov/1842/Comprehensive-Plan-Update>

APPEALS: This may be the only opportunity to comment on the environmental impacts of the proposal. Unless the Responsible Official withdraws the threshold determination pursuant to WAC 197-11-340(3)(a), the threshold determination shall be final at the end of the comment period. Agencies and interested parties will be notified if the threshold determination is withdrawn. The threshold determination may be appealed as part of the Board of County Commissioner's final decision regarding adoption of the amendments to the Comprehensive Plan. Contact the Responsible Official for SEPA appeal procedures.

This Determination of Non-Significance (DNS) for this non-project action is issued February 11, 2026 under WAC 197-11-340(2).

Comments on this DNS must be submitted by March 26, 2026.

Signature:



Bruce Emery, Responsible Official
Department of Community Development (DCD)
223 E. 4th Street, Suite 5, Port Angeles, WA 98362

SEPA¹ Environmental Checklist

Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in "Part B: Environmental Elements" that do not contribute meaningfully to the analysis of the proposal.

¹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance>

A. Background

[Find help answering background questions²](#)

1. **Name of proposed project, if applicable:** Clallam County 2025 Docket of Comprehensive Plan and Development Regulation Amendments
2. **Name of applicant:** Clallam County Department of Community Development
3. **Address and phone number of applicant and contact person:**
Bruce Emery, Director of Clallam County Department of Community Development, 223 E 4th St, Suite 5, Port Angeles, WA 98362 bruce.emery@clallamcountywa.gov
4. **Date checklist prepared:** November/December 2025
5. **Agency requesting checklist:** Clallam County
6. **Proposed timing of schedule (including phasing, if applicable):** Planning Commission public hearing to be continued through January 2026. Recommendation will be forwarded to the County Commissioners with a final action to take place in early 2026.
7. **Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.** Changes to the Comprehensive Plan and development regulations will require future projects to comply with adopted statutes.
8. **List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**
 - Final Environmental Impact Statement (FEIS) for adoption of Clallam County Comprehensive Plan and Regional Comprehensive Planning issued June 1995.
 - Urban Growth Area Analysis and 10-Year Review, May 2007.
 - Clallam County Comprehensive Plan Land Capacity Analysis, July 2025.
 - Comprehensive Plan Periodic Update – Housing Element Technical Analysis, October 2025.
 - Rural Lands Report, December 2006, as supplemented.
 - LAMIRDS Report (Limited Areas of More Intensive Rural Development), September 2006, as supplemented.
 - Clallam County Demographic Profile, May 2024.
 - 2025-2030 Clallam County Homeless Housing Plan, May 2025.
 - Measuring Housing Need: A Data Toolkit for Clallam County, May 2006.
 - Clallam County Capital Facilities Plan, November 2025.
 - 2025 Clallam County Climate Vulnerability Assessment, February 2025.

² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background>

- Traffic Projection Volume Map with Roadway LOS, November 2025, with Technical Memorandum, December 2025.
- Clallam County Hazard Mitigation Plan, 2025.
- Carlsborg Area Transportation Study, March 4, 2008.
- Final Supplemental Environmental Impact Statement (FSEIS) for the Carlsborg Urban Growth Area, August 8, 2000.

- 9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. No.**
- 10. List any government approvals or permits that will be needed for your proposal, if known. Final adoption by Clallam County Commissioners.**
- 11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)**

The periodic update to the Clallam County Comprehensive Plan and development regulations includes a broad range of policy and regulatory changes that will impact land use, public facilities and infrastructure, and portions of the natural environment. In general, these changes are intended to improve efforts towards environmental protection and resiliency in the face of climate change but will also introduce changes that increase the opportunity and availability of housing and economic opportunity. Specific changes that could potentially result in impacts to the natural or built environment include:

- Data throughout the document has been updated to reflect recent population trends and updated studies, adoption of the Lands Capacity Analysis, Future Land Use Map, and reference to Transportation Research Board *Highway Capacity Manual*, 7th Ed., 2022, for LOS methodology.
- Several sections have been reorganized to match the sequence within the GMA and include a range of text edits for internal consistency.
- Definitions have been updated and added, including emergency housing, emergency shelters, permanent supportive housing and transitional housing. These housing types have also been implemented within the text of the Zoning Code.
- The suspension of the Transfer of Development Rights (TDR) program pending analysis and monitoring for when economic conditions become conducive to the program's success (no TDRs utilized in 30 years)(31.02.283(3)(i)). Suspension of TDR program eliminates a substantial barrier to high-density housing, which is needed to meet affordable housing targets.
- Policy requiring the establishment of siting criteria for emergency housing (31.02.283(3)(j)).

- Include “zero lot line standards” and eliminate language concerning lot size as an alternative for housing opportunities (31.02.283(3)(b)).
- New Section added to require coordination with cities to ensure implementation of county-wide planning policies, identification of lands useful for public purposes, special consideration for achieving environmental justice and reducing wildfire risk.
- Policy framework establishing a process for determining and siting of essential public facilities (31.02.300(8)).
- Prioritizing culvert replacements and fish-barrier removals as a priority, utilizing Lead Entities to provide assistance in identifying priority projects (31.02.340(1)(f)).
- Add section regarding Climate Change and Resiliency Issues, establishing objectives and measures (31.02.810 and .820).
- Requirement that the County perform an inventory and self-evaluation concerning accessibility requirements of the Americans with Disabilities Act (ADA) and making corrections where needed (31.02.420(1)(e)(vii)).
- Included a range of text edits for internal consistency and to promote economic prosperity. Policies could lead to growth in manufacturing, tourism, timber industry, and maritime, and agritourism. Tourism focus will include expanding peak tourism seasons by promotion of year-round recreational opportunities. Growth in infrastructure is also prioritized (31.02.620).
- Expand language concerning multimodal transportation consistent with GMA requirements.
- Establish new standards for Accessory Dwelling Units in UGA’s in accordance with RCW 36.70A.681.
- Changing approximately 46.7 acres within the unincorporated Sequim Urban Growth Area from Sequim Urban Residential II (SR-II) to Sequim Urban Residential III (SR-III).
- Changing all of the current Urban Residential High (URH) Designation to the Urban Moderate Density (MD) designation within the Clallam Bay/Sekiu UGA.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist. The changes to the Comprehensive Plan and Development regulations will form the basis for regulatory frameworks affecting all lands within unincorporated Clallam County.

B.Environmental Elements

1. Earth

Find help answering earth questions³

- a. **General description of the site:** All: Flat, rolling, hilly, steep slopes, mountainous
- b. **What is the steepest slope on the site (approximate percent slope)?** Slopes throughout Clallam County include flat to extreme vertical slopes.
- c. **What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.** All soil types.
- d. **Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.** Clallam County includes a full range of slope stabilities. Generally, unstable slopes are avoided through application of the County's Critical Areas Ordinance.
- e. **Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.** None for this non-project action. Future projects will be reviewed and mitigation required to address these concerns.
- f. **Could erosion occur because of clearing, construction, or use? If so, generally describe.** Not directly from this non-project action. Future projects will be reviewed and mitigation required to address these concerns.
- g. **About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?** This is a non-project action so this is not applicable. Future development has the potential to introduce impervious surfaces across the landscape, within the limits established by applicable land use and environmental regulation.
- h. **Proposed measures to reduce or control erosion, or other impacts to the earth, if any.** This is a non-project action. Future development will be subject to drainage plan requirements, and where applicable, standards of the Critical Areas Ordinance or the Shoreline Master Program.

2. Air

Find help answering air questions⁴

- a. **What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe**

³ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth>

⁴ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air>

and give approximate quantities if known. None. This is a non-project action. Future development allowed under these changes will be evaluated on a case-by-case basis for potential impacts.

- b. **Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.** No, this is a non-project action. There is the potential for off-site sources of emissions or odor to impact future developments and uses. Future developments will be reviewed on a case-by-case basis, and if the potential for such impacts are present, mitigation will be required. In some cases, like ongoing commercial forest or agricultural operations, such nuisances are tolerated in the interest of protecting these preferred land uses. Notice to property owners is required under 33.40.110 to help alert residents to the risks.
- c. **Proposed measures to reduce or control emissions or other impacts to air, if any:** None. See notice requirements, 33.40.110. Other future land uses with the risk of air emission impacts will be evaluated on a case-by-case basis.

3. Water

Find help answering water questions⁵

- a. Surface:

Find help answering surface water questions⁶

- 1. **Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.** There are a variety of water bodies around the County.
- 2. **Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.** Not as a part of this non-project action. Future development may occur within 200-feet of designated shorelines or aquatic habitat areas and will be reviewed for compliance with current regulations.
- 3. **Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.** Not as a part of this non-project action. It is not possible to estimate the amount of fill or dredge material from future development.
- 4. **Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.** Not as a part of this

⁵ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water>

⁶ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water>

non-project action. Future development proposals may involve surface water withdrawals or diversions, but will be evaluated on a case-by-case basis.

5. **Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.** Not as a part of this non-project action. Future development may occur within the 100-year floodplain but will be reviewed on a case-by-case basis and will be required to follow current regulations.
6. **Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.** Not applicable for this non-project action. Future development may include discharges of waste materials to surface waters, but will be reviewed on a case-by-case basis.

b. Ground:

[Find help answering ground water questions⁷](#)

1. **Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.** Changes to the zoning code and Zoning Map that will increase density in Urban Growth Areas will occur in areas already served by public water and sewer. Before development occurs the water purveyor and public sewer provider will be contacted to ensure availability to allow higher density development. If wells and septic systems are proposed they will be installed according to health regulations, including consideration of adequate room for well-head protection, septic and reserve. This will likely preclude high density development in areas not served by public water and sewer.
2. **Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.** It is not possible to determine the number or location of future septic systems, or the uses for which they are intended. Generally, higher-density land uses (high-density residential, commercial, industrial) will be served by public sewer and water. Those that rely on onsite systems will be evaluated at the time of application for adequacy and use consistent with environmental health regulations.

c. Water Runoff (including stormwater):

1. **Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.** None anticipated for this non-

⁷ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater>

project action. Future development will likely produce runoff. Area wetlands, streams, rivers, and ultimately the Strait of Juan de Fuca or the Pacific Ocean, will be the ultimate destination. At a minimum, all land disturbing activities and development permits requires a project drainage permit through the Clallam County Public Works Department. This requirement is expanded for larger projects and projects that are within 200-feet of a shoreline or critical area, to require engineering.

2. **Could waste materials enter ground or surface waters? If so, generally describe.** None anticipated for this non-project action. The risk of sedimentation or other materials transport via stormwater is always a concern for new development. As noted, the drainage permit requirement addresses the concerns regarding this section.
3. **Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.** None anticipated for this non-project action. Future development could alter existing drainage patterns. However and as noted, larger projects involving significant alteration are required to have prepared an engineered drainage plan intended to control stormwater accumulation, quality and discharge rates to approximate natural conditions.
4. **Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:** None contemplated for this non-project action. For future development, rely on the existing stormwater permitting process to address concerns on a case-by-case basis.

4. Plants

Find help answering plants questions

- a. **Check the types of vegetation found on the site: All**
 - deciduous tree: alder, maple, aspen, other**
 - evergreen tree: fir, cedar, pine, other**
 - shrubs**
 - grass**
 - pasture**
 - crop or grain**
 - orchards, vineyards, or other permanent crops.**
 - wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**
 - water plants: water lily, eelgrass, milfoil, other**
 - other types of vegetation**

- b. **What kind and amount of vegetation will be removed or altered?** This is a non-project action. Any future development will be reviewed for compliance with County and State regulations on a case-by-case basis.
- c. **List threatened and endangered species known to be on or near the site.** There are ESA listed species located within Clallam County. Although there are no impacts anticipated from this non-project action, future development could potentially impact habitat relied on by one or more of these species. Implementing a policy of no net loss and implementing BAS in the shoreline and critical area protection standards will help address the concerns of this section. Subdivisions and non-exempt developments require the routing of SEPA documents to area Tribes and agencies. This process will assist in understanding whether a proposal may have a significant impact on a listed species.
- d. **Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.** None anticipated for this non-project action. As noted under (c), above, the routing of projects for comment and the application of improved protection standards will help address the concerns of this section.
- e. **List all noxious weeds and invasive species known to be on or near the site.** There are several types of noxious weeds that occur within Clallam County. The Washington State University Extension Agent's Office maintains a list and protocol for controlling, and assisting landowners in controlling noxious weeds.

5. Animals

Find help answering animal questions⁸

- a. **List any birds and other animals that have been observed on or near the site or are known to be on or near the site.** All could exist in areas affected by this non-project action.
Examples include:
 - **Birds: hawk, heron, eagle, songbirds, other:**
 - **Mammals: deer, bear, elk, beaver, other:**
 - **Fish: bass, salmon, trout, herring, shellfish, other: ALL OF THE ABOVE.**
- b. **List any threatened and endangered species known to be on or near the site.** There are ESA listed species and their designated habitats located within Clallam County. As noted, use of agency comments and application of BAS-compliant protection measures will help to protect such habitats from encroachment and impacts from future development.
- c. **Is the site part of a migration route? If so, explain.** There are migration routes in Clallam County, in particular, on the west end of the County near the Washington Coast. With the majority of this area in designated Commercial Forest land use, development

⁸ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals>

encroachment will be kept to a minimum well into the future. Critical areas shoreline protection standards will further reduce adverse impacts to waterfowl and other migratory bird corridors.

- d. **Proposed measures to preserve or enhance wildlife, if any.** The changes proposed include increases to critical area buffers in accordance with BAS that will preserve habitat for wildlife.
- e. **List any invasive animal species known to be on or near the site.** There are invasive species located within Clallam County. As noted, the WSU Extension Office operates a program for identifying and eradicating invasive encroachment.

6. Energy and natural resources

Find help answering energy and natural resource questions⁹

- a. **What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.** Currently, Clallam County relies heavily on the Bonneville Power Administration for electrical service, as administered by PUD #1 of Clallam County. Under proposed policies 31.02.820(6)(b & c), and (11)(a), as part of maintaining resilience, Clallam County will be supporting efforts to explore alternative, local energy generation.
- b. **Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.** Use of solar energy is supported under the Comprehensive Plan Update (31.02.820(2)(b), and (6)(b&c)).
- c. **What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.** Although a non-project action, proposed policies include provisions to reduce energy use and resilience (31.02.820(2&3)).

7. Environmental health

Health Find help with answering environmental health questions¹⁰

- a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.**
 - 1. **Describe any known or possible contamination at the site from present or past uses.** None anticipated for this non-project action. Sites that are known to be contaminated must be restored before further site-disturbing activities are allowed.

⁹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou>

¹⁰ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health>

2. **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.** None anticipated for this non-project action. Areas known to contain contaminants must be restored before further site disturbance or new development. These matters are managed on a case-by-case basis with protocols tailored to the specific site conditions and nature of the contamination.
 3. **Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.** None anticipated for this non-project action. See subsection 2, above.
 4. **Describe special emergency services that might be required.** None anticipated for this non-project action. Increases in density may require additional emergency services and will be reviewed as part of any proposed development resulting from the proposed changes to the Comprehensive Plan and development regulations.
 5. **Proposed measures to reduce or control environmental health hazards, if any.** None anticipated for this non-project action. Specific changes/increases in emergency response services will be based on growth as it occurs. Based on changes proposed to the Comprehensive Land Use Map, the only likely place will be the Sequim Urban Growth Area. Fire District #3 already approved a levy resulting in significant revenue increases for the district, and eliminating the need to consider other funding mechanisms, such as impact fees.
- b. **Noise**
1. **What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?** None anticipated for this non-project action.
 2. **What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?** None anticipated for this non-project action. Future development could result in significant noise impacts to neighboring properties. Uses that could generate such impacts will be reviewed under SEPA and reasonably conditioned to address such issues.
 3. **Proposed measures to reduce or control noise impacts, if any:** The SEPA process allows the DCD to review project proposals for potential impacts, including noise. Substantive authority allows for reasonable conditions to address noise impacts, such as barrier and vegetation buffering, hours of operation, or even project denial.

8. Land and shoreline use

Find help answering land and shoreline use questions¹¹

- a. **What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.** This is a non-project action; however, future land use allowed under these changes will affect the character of the community into the future. One of the main objectives of land use planning is to direct development to areas with similar development characteristics so that conflicts can be minimized, such as industrial uses within industrial parks, businesses within commercial centers, and residences within established neighborhoods. In reliance on this principle, the impacts of new development should be minimal if appropriately located by zoning.
- b. **Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?** Not applicable, this is a non-project action. Several areas throughout Clallam County have a history of agricultural use, and agriculture still remains viable in the eastern portion of the County. Strategies have been implemented to support farms and avoid the conversion of commercial farmland to non-farm uses. Strategies to supplement farms through agritourism and other supportive-scale commercial uses have had a positive impact on the continuation of agriculture. The County has supported the Conservation Futures program, which has resulted in the purchase of development rights for 81.9 acres of prime farmland, currently, and 173 acres pending. Once acquired, the purchase of development rights will preserve the lands from future development indefinitely.

The proposed changes also include suspending the Transfer of Development Rights (TDR) program. Although designed to help protect commercial agricultural lands, economic conditions in Clallam County have not supported the use of the program. Not one TDR has occurred in Clallam County in the program's 30 years of existence. As such, it is not currently protecting agriculture but is acting as a barrier to affordable housing. Conditions will be monitored by the County, and the program will be reinstated once market factors are supportive of the program's success.

- c. **Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?** Not anticipated for this non-project action. Farmland is distributed through rural Clallam County and often has neighbors of low and moderate-density residential areas. Clallam County has a right-to-farm policy in which property owners are provided notice if within 500 feet of designated agricultural lands or commercial forest lands. The notice (33.40.110) advises the owner of designated agricultural land's (or commercial forest) right to practice farming (or

¹¹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use>

forestry), and that nuisance complaints will not be investigated unless the activity is operating outside of best practices.

- d. **Describe any structures on the site.** None anticipated for this non-project action.
- e. **Will any structures be demolished? If so, what?** None anticipated for this non-project action. Demolition of buildings in the future is anticipated to replace old and dilapidated structures.
- f. **What is the current zoning classification of the site?** This is a non-project action.
- g. **What is the current comprehensive plan designation of the site?** This is a non-project action making changes to the Comprehensive Plan and development regulations.
- h. **If applicable, what is the current shoreline master program designation of the site?** All shoreline designations as they currently exist within the County for this non-project action.
- i. **Has any part of the site been classified as a critical area by the city or county? If so, specify.** Yes. All critical area designations will exist throughout the County for this non-project action.
- j. **Approximately how many people would reside or work in the completed project?** Changes to the comprehensive plan are proposed to reallocate higher residential densities within the Urban Growth Areas of Clallam Bay/Seki and Sequim to meet the affordable housing requirements of the Growth Management Act and the change to development regulations will allow additional accessory dwelling units on property within UGA's.
- k. **Approximately how many people would the completed project displace?** This is a non-project action. Future development could create real estate and economic opportunities that, in some cases, might result in the displacement of economically challenged residents. Policies to avoid displacement are being proposed (31.02.281(2) and .320(3)).
- l. **Proposed measures to avoid or reduce displacement impacts, if any.** As noted, 31.02.281(2) requires measures to avoid the displacement of low, very low, and extremely low-income households as local communities develop. Also, 31.02.320(3) requires that infrastructure investments consider the potential for displacement impacts before implementing.
- m. **Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.** Changes to the Comprehensive Plan are being proposed to ensure compatibility with existing land uses and plans and the projected growth and opportunities within the County in compliance with the Growth Management Act. The proposed draft has been reviewed and found to be internally consistent, and consistent with the Clallam Countywide Planning Policies, and as proposed, all development regulations.

- n. **Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:** See discussion under subsections (b) and (c) above.

9. Housing

Find help answering housing questions¹²

- a. **Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.** In determining future population growth over the 20-year planning horizon, Clallam County relied on the Housing for All Planning Tool, method C (HAPT C), as provided by the Department of Commerce. Under the medium growth projected, the HAPT C projected a population increase by 2045 of 9,545 people, bringing the County's total to 86,700. Translating the population growth to projected housing needs based on household income, the HAPT C model produced the following:

	0-30% AMI						Emergency Housing (temp)	Total	
	Non-PSH *	PSH *	>30-50%	>50-80%	>80-100%	>100-120%			>120%
City of Forks	100	45	92	37	13	10	2	27	326
Forks UGA	10	5	9	4	1	1	0	3	33
City of Port Angeles	664	299	605	241	85	63	13	173	2143
Port Angeles UGA	100	45	91	37	13	10	2	27	325
City of Sequim	623	280	568	227	80	61	11	164	2014
Sequim UGA	100	45	91	37	13	10	2	27	325
Clallam Bay/Seki UGA	10	5	9	4	1	1	0	3	33
Joyce UGA	0	0	0	0	0	0	0	0	0
Carlsborg UGA	60	27	55	22	8	6	1	16	195
Unincorporated Rural	0	0	0	124	44	34	812	0	1014
Total:	1667	751	1520	733	258	196	843	440	6408

- b. **Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.** No anticipated housing will be lost due to this non-project action. As noted, the new policies include antidisplacement provisions to avoid unintended impacts on economically challenged households. The recommendation within the Comprehensive Plan is to allocate additional housing throughout the County commensurate to where the need is anticipated.

¹² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing>

- c. **Proposed measures to reduce or control housing impacts, if any:** The Comprehensive Plan is intended to provide recommendations for the allocation of housing units throughout the County to address housing needs.

10. Aesthetics

Find help answering aesthetics questions¹³

- a. **What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?** This is a non-project action and does not propose any structures.
- b. **What views in the immediate vicinity would be altered or obstructed?** This is a non-project action. Impacts of future development will be addressed on a case-by-case basis.
- c. **Proposed measures to reduce or control aesthetic impacts, if any:** This is a non-project action. Aesthetic impacts resulting from future development will be addressed on a case-by-case basis.

11. Light and glare

Find help answering light and glare questions¹⁴

- a. **What type of light or glare will the proposal produce? What time of day would it mainly occur?** There is nothing proposed for this non-project action. The strengthening of policies under 31.02.340(11)(b) will help to address impacts to nighttime glare resulting from new development.
- b. **Could light or glare from the finished project be a safety hazard or interfere with views?** This is a non-project action and is not applicable. The changes to 21.02.340(11)(b) address the concerns of this section.
- c. **What existing off-site sources of light or glare may affect your proposal?** Not applicable.
- d. **Proposed measures to reduce or control light and glare impacts, if any:** changes proposed to 31.02.340(11)(b) will reduce uncontrolled nighttime light and minimize glare impacts from new development, once implemented.

¹³ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics>

¹⁴ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare>

12. Recreation

Find help answering recreation questions

- a. **What designated and informal recreational opportunities are in the immediate vicinity?** There is no specific site involved in this non-project action. Formal and informal recreation opportunities exist throughout Clallam County.
- b. **Would the proposed project displace any existing recreational uses? If so, describe.** There are no recreational sites or established uses that are likely to be impacted or displaced as a result of the changes being considered to the Comprehensive Plan or development regulations.
- c. **Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:** No recreational opportunities will be reduced or eliminated by these policy changes. Specific changes to 31.02.820(10)(c) will help ensure parks and recreational facilities are resilient to climate change and continue to meet the needs of the community.

13. Historic and cultural preservation

Find help answering historic and cultural preservation questions¹⁵

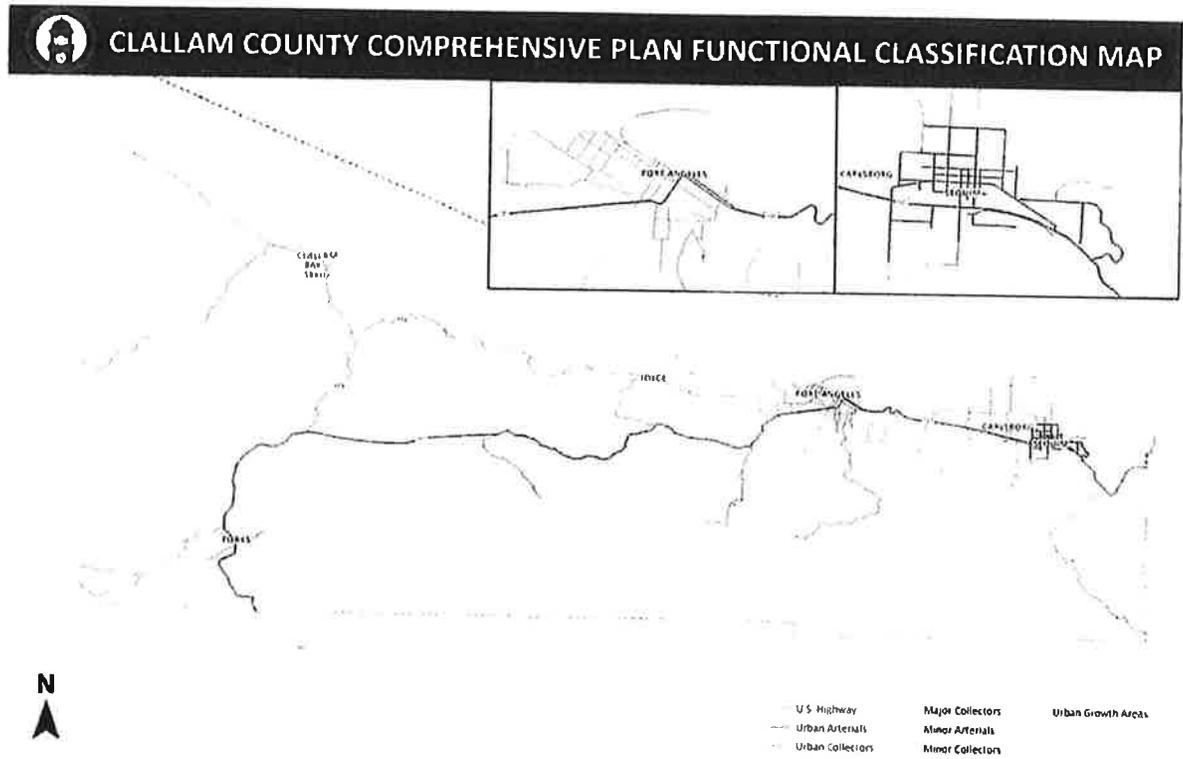
- a. **Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.** There are historic buildings, structures and sites throughout Clallam County.
- b. **Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.** There are areas of cultural significance and material artifacts throughout Clallam County.
- c. **Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.** Presently, Clallam County provides notice to area Tribes and the Department of Archaeological and Historic Preservation as part of the SEPA review process. Areas of concern and requests for protection measures are addressed through the final SEPA determination at the project level.
- d. **Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.** Section 31.02.350 incorporates several changes requested by area Tribes to strengthen the review and conditioning of new development to avoid impacts to areas of known artifacts, historic or cultural significance.

¹⁵ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p>

14. Transportation

Find help with answering transportation questions¹⁶

- a. **Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.** The motorized transportation network for Clallam County consists of arterials, major and minor collectors and local access roads. The following map shows the distribution of Federally Functional Classification for the County's major roadways:



- b. **Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?** Clallam Transit provides service throughout Clallam County.
- c. **Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).** No. The only changes being considered to land use density are within the Clallam Bay/Seki UGA and the unincorporated Sequim UGA. An increase in residential density within the Clallam Bay/Seki UGA is required in order for the County to meet its housing targets for low, very low and extremely low-income households. Current zoning does not allow for high-

¹⁶ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation>

density residential developments (e.g. apartments), which are needed to provide affordable housing to these segments. However, the growth trend in the Clallam Bay/Seki UGA is very slight. Only 48 new residential units are expected to be needed over the next 20 years. Even though the capacity created by the zoning change is significant, the realistic expectation of growth is minimal, which should result in no significant change beyond what has already been expected under existing plans.

In the Sequim UGA, a total of 147 high-density residential units are needed to meet the projected needs of low, very low and extremely low-income households. Because the market is more active in Sequim, changes in density are expected to achieve related results over the 20-year planning horizon. Consideration has been given to increasing the residential density of two discrete neighborhoods within the UGA, totaling 47.1 acres. An analysis, similar to that which was conducted for the 2025 Land Capacity Analysis, was completed for these two neighborhoods, contemplating a change from the current S(R-II) zone to the S(R-III) zone (change from maximum of five units/acre to 10 units/acre). Although the area included is 47.1 total acres, after removing currently developed parcels, accounting for vacancy, parcels with additional capacity, and applying a uniform market factor, the net usable acreage is determined to be 22.0 acres, with a high-end capacity of 220 additional units.

An earlier version of this analysis, contemplating 17.5 acres (adjusted) and a high-end capacity of 175 additional units, was incorporated into a traffic analysis that projected traffic counts out to the end of the 20-year planning horizon and calculated its impact on intersection levels of service (see Exhibit L). The analysis found that all intersections evaluated met adopted LOS standards over the 20-year projection. The difference between the zoning change evaluated in the traffic analysis (175 units) and the currently proposed change (220 units) is 45 maximum residential units. Utilizing the Trip Generation Manual of 10 trips per day per unit, full buildout of this potential would produce 450 additional trips per day. In applying this unaccounted-for demand to the projection model, the increase in trips per day, even if all were concentrated at one intersection, would not trigger any change in LOS. This information verifies that the proposed changes in zoning will not adversely impact the transportation network over the 20-year planning horizon.

- d. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.** As part of the Economic Development element, commercial water transportation is contemplated and promoted to take advantage of the Port of Port Angeles as a deep-water port in close proximity to the region's industrial core. This, however, is within the jurisdiction of the City of Port Angeles and the Port. Air transportation continues to be supported, but policy changes are not substantive.
- e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates? This is a non-**

project action. Future development under the new policies are expected to generate additional traffic. In particular, analysis was completed for intersection impacts within the Sequim UGA (see above). Other impacts are expected to be commensurate with development scenarios already contemplated under earlier versions of the Comprehensive Plan.

- f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.** The proposed changes to the Comprehensive Plan are not anticipated to affect movement of products within the County.
- g. **Proposed measures to reduce or control transportation impacts, if any:** Nothing is proposed. Specific projects resulting from the updates to the Comprehensive Plan will be reviewed at the time of those project proposed.

15. Public services

Find help answering public service questions¹⁷

- a. **Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.** The changes proposed do not anticipate immediate increases in public services. These services will increase commensurate with new development.
- b. **Proposed measures to reduce or control direct impacts on public services, if any.** The Capital Facilities Plan (Appendix I) and Sections 31.02.320(5) and .420(6)(e), require that the Land Use Element be reevaluated should funding needed to meet public service facility needs fall short.

16. Utilities

Find help answering utilities questions¹⁸

- a. **Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:** Various utilities exist throughout the County. The propose changes are not anticipated to affect availability of utilities.
- b. **Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.** There are no changes to utilities based on the changes to the Comprehensive Plan that are proposed. Individual projects resulting from the proposed changes will be reviewed when proposed.

¹⁷ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services>

¹⁸ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities>

C. Signature

Find help about who should sign¹⁹

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

X Bruce W. Emery

Type name of signee: Bruce Emery

Position and agency/organization: Director, Clallam County Department of Community Development

Date submitted: 12/30/2025

D. Supplemental sheet for nonproject actions

Find help for the nonproject actions worksheet²⁰

Do not use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

- 1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?** The proposed changes to the Comprehensive Plan will not create any discharge to water, emission to air, involve toxic or hazardous substance, or result in the production of noise.
 - **Proposed measures to avoid or reduce such increases are:** Nothing proposed.
- 2. How would the proposal be likely to affect plants, animals, fish, or marine life?** The proposed change to the Comprehensive Plan will have no affects to plants, animals, fish, or marine life. The Plan requires continued refinement of best available science and its

¹⁹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature>

²⁰ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions>

regulatory application, including provisions of the Critical Areas Ordinance, which will be completed within 12-months of adoption.

- **Proposed measures to protect or conserve plants, animals, fish, or marine life are:** Per the GAP analysis and review of BAS, it has been determined that expanded buffer widths that coincide with site potential tree height will implement what is considered to be best available science. Additionally, riparian buffers will be treated as critical areas. These changes alone represent significant improvements in the conservation of plants, animals, fish and marine life throughout Clallam County.

3. How would the proposal be likely to deplete energy or natural resources? Increase in the number of houses and businesses will require a draw from existing energy resources, but the anticipated growth is not enough of a change to necessitate changes to the existing infrastructure in the County. Proposed changes will add density in existing urban growth areas.

- **Proposed measures to protect or conserve energy and natural resources are:** Individual projects and construction of houses will be reviewed for compliance with energy regulations and critical area and shoreline codes.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands? The proposed changes to the Comprehensive Plan will not affect environmentally sensitive areas. As noted above, standards are being considered to match wetland and riparian buffers to site potential tree height.

- **Proposed measures to protect such resources or to avoid or reduce impacts are:** Existing and proposed changes to the regulations will ensure development meets standards imposed by the State and BAS.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans? The proposed changes will increase the density allowed within UGA's and allow an additional accessory dwelling unit to be constructed within UGA's.

- **Proposed measures to avoid or reduce shoreline and land use impacts are:** Existing and proposed regulations will ensure protection measures of the shoreline.

6. How would the proposal be likely to increase demands on transportation or public services and utilities? The changes to the Comprehensive Plan will allow for some areas

of greater densities within Urban Growth Areas. As noted earlier, the current transportation network has been evaluated and determined to be adequate to meet the future demand.

- **Proposed measures to reduce or respond to such demand(s) are:** None. The proposed changes will not result in a loss of service on the transportation or public services and utilities.
- 7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.** The proposed amendments to the Comprehensive Plan and the development regulations are in response to the need to remain compliant with the Growth Management Act. There will be no conflicts with local, state, or federal laws for the protection of the environment.

CPU Policy Response Table 3: Public/Agency Testimony

Clallam County Comprehensive Plan Update Summary of Public Testimony and Corresponding Recommendations as of February 19, 2026.

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

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

CPU Policy Response Table 3: Public/Agency Testimony

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

CPU Policy Response Table 3: Public/Agency Testimony

<p>local energy sources. Otherwise, it leaves the community vulnerable. Change rejected by PC, 2/4/26</p>	<p>from gas/diesel-powered to electric-powered or other renewable energy sources, where feasible and practicable. The same should be pursued concerning gas-powered maintenance equipment.”</p>
<p>3) Emailed Testimony received from Ed Bowen, 11/5/25.</p>	<p>Requests retaining the PRC Vision Statement presently articulated under CCC 31.06.010. Staff agrees with approval of this request.</p>
<p>4.a) Washington Department of Fish and Wildlife, 11/5/2025. The Voluntary Stewardship Program (VSP) is a highly successful program that creates incentives and assistance through the Conservation District to increase protections for critical areas occurring on agricultural lands. Rejected by PC, 11/19/25.</p>	<p>Proposed edits to CCC 31.02.120(6). “Agricultural land users shall be encouraged to maintain water quality, protect fish and wildlife habitat consistent with commercial agriculture and prevent erosion of valuable agricultural soils. <u>To achieve this, Clallam County will pursue enrollment in the Voluntary Stewardship Program (VSP) in partnership with the Clallam Conservation District, to create a non-regulatory approach to protecting critical areas on agricultural lands.</u>”</p>
<p>4.b) Washington Department of Fish and Wildlife, 11/5/2025. The proposed change is consistent with tenants of the GMA. Note, “forest” was not stricken per comments as this appears to have been an error in the comment. Rejected by PC 2/4/26.</p>	<p>Proposed edits to CCC 31.02.140(1). “Retain and prevent conversion of <u>designated commercial-suitable</u> forest land in the County in commercial forest land use, because of general economic benefits to the people of the County derived from forests, including timber production and processing, watershed conservation, recreation, and fish and wildlife conservation.”</p>
<p>4.c) Washington Department of Fish and Wildlife, 11/5/2025. The comments accurately cite WAC 365-196-480(2)(e) as requiring analysis of commercial forest lands on a <u>countywide basis</u>. Rejected by PC 2/4/26.</p>	<p>Proposed edits to CCC 31.02.140(24). “Land designated as commercial forest shall remain in this classification unless a strong case can be made that the zoning could be changed without affecting the commercial viability of the surrounding forest land <u>on a countywide basis</u>. Zone change applications shall meet one of the following criteria.”</p>
<p>4.d) Washington Department of Fish and Wildlife, 11/5/2025. Changes intended to</p>	<p>Proposed edits to CCC 31.02.150(3). “Environmental impacts of mineral extraction can be substantial. Aggregate production temporarily</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>better align with WAC 197-11-768, 365-190-080 and 365-196-830.</p>	<p>obliterates entire minesite ecosystems, but this loss can be <u>mitigated/minimized</u> with carefully sequenced reclamation. The effects of truck traffic can be a primary concern in designating construction aggregate mines. Damage to river beds can be another major impact of mining. Channel bar scalping can reduce the probability of flooding but can also change the river-bed morphology <u>and result in cascading ecological impacts harming fish populations and aquatic habitat functions</u>. Possible reduction of the quantity of groundwater is a concern in new mineral sites...”</p>
<p>4.e) Washington Department of Fish and Wildlife, 11/5/2025. Suggested language to improve clarity.</p>	<p>Proposed edits to CCC 31.02.2560(1)(d). “An <u>adequate</u> buffer is required <u>adequate</u> to ensure that harvesting of timber or crops on adjacent resource lands is not precluded.”</p>
<p>4.f) Washington Department of Fish and Wildlife, 11/5/2025. Changes to align with WAC 365-190-080 and 365-196-830.</p>	<p>Proposed edits to CCC 31.02.2560(1)(h). “The master planned resort is consistent with development regulations of the County to protect critical areas <u>to ensure no net loss of ecological functions and values</u>.”</p>
<p>4.g) Washington Department of Fish and Wildlife, 11/5/2025. Implements full mitigation sequence per WAC 197-11-768.</p>	<p>Proposed edits to CCC 31.02.2560(1)(i). “On-site and off-site infrastructure impacts are fully considered and <u>follow the full mitigation sequencemitigated</u>.”</p>
<p>4.h) Washington Department of Fish and Wildlife, 11/5/2025. Reflects language and intent of WAC 365-190-080 and 365-196-830.</p>	<p>Proposed edits to CCC 31.02.340(1)(c). “The critical areas ordinance shall be utilized by Clallam County to help achieve environmental objectives <u>including no net loss of critical area function and values</u>, prevent environmental degradation, and to manage land use activities within the natural and intrinsic constraints of the landscape...”</p>
<p>4.i) Washington Department of Fish and Wildlife, 11/5/2025. Proposed language is internally consistent with prevention being less problematic than restoration. Rejected by PC 2/4/26, this portion only.</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

<p>This portion accepted by PC 2/4/26.</p> <p>4.j) Washington Department of Fish and Wildlife, 11/5/2025. Given the process identified earlier under Comment # 1.c, staff does not support this change.</p>	<p>planning and implementation of proper land use practices <u>and conservation measures.</u>"</p> <p>Proposed edits to CCC 31.02.340(1)(f). "Clallam County shall prioritize <u>culvert replacement and similar issues that presently result in identifying and removing</u> 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 shout<u>will</u> work to <u>implement</u>achieve alternatives for sewage treatment plant discharges to marine waters.</p> <p>(b) <i>Policy 17.</i> Clallam County shall preserve the scenic, aesthetic and ecological qualities of the marine shorelines of Clallam County, in harmony with those uses which are deemed essential to the <u>life</u> <u>and safety</u> of its residents. Clallam County shall implement marine resource goals through the Clallam County Shoreline Master Program and/or critical areas ordinance, as now or hereafter amended.</p> <p>(c) <i>(New Policy 18).</i> <u>Clallam County shall locate and design new development to avoid the need for future shoreline stabilization to the extent feasible.</u>"</p>
<p>4.l) Washington Department of Fish and Wildlife, 11/5/2025. Maintaining habitat connectedness is a substantial part of ecosystem health.</p>	<p>Proposed edits to CCC 31.02.340(7)(a). "Land use practices should protect, <u>connect</u>, and enhance habitat corridors, diversity and richness, and ensure protection <u>and connection</u> of wildlife corridors and habitat for threatened and endangered species. Wildlife corridors and riparian</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>4.m) Washington Department of Fish and Wildlife, 11/5/2025. Amend 31.02.340(9)(a) to limit development in flood hazard areas, preserve ecological functions and maintain public access.</p> <p>Rejected by PC, 2/4/26.</p>	<p>areas should be maintained as important community infrastructure <u>and to promote wildlife diversity across connected landscapes.</u>"</p> <p>Proposed edits to CCC 31.02.340(9)(a). "Flood control should be undertaken in the context of varied uses including agricultural and residential, fish and wildlife habitat, water supply, open space, and recreation. Land use and related regulations and zoning should reflect the natural constraints of floodplains, meander zones, and riparian habitat zones <u>and limit development within these areas.</u> Flood control measures should <u>reserve preserve ecological and community benefits such as floodplain functions and public access opportunities to the fullest extent possible opportunities for other uses, including public access.</u>"</p>
<p>4.n) Washington Department of Fish and Wildlife, 11/5/2025. Avoidance of impacts are preferable to minimizing or mitigating impacts.</p>	<p>Proposed edits to CCC 31.03.195(5)(b). "<u>Avoid and M</u>inimize the public costs and potential dangers associated with inappropriate development in frequently flooded areas, geologically hazardous areas, wetlands, fish and wildlife <u>habitat</u> conservation <u>habitat</u> areas, and areas with a critical recharging effect on aquifers."</p>
<p>4.o) Washington Department of Fish and Wildlife, 11/5/2025.</p>	<p>Proposed edits to CCC 31.05.210(6)(a). Eliminate reference to "state listed" with respect to bald eagles (no longer state-listed, only Federal).</p>
<p>4.p) Washington Department of Fish and Wildlife, 11/5/2025. Bald eagles are a federal issue, not state.</p>	<p>Proposed edits to CCC 31.05.210(6)(c). "Clallam County should work with the <u>U.S. Fish and Wildlife Service</u>Washington Department of Wildlife to develop an advanced Bald Eagle Management Plan for designated priority bald eagle habitat in the vicinity of Clallam Bay/Seki Urban Growth Area."</p>
<p>4.q) Washington Department of Fish and Wildlife, 11/5/2025. Incorporating "retrofitting" is consistent with Subsection (3)(b). Rejected by PC, 2/4/26.</p>	<p>Proposed edits to CCC 31.02.820(3)(a). "Develop or modify building standards to reduce the impacts of climate change on indoor and outdoor building features. This may include requiring low-impact development <u>and retrofitting existing buildings</u> and stormwater runoff..."</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>4.r) Washington Department of Fish and Wildlife, 11/5/2025. Staff concurs that maintaining larger tracts of land is integral to ecosystem health and one of the key benefits provided by forest lots.</p>	<p>Proposed edits to CCC 31.02.820(7)(b). “Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate refugia and critical habitats to strive for no net loss of ecosystem attributes, with a focus on achieving net ecological gains. Expand habitat protection, quality, and connectivity through designations such as conservation areas, expanded buffers, <u>maintaining large blocks of commercial and private forest lands</u>, greenbelts, wildlife and open space bridges and corridors. Incorporate climate considerations in determining permissible activities within wetlands and wildlife habitats.”</p>
<p>5) Emailed testimony received from Phyllis Sprinkle, 11/8/25. Supports adoption of policies for the protection of nighttime sky from the impacts of glare, consistent with recommendations from DarkSky Olympic Peninsula (see Public Comment, # 44).</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>6) Emailed testimony received from Nancy Field, 11/8/25. Same as # 5, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>7) Emailed testimony received from Pete Saari, 11/9/25. Same as # 5, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>8) Emailed testimony received from John Gussman, 11/10/25. Same as # 5, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>9) Emailed testimony received from Jan Standish, 11/10/25. Same as # 5, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>10.a) Jamestown S’Klallam Tribe, November 19, 2025. Definitions.</p>	<p>Propose new definition under CCC 31.02.050(187): <u>“Environmental Justice” means the fair treatment and meaningful involvement of all people regardless of race, color, national origin, tribal affiliation, disability</u></p>

CPU Policy Response Table 3: Public/Agency Testimony

<ul style="list-style-type: none"> • Add definition for “Environmental Justice (recommends using Dept. of Commerce’s definition).” • Full definition rejected by PC on 2/4/26. Recommend alternative as included. • Define “Best Available Science.” • Full definition rejected by PC on 2/4/26. Recommend alternative as included. 	<p>or income with respect to the development, implementation and enforcement of environmental laws, rules and policies that affect human health and the environment. Environmental justice ensures that laws, rules and policies help protect vulnerable and overburdened communities from unfair environmental and health impacts. It focuses on providing equal access to resources and benefits, preventing harm, and creating sustainable and thriving communities for everyone.”</p> <p><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> <p><u>Recommend a new Section 31.02.050(7):</u> <u>“Best Available Science (BAS),” means the current and best available scientific information derived from valid scientific processes, including peer review, standardized methods, logical conclusions and reasonable inferences, quantitative analysis, proper context, and references, consistent with the criteria specified under WAC 365-195-900 through .925. BAS also incorporates a synthesis of the current scientific body of knowledge meeting the criteria specified within this definition.”</u></p> <p><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>
<ul style="list-style-type: none"> • 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 	<p>Propose edits to CCC 31.02.050(32)(j): “Areas that foster and reflect a strong sense of community ties, local identity, and shared rural values through land use patterns that support gathering spaces, civic institutions, and integrational continuity. These areas promote social cohesion by maintaining development scales and zoning that reinforce community interaction, volunteerism, and locally rooted traditions.”</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>connection, clarify that this would be through focused or targeted zoning in already developed areas. Change rejected by PC, 2/4/26.</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. Language modified by PC, 2/4/26</p>	<p>CCC 31.02.100(2) is verbatim language from RCW 36.70A.150. Recommended language may be better located under CCC 31.02.340.</p> <p>Propose new Section 31.02.340(1)(hg): “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 acquisition and 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"> • Include a Section that clearly indicates that local Tribes be included in the planning process before development agreements are completed. • Amend Section (g) to recognize need for preservation of agricultural and forest lands, and sensitive habitats when considering MPRs. <p>Portion under (1)(k), modified by PC; portion under (1)(g), rejected by PC 2/4/26.</p>	<p>Propose new Section CCC 31.02.250(1)(k): “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.”</p> <p>Propose edits to Section CCC 31.02.250(1)(g): “The County finds that the land is better suited, and has more long-term economic importance, for the master planned resort than for no longer viable for the commercial management and harvesting of timber, and is not currently or likely to be placed in or agricultural production, if located on land that otherwise would be designated as forest or agricultural land of long-term commercial significance.”</p>
<p>10.d) Jamestown S’Klallam Tribe, November 19, 2025. Amend Environment and Open Space Policies (31.02.340):</p>	<p>Propose edits to Section 31.02.340(1)(b): “Prevention is less expensive than cleaning/reversing up pollution and ecosystem impacts later. Clallam County should consider the potential impacts and costs of treatment, or remediation and restoration for environmental</p>

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<ul style="list-style-type: none"> • Section (1)(b): Add to the sentence the following underlined additions: "Prevention is less expensive than reversing pollution and ecosystem impacts later. Clallam County should consider the potential impacts and costs of treatment, remediation and restoration of environmental degradation resulting from land use practices, before such practices are allowed." • Section (1)(e): Add to the sentence the following underlined additions: "Clallam County shall work with other agencies, tribes and individuals to prevent additional listing, uplisting or local population 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." • New Section (1)(g): Add subsection G. Policy no. 7 as an addition to the new policy no. 6 to 32.02.340(1): "Clallam County will prioritize removal or retrofitting infrastructure that is placed within channel migration zones of streams and rivers to minimize negative impacts to fish and wildlife." • New Section (4)(d): Make the final sentence of 31.02.340(4)(c) its own section D to highlight its importance and improve clarity and scope. Suggested change: "(D) Policy 13. Clallam County 	<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&W (# 4.i, above) already changed the dynamic of the section.</p> <p>Proposed new Section 31.02.340(1)(g): <u>"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>Propose new Section 31.02.340(4)(d): <u>"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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<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>Change rejected by PC, 2/4/26.</p>	<ul style="list-style-type: none"> i. <u>Updating aquifer mapping and flow patterns focusing on vulnerability assessments related to sea level rise and saltwater intrusion.</u> ii. <u>Analyzing the impacts of climate change on groundwater supply, integrating projected future water demand, and assessing the feasibility of groundwater supplementation.</u> 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>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"> • 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. <p>Language modified by PC, 2/4/26.</p>	<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>
<ul style="list-style-type: none"> • 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, 	<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>

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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"> • Section 31.02.820(1)(c) should include technical assistance for shifting to high-value, low water-use crops. “Encourage farmers to adopt sustainable business practices such as regenerative farming, water storage, shift to high-value, low water-use crops and upgrading irrigation.” • Section 31.02.820(3)(b): Consider adding to the sentence “Specific activities to support energy justice may include expanding low-income energy assistance programs, promoting existing weatherization incentives and assistance, 4 upgrading cooling infrastructure in facilities serving vulnerable populations, and implementing alternatives like preserving and increasing tree cover, shade structures and other passive cooling designs.” <p>Language modified by PC, 2/4/26.</p> <ul style="list-style-type: none"> • Section 31.02.820(4)(a): Consider adding to the sentence “This may include incorporating riparian and stream habitat conservation measures into land use and infrastructure (transportation, water, sewer, 	<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 <u>expanding low-income energy assistance programs, promoting existing weatherization incentives and assistance</u>; 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>infrastructure (transportation, water, sewer,</p>	<p>Propose amending Section 31.02.820(4)(a): “ ... This may include incorporating riparian and stream habitat conservation measures into land use and infrastructure <u>plans to protect salmonoid habitats</u> (transportation, water, sewer, electricity and zoning) <u>plans to protect</u></p>

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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"> 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.” 	<p><u>salmonid habitats</u>, developed by the County in partnership with cities, Tribes, service providers, and state agencies.”</p> <p>Propose amending Section 31.02.820(7)(a): “Policy 7.1: Prepare ecosystems for climate impacts by implementing restoration actions for streams, wetlands, and watersheds, focusing on <u>habitat connectivity</u>, reducing invasive species, and improving watershed processes. This includes restoring riparian vegetation, floodplains, and stream structures to protect native fish and other aquatic life. Enhance habitat and community resilience to climate change by protecting and restoring coastal ecosystems, 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.”</p>
<p>Language modified by PC, 2/4/26.</p> <ul style="list-style-type: none"> Section 31.02.820(7)(b): Consider rewording the first sentence to – “Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate change-mitigating 	<p>Propose amending Section 31.02.820(7)(b): “Policy 7.2: Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate <u>change-mitigating systemsrefugia</u> and critical habitats <u>that provide valuable ecosystem services. At a minimum,</u>”</p>

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<p>systems and critical habitats that provide valuable ecosystem services. At a minimum, ensure no net loss of ecosystem function with a focus on achieving net ecological gains.”</p> <ul style="list-style-type: none"> Section 31.02.820(12)(b): Consider adding an additional sentence to the effect of – “Promote lawn alternatives through xeriscaping and other low-water use, low maintenance designs. Clallam Conservation can provide direct consulting or provide resources to landowners to help facilitate lawn conversions and create co-benefits of reducing water use and promoting native species that support local wildlife and pollinators.” The Section 31.02.820(12)(e): Consider adding an expansion of water reuse by publicly owned treatment works to this section. 	<p><u>ensure</u> strive <u>for</u> no net loss of ecosystem <u>functions</u>attributes, with a focus on achieving net ecological gains...”</p> <p>Propose amending Section 31.02.820(12)(b): “ ... Encourage residents to reduce water consumption through smart grid water use, repairing infrastructure, water reclamation systems, smart irrigation technologies, and updated water rates to discourage lawn watering. <u>Promote lawn alternatives through xeriscaping and other low-water use, low maintenance designs. The Clallam Conservation District can provide resources to landowners to help facilitate lawn conversions and create co-benefits of reducing water use and promoting native species that support local wildlife and pollinators. Promote incentives for sustainable food cultivation.</u>”</p> <p>Propose amending 31.02.820(12)(e) “ ... This includes maximizing on-site natural gas co-generation from anaerobic digesters, exploring the proximity of wastewater facilities to high-risk areas, and <u>improving wastewater access routes, and expanding water reuse by publicly owned treatment facilities.</u>”</p>
<p>10.f) Jamestown S’Klallam Tribe, November 19, 2025. Amend Sequim-Dungeness Regional Plan (CCC 31.03.455): Clallam County should articulate a strategy to address nearshore impacts from residential use in low-bank shoreline areas along the Strait of Juan de Fuca, in the Dungeness-Jamestown neighborhood focus section. The section should discuss the water quality concerns and challenges of siting and</p>	<p>Propose new Section 31.03.465(3): Shorelands.</p> <p><u>(a) Policy 5. The areas of Three Crabs Road, Seashore Lane, and portions of Jamestown Road and Jamestown Beach Lane are located within a low-bank shoreline area where impacts from upland immediately adjacent development can result in substantial impacts to the near-shore environment. As identified climate risks, sea level rise and increasing magnitude and frequency of storm events also place such areas at risk of substantial harm from erosion, flooding, salt-water intrusion and septic failure due to inundation. The Clallam County Shoreline Master Program (SMP) is identified as an element of the</u></p>

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<p>maintaining septic systems in high saturation areas. The section should also discuss the nearshore impacts and concerns from residential nearshore armoring and outline the requirements Clallam County established for designated critical habitat of listed species under 5 the Endangered Species Act. This section should summarize the steps the County will take to engage the low-bank shoreline neighborhoods to proactively reduce/limit the harmful nearshore impacts and develop meaningful compensatory mitigation for impacts that cannot be remediated in the short-term.</p> <p>Language Modified by PC, 2/18/26.</p>	<p><u>Clallam County Comprehensive Plan and is the primary regulatory authority for shoreland use pursuant to RCW 90.58. The following should be considered in developing a community and regulatory approach to addressing these changing conditions:</u></p> <ul style="list-style-type: none"> <u>(i) Suitability of the area to accommodate septic systems and potable wells in the context of changing conditions, given the potential impacts of bacterial contamination and risk of system failures.</u> <u>(ii) Increase risks to property and improvements, the commensurate increase in demand for additional protective shore armoring, and the cumulative impacts such as armoring will have on adjacent properties and the nearshore environment, including impacts to designated critical habitat for species listed under the Endangered Species Act.</u> <u>(iii) Pursue broad public outreach with the intent of educating area residents on the risks associated with shoreline occupancy, problem solving, identification and execution of community-derived solutions with community engagement and input rather than continuation of a piece-meal approach that merely reacts to individual circumstances.</u> <u>(i) A systematic approach for identifying impacts and development of meaningful compensatory mitigation consistent with no-net-loss requirements under WAC 173-26-201(2)(c) for unavoidable impacts from shore protection measures and development.</u>
<p>11.a) Addendum to Jamestown S'Klallam Tribe, November 19, 2025, Comments (Received 11/26/25). Agricultural resource land inventory and issues 31.02.115: Consider removing or adapting (2) bullet point three: "Preservation</p>	<p>Recommend removal of 31.02.115(2), Bullet 3: Preservation of valuable historic and cultural resources;</p>

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<p>of <i>valuable historic and cultural resources</i>". Agricultural land only preserves cultural resources that are below the plow zone and other agricultural land disturbances. The act of plowing impacts significant cultural resource information by disturbing the resources from their original context and potentially removing archaeological features which can yield important information about tribal history.</p>	
<p>11. b) Addendum to Jamestown S'Klallam Tribe, November 19, 2025, Comments (Received 11/26/25).</p> <ul style="list-style-type: none"> • Historic and cultural resources polices 31.02.3530: a. Overall, the Tribal Historic Preservation Office (THPO) believes these policies provide insufficient guidance on preservation of cultural resources. THPO recommends the removal of Policy 1 and 2. b. • THPO recommends adding Policies 1, 2, and 3 from the Clallam County Shoreline Master Plan 35.25.160 listed below with the following edits: i. "(1) Sites and resources having known or suspected archaeological, historic, or cultural value should be protected. These sites/resources are important, nonrenewable resources and many are in danger of being damaged or lost because of ongoing development. Wherever possible, sites should be permanently 	<p>Recommend removal of 31.02.350(1) and (2)(b): (1) <u>"Policy 1- All jurisdictions should work individually and cooperatively to identify, record, study and encourage the preservation, maintenance and use of lands, sites, and structures that have historical and archaeological significance. The early identification and resolution of conflicts between preservation of historical or archaeological resources and competing land uses should be promoted and facilitated."</u></p> <p>(2)(b) <u>"Cooperatively plan, implement, and maintain corridor management plans for all proposed and existing Washington State Scenic and Recreational Highways (Hwy. 101 and Hwy. 112). Identify the long-term landscape character desired for scenic and recreational highways and their related cultural resources, and implement landscape maintenance practices appropriate to ensure the resources' lasting character."</u></p> <p>Propose adding new subsections (b) through (d) to 31.02.350(2): <u>"(b) Sites and resources having known archaeological, historic, or cultural value should be protected. These sites/resources are important, nonrenewable resources and many are in danger of being damaged or lost because of ongoing development. Wherever possible, known sites</u></p>

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<p>preserved for scientific study and/or public observation consistent with 36 CFR 800 and Chapter 27.53 RCW. If the presence of an archaeological site is unknown then a survey should be conducted by an archaeologist. ii. (2) Proposed development on or adjacent to an identified archaeological, historic, or cultural site should be designed and operated to be compatible with continued protection of the archaeological, historic, or cultural site. iii. (3) The location of historic, cultural, and/or archaeological sites/resources should not be disclosed to the general public unless adequate provisions can be put in place to ensure long-term protection and preservation of such sites/resources.”</p> <ul style="list-style-type: none"> • THPO recommends the current 31.02.3530 Policy 3. be updated with a more extensive list of cultural resources regulations the County is required to follow including but not limited to: Clallam County Shoreline Master Plan, Executive Order 21-02, SEPA, RCW27.53, RCW 68.60, WAC 25-48, WAC 25-46, RCW 42.56.300, RCW 27.44, RCW 68.50, etc 	<p><u>should be permanently preserved for scientific study and/or public observation consistent with 36 CFR 800 and Chapter 27.53 RCW. If the presence of an archaeological site is suspected, then a survey should be conducted by an archaeologist.</u></p> <p><u>(c) Proposed development on or adjacent to an identified archaeological, historic, or cultural site should be designed and operated to be compatible with continued protection of the archaeological, historic, or cultural site.</u></p> <p><u>(d) The location of historic, cultural, and/or archaeological sites/resources should not be disclosed to the general public unless adequate provisions can be put in place to ensure long-term protection and preservation of such sites/resources.”</u></p> <p>Propose amending 31.02.350(2): Clallam County shall recognize tribal nations in adoption of the Comprehensive Plan and development regulations. Affected tribal nations shall be notified of development applications prior to action and be given the opportunity to comment on the project's impact to tribal rights, as required by the State Environmental Policy Act.”</p>
<p>11.c) Addendum to Jamestown S’Klallam Tribe, November 19, 2025, Comments (Received 11/26/25). Climate Change and Resiliency Goals and Policies 31.02.820 a. Goal 4. Cultural</p>	<p>Propose amending 31.02.820(4)(b): “Policy 4.2: Work with local Tribes to co-manage and protect <u>archaeological and sacred sites</u>, and <u>cultural properties, ecosystems, traditional foods, plants and resources</u> from climate-related threats...”</p>

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<p>Resources & Practices i. Policy 4.2: Recommend the following additions: Work with local Tribes to co-manage and protect archaeological and sacred sites, cultural properties, ecosystems, traditional foods, plants, sacred sites and cultural properties from and resources from climate-related threats...”</p>	<p>[Change rejected by Planning Commission, 1/7/2026.]</p>
<p>11.d) Addendum to Jamestown S’Klallam Tribe, November 19, 2025, Comments (Received 11/26/25). Sequim-Dungeness Regional Plan: a. Rural land – Inventory analysis 31.03.260 (8) Historic and Cultural Resources: i. Recommend including the terms tribal cultural resources, sacred sites, and traditional cultural places in the list of resources of significance</p>	<p>Recommend amending 31.03.260(8): “Historical and Cultural Resources. The Sequim-Dungeness regional planning area has plentiful historical and cultural resources. Resources of significance include <u>tribal cultural resources, sacred sites, and traditional cultural places</u>, the Dungeness School, John Hyer Farm, Blue Mountain School, Emery Farmstead, Dungeness River Bridge, Manis Mastodon Site, McAlmond House, U.S. Quarantine Station Surgeon’s Residence, New Dungeness Light Station, New Dungeness, Graveyard Spit, Gierin Farmstead, Port Williams, and Washington Harbor.”</p>
<p>12) Email from John Worthington (received 12/03/2025). Comments included:</p> <ul style="list-style-type: none"> • Urging concise and clear language in the Comprehensive Plan. • Concerning environmental conservation, urged use of “measurable, evidence-based policy.” • Provided specific inference to utilizing 3% grades for protecting salmon spawning habitat, identifying the same was established for the Jimmycomelately Creek project that proved successful. 	<p>No policy recommendation.</p> <ul style="list-style-type: none"> • Agreed that policy language should be clearly articulated. • Included several changes implementing/requiring Best Available Science (BAS), including: 31.02.050(7), 31.02.340(1)(a) & (c), 31.02.810(3), and 31.02.820(13(a)). • Depending on the species, salmon are able to spawn in a wide range of stream gradients. Further, salmon restoration includes consideration of water quality throughout the stream system drainage/watershed, including multiple factors such as riparian stability, shade, needle and wood recruitment, etc. Jimmycomelately

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<ul style="list-style-type: none"> • Urged referencing the Jimmycomelately project to provide historical context for strategies that have proven effective in salmon recovery. • Specifically requesting that “Jimmycomelately science should be written into the Clallam County Comp Plan, because the GMA requires BAS.” 	<p>was successful because the team was able to match action steps to specific system needs. While some components are transferable to other systems and watershed, not all are or in the same measure applied.</p> <ul style="list-style-type: none"> • The Comprehensive Plan requires application of BAS in the recovery of salmonids. Although successful given the conditions of Jimmycomelately Creek, it would not be appropriate to apply a one-size-fits-all approach. It would certainly NOT meet BAS.
<p>13) Email from John Worthington (received 12/04/2025). Testimony included:</p> <ul style="list-style-type: none"> • Estimate of economic impact of failure to provide salmon restoration. • Description of the “fixed meandering coil” design that was used for restoring Jimmycomelately Creek, with design elements. • Explanation that the same design elements should be applied to the Dungeness, Elwha and Tumwater Rivers. • Inclusion of an aerial map of the Jimmycomelately project showing former and reconstructed channel, with request that the map be included in the Comprehensive Plan. • Proposed design elements for the three river systems identified. • Assertion that the Dungeness is not being managed as Jimmycomelately Creek has been. • Request to the BOCC that funding for the Dungeness Off-Channel Reservoir Project be halted until the river is modified to slow 	<p>No policy recommendation.</p> <ul style="list-style-type: none"> • The economic impacts of anadromous fish losses widely known. Because continuation of species is theoretically indefinite, the actual financial benefit is unknown or could accurately be described as infinite. • The “meandering coil” or constructed channel meanders worked well in Jimmycomelately creek. However, the volume and energy gradients present in the Elwha and Dungeness rivers suggests that a fixed-meander approach detailed in the aerial maps would not be successful. • As noted earlier, each system has its own specific needs regarding restoration, and should be tailored accordingly. • Most of the same people involved in the Jimmycomelately project are also involved in the restoration of the Dungeness River. • The slowing of river velocities on the Dungeness would involve reopening the floodplain to allow for volume and energy dissipation as it existed prior to settlement. The main problem is people live

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<p>velocities using the same “fixed meandering coils” used on Jimmycomelately Creek.</p> <ul style="list-style-type: none"> • A series of four aerial photos of reaches of the Dungeness along with proposed locations for the “fixed meandering coils.” 	<p>there. The Off-Channel Reservoir Project would provide supplemental irrigation water during low-flow periods, which addresses one of the key problems facing the Dungeness.</p> <ul style="list-style-type: none"> • As noted, such improvements within the Dungeness system would likely not work, give the increased volumes and energy. Constructed log jams do achieve the same energy-reducing effect and is being applied throughout the river system.
<p>14) Postcard testimony received from Eva Young & Family, received 12/8/25. Supports adoption of policies for the protection of nighttime sky from the impacts of glare, consistent with recommendations from DarkSky Olympic Peninsula (see Public Comment, # 44).</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>15) Postcard testimony received from Pamela Ziemann, received 12/8/25. Same as #14, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>16) Second postcard testimony received from Eva Young & Family, received 12/8/25. Same as #14, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>17) Additional email testimony received from Luke Strong-Cvetich, Jamestown S’Klallam Tribe (received 12/9/25). Testimony included:</p> <ul style="list-style-type: none"> • Requests that the data under Figure 9, 2024 County Profile reflects Reservation and Trust land area of two square miles, and concerns over the accuracy of the population estimate for the same. 	<p>Recommend amending Figure 9 (Table) to reflect Jamestown S’Klallam Tribal Reservation & Trust land area of two acres, and incorporating a foot note concerning the accuracy of the census data regarding Tribal Trust and Reservation lands.</p> <p>Recommend amending 31.03.435(5): “<i>Transportation (Policy 5)</i>. Impacts to Highway 101 from development in Blyn must be mitigated. Improvements to intersections of County roads and Highway 101 will be required for new development which increases traffic congestion. AA</p>

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<ul style="list-style-type: none"> • Requests that 31.03.435 be amended to “replace ‘overpass’ with multimodal safety improvements’ to reflect current Tribal discussions with WSDOT. <p>Language Modified by PC, 2/18/26.</p>	<p>overpass on Highway 101 should be considered if traffic congestion caused by development of the casino impacts the regional mobility of the highway.”</p>
<p>18) Testimony received from Andy Sallee, Sequim Valley Airport, dated 12/2/2025. Testimony mirrored public comments received in January concerning expanding allowed uses within Airport Overlay District for Sequim Valley Airport. Recent comments requested allowing “short term cabin rentals, overnight camping, restaurant and food facilities.”</p> <p>[change approved by PC, 1/7/2026.]</p>	<p>Under Public Comment #38, amending language was recommended for 31.03.340(8)(d), to allow consideration of “...vacation rentals and other limited lodging services” for Zone 3 of the Airport Overlay. Zone 3 of the Airport Overlay includes approximately 20 acres, of which about five has been developed with aviation-related buildings a taxiways. This leaves a substantial area that could be developed to whatever extent is allowed by Zoning. If “cabin rentals, overnight camping, restaurants and food facilities” were allowed outright and without limitations, the site could evolve into a resort destination. However, appropriately scaled, subordinate support businesses, such as a (one) small restaurant and incidental rental dwellings, could assist with the economic viability of the airport without introducing significant objectionable activities or characteristics. The details should be developed as part of a future (2026) update to the Zoning Code.</p> <p>For this purpose and for discussion, Staff proposes the following edits to 31.03.340(8)(d): “The County shall ensure the continued viability of the Sequim Valley Airport, including assurance that adjacent land uses do not cause conflicts with the continued use and maintenance of the airport. <u>This may include exploring the feasibility of expanding allowed uses within the Airport Development (Zone 3) portion of the Airport Land Use Compatibility Overlay to include vacation rentals or other limited lodging services, small-scale restaurants at a scale commensurate and subordinate to the airport, and other limited commercial services designed and limited to serve aviation uses and traveling customers.</u>”</p>

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<p>19) Post card with hand-written testimony, received from the Matthiess Family, dated 12/10/2025. Same as #14, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>20) Post card with hand-written testimony, received from Martha Rudersdorf, dated 12/10/2025. Same as #14, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>21) Emailed testimony received from John Worthington, 12/16/2025. Original email also included emailed testimony from #13, above and appears to continue that discussion. Testimony included:</p> <ul style="list-style-type: none"> • Testimony advocates for use of BPA power utility easements for co-locating pipelines or aqueducts. • Advocates that an aqueduct system transferring water from high-volume watersheds to ow-volume would be preferable to the off-channel reservoir on the Dungeness River. 	<p>No specific policy recommendations is proposed. No change is recommended.</p>
<p>22) Letter of Testimony from Clallam County Marine Resources Committee, LaTrisha Suggs, Chair, dated 12/17/2025. Testimony was in two parts; second part included specific recommendations for test edits to the CP, which included: 31.02.340 "Environment and open space policies" • (1)(c) Policy 3. The Critical Areas Ordinance and the Shoreline Master Program shall be utilized by Clallam</p>	<p>Recommend not adopting change. Two-year periodic review is far too frequent. DCD does not have the resources to keep pace with such a schedule, especially with other mandates required by law.</p>

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County to help achieve environmental objectives, prevent environmental degradation, and to manage land use activities within the natural and intrinsic constraints of the landscape and shoreline. The ordinances shall be amended as necessary to implement watershed or special area studies and to maintain consistency with the Comprehensive Plan. Practices under this chapter should be evaluated ~~periodically~~ regularly (at least every two years) to ensure regulatory effectiveness in achieving stated objectives and fair notification to affected property owners.

- (d) Policy 4. Education and incentives should be provided to the public on a regular basis to ensure their understanding of the principles behind regulatory protection and to increase support for protection outside of the regulatory framework.

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

- (a) Policy 16. Clallam County ~~should shall~~ work to avoid achieve alternatives for sewage treatment plant discharges to marine waters (unless they achieve tertiary treatment) for and new or failing on-site septic systems subject to storm surge or sea level rise.

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

Changes already proposed to subsection (6)(a) per comments from Washington Department of Fish & Wildlife, per Testimony 4.k, above.

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<p>in protection, maintenance and restoration of habitat.</p> <ul style="list-style-type: none"> • (c) Policy 20. Clallam County shall recognize the large number of salmon and steelhead stocks, <u>forage fish, and shorebird nesting areas,</u> that have been classified as critical or depressed. The County shall work toward prevention of these stocks-species from being listed as threatened and endangered through habitat restoration and land use practices which cause no further degradation to habitat needs. • 31.02.340 "Environment and Open Space Policies" (8) Runoff and Erosion. (Policy 21) Stormwater quality and quantity should be managed to protect shellfish beds, fish habitat, and other resources; <u>to protect the integrity of coastal bluffs;</u> to prevent the contamination of sediments from urban runoff and combined sewer overflows; and to achieve standards for water and sediment quality by reducing and eventually eliminating harm from pollutant discharges from stormwater and combined sewer overflows. This goal should be achieved through a variety of means including: 	<p>Recommend adopting policy change. Although anadromous fish species are priorities, all species that are critical or depressed are priority species of concern and should be protected.</p> <p>Per 1/21/26 discussion, the following is suggested as the 2nd sentence: "The County shall <u>work-use habitat restoration and land use practices</u> which <u>cause no further degradation to habitat needs as means fortoward prevention</u> of these <u>stocks-species</u> from being listed as threatened and endangered <u>through habitat restoration and land-use practices</u> which <u>cause no further degradation to habitat needs.</u>"</p> <p>Recommend adopting policy change. Emphasis on coastal bluffs is critical to near-shore processes. Protecting marine bluffs from accelerated erosion caused by uncontrolled stormwater discharges is important in protecting natural processes.</p> <p>Recommend adopting policy change per rationale above. Per 1/21/26 discussion, suggest the following edits: "Protection of coastal bluffs and bluff vegetation by preventing unmanaged drainage <u>resulting from development or human alterations to the landscape.</u>"</p>
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<ul style="list-style-type: none"> • <u>Protection of coastal bluffs and bluff vegetation by preventing unmanaged drainage.</u> <p>31.02.340 “Environment and Open Space Policies” (9) Floodlains and Marine Shorelines.</p> <ul style="list-style-type: none"> • (a) Policy 22. Flood control should be undertaken in the context of varied uses including agricultural and residential, fish and wildlife habitat, water supply, open space, and recreation. Land use and related regulations and zoning should reflect the natural constraints of floodplains, meander zones, and riparian habitat zones <u>including estuaries and marine shorelines subject to sea level rise.</u> Flood control measures should reserve to the fullest extent possible opportunities for other uses, including public access. • (b) Policy 23. Flood control should be undertaken in the context of an ongoing, systematic and comprehensive approach to basin management and preservation, <u>and for marine shoreline reaches subject to storm surge or sea level rise.</u> Changes in land use should try to restore the natural character of rivers, <u>and streams, estuaries and marine shorelines</u> whenever reasonably possible. Public understanding of the various uses and limitations associated with flood control should be improved through a variety of educational 	<p>Recommend not adopting this change. Some changes are noted as more appropriately located under Subsection (6), <i>Marine Resources.</i></p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend not adopting change. The scope of DCD’s duties are wide and varied. Public outreach is achieved when opportunities are available</p>
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efforts implemented on a regular basis. A stable, adequate, and publicly acceptable long-term source of financing should be established and maintained for comprehensive basin management and for comprehensive shoreline reach management.

- (c) Policy 24. To limit potential for infrastructure damage from major and minor flood events, low intensity land use activities including agricultural and recreational land uses in riverine floodplain areas and marine shorelines should be encouraged, and other land uses in these areas discouraged. The need for emergency measures should be reduced or prevented through planning, structural, and nonstructural measures with a strong preference for nonstructural habitat restoration measures.
- (d) Policy 25. To protect riverine habitat from flood damage and recognize upstream and downstream effects from flood management activities, Clallam County should require best management practices for maintaining natural river channel configurations during dredging and gravel removal. Nonstructural measures are preferred over structural measures, but, when structural methods are necessary, they shall not obstruct fish passage. Structural flood control measures should shall preserve or

and resources, such as grant opportunities, become present. Obligating the Department to regular efforts in this regard is over-committing.

Recommend adopting policy change. In this context, policy is appropriate.

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

Recommend adopting policy change. In this context, policy is appropriate.

Recommend not adopting this change. Other environments could potentially be impacted, not just "riverine."

Recommend adopting policy change. In this context, policy is appropriate.

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

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

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

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

- 31.02.340 “Environment and Open Space Policies” (12) Nonpoint Source Pollution.
- Policy 30. Water resources shall be maintained in the highest quality and quantity to support recognized beneficial uses. To achieve this in the most efficient

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<ul style="list-style-type: none"> • (8) Goal 8. Emergency Management. Promote and implement communication, transportation response, and education on preparedness and recovery efforts to ensure that all members of the Clallam County community are ready for climate emergencies. <u>both gradual (such as sea level rise or drought frequency) and catastrophic (such as storm surge or wildfire).</u> Anticipate and be ready to accommodate the rise in demand for short- and long-term emergency services due to climate change impacts and understand community <u>and individual neighborhood</u> needs when preparing for emergency situations. • <i>The MRC recommends that the County provide notice and disclosure to current, future and prospective purchasers of properties with designated critical areas or shorelines of potential hazards and nuisances and the potential for land use regulations.</i> <p>31.02.250 [As amended] Master planned resorts land use policies.</p> <ul style="list-style-type: none"> • (1)(h) The master planned resort is consistent with development regulations of the County to protect critical areas to ensure <u>long-term net gain, no net loss of ecological functions and values with no net loss.</u> 	<p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend no policy change. Notice to Title is required for all permits issued within 200-feet of a wetland (27.12.215(9)), stream corridor (37.12.315(11)), landslide hazard (27.12.415(5)) or frequently flooded area (27.12.520(5)). Regulations concerning shorelines are administered under the Shoreline Management Act (RCW 90.58) and are not a part of the CPU process.</p> <p>Recommend not adopting policy change. Although “net gain” might be an appropriate goal, it exceeds recommendations from the Department of Fish & Wildlife for project-level consideration. As originally amended, the section is compliant.</p>
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<p>31.02.340 "Environment and open space policies" (3) Wetlands.</p> <ul style="list-style-type: none"> • "Clallam County shall work to achieve <u>long-term net gain</u> no net loss of regulated wetlands' functions and values through restoration and enhancement at the <u>watershed scale</u>, while allowing a <u>reasonable use of property with no net loss, at minimum</u>, with regard to their functions and values; in the short-term and should work to achieve a long-term net gain in these attributes through restoration and enhancement." <p>31.02.820 "Climate Change and Resiliency Goals and Policies" (7) Ecosystems.</p> <ul style="list-style-type: none"> • (b) Policy 7.2. Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate refugia and critical habitats with a focus on achieving net ecological gains of <u>ecosystem attributes, while striving for no net loss, at minimum</u>, 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, greenbelts, wildlife and open space bridges and corridors. Incorporate climate considerations in determining permissible 	<p>Recommend adopting policy change with the recommendation that "...in the short term" be removed. The policy changes does not obligate the County to achieve net gain at the project level, but makes it an overall (aspirational) objective. Requiring "no net loss" is a requirement of the GMA.</p> <p>Language Modified by PC, 2/18/26 to retain "no net loss" and eliminate "long-term net gain." Remainder of changes are accepted.</p> <p>Recommend adopting policy change with the recommendation that "...critical area and all other..." be removed. Expanded buffers is sufficient to communicate the intent of this section; "all other" is open-ended and could imply (such as shorelines) buffers which are beyond the statutory authority of the GMA.</p>
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<p>activities within wetlands and wildlife habitats.</p> <p>31.02.340 “Environment and Open Space Policies” (15) Oil <u>and other Hazardous Materials</u> Processing and Transmission.</p> <ul style="list-style-type: none"> • Policy 40. The coastline, coastal waters, and upland areas should be protected from the recognized problems and depreciation which could be brought about by <u>oil or crude transport</u> and oil ports and development associated with an oil port, oil storage, <u>oil or crude transport</u>, and oil pipelines. Other industries with high energy and water requirements, a high pollution component, or which are incompatible with existing industries shall not be permitted. This includes, but is not limited to, oil ports and their associated developments, crude petroleum transfer facilities, tank farms and refineries, liquid natural gas transfer facilities, petrochemical plants and nuclear power and processing plants, <u>and facilities processing any hazardous material known or proven to be hazardous.</u> <p>31.02.420 “Transportation – Goals and Policies”</p> <ul style="list-style-type: none"> • Roads and Highways. (k) Policy 11. Protect wildlife habitat and prevent watershed degradation, where possible, through: 	<p>Recommend adopting policy recommendation. Although direct authority to govern commercial maritime traffic is not vested in the County, such policy statement could provide the BOCC opportunity to request inclusion in policy and regulatory program development.</p> <p>Based on 2/18/26 discussion, recommend the edits:</p> <p>31.02.340 “Environment and Open Space Policies” (15) Oil Processing and Transmission.</p> <ul style="list-style-type: none"> • Policy 40. The coastline, coastal waters, and upland areas should be protected from the recognized problems and depreciation which could be brought about by <u>oil or crude transport</u> and oil ports and development associated with an oil port, oil storage, <u>oil or crude transport</u>, <u>and oil pipelines, and other materials with the potential for causing environmental harm. Other industries with high energy and water requirements, a high pollution component, or which are incompatible with existing industries shall not be permitted.</u> This includes, but is not limited to, oil ports and their associated developments, crude petroleum transfer facilities, tank farms and refineries, liquid natural gas transfer facilities, petrochemical plants and nuclear power and processing plants.
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(iii) New transportation arterials and major collectors which have the potential to transport hazardous materials should not be planned parallel to and in close proximity to marine or riverine shorelines. Transportation facilities ~~should~~ shall minimize the potential impact of accidental spillage of hazardous materials into any waterway.

- (2) Marine Transportation.
[NEW— language based on similar policy under Roads and Highways] (c) Policy .
Protect wildlife habitat and prevent marine water quality degradation, where possible, through:
 - (i) Due to increases in tanker, barge, container ship and cruise ship traffic, the County should advocate that expansion of marine transportation should enhance and/or restore fish and wildlife habitat.
 - (ii) Marine transportation facilities should minimize the potential impact of accidental spillage of hazardous materials into any waterway.
 - (iii) Bridges and other transportation facilities should not constrict the natural and dynamic condition of marine shorelines and estuaries.
 - (iv) Design road geometrics and drainage to intercept or minimize the transport of roadway sanding materials from entering marine shorelines.

Recommend not adopting policy change. Lakes, ponds and other “shoreline” features could be omitted. Also, “shall” is legally ambiguous; “should” provides adequate guidance.

Recommend adopting policy change. In this context, policy is appropriate.

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<p>(v) <u>Tug boat escorts are needed in more areas; home-porting is recommended for Port Angeles Harbor.</u></p> <p>(vi) <u>Ensure local spill response coordination through emergency response planning and execution, including practice exercises and training. Consult the "Strait of Juan de Fuca Geographic Response Plan" (2024) for oil spills regarding protection of sensitive marine life in each geographic area.</u></p> <p>(vii) <u>Advocate at the state level for maintaining or increasing agency spill responders in Clallam County.</u></p>	<p>Per 1/21/26 discussion, suggest the following language for (v): <u>"The need for tug boat escorts should be considered in more areas; and if determined necessary, home-porting is recommended for Port Angeles Harbor would be recommended."</u></p>
<p>23) Online testimony submittal, received from Sarah Huling, dated 12/17/2025.</p> <ul style="list-style-type: none"> • Jason and I support Clallam County's Comprehensive Plan update and the County's obligation to comply with the Growth Management Act (RCW 36.70A). Our comment is focused on implementation clarity, particularly as 	

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<p>residential densities are increased within Urban Growth Areas.</p> <ul style="list-style-type: none"> • We request that the plan clearly reaffirm concurrency, stating that the development capacity identified in the Land Use and Housing Elements is contingent upon adopted levels of service and funded, scheduled infrastructure improvements in the Capital Facilities Plan. • As zoning capacity increases, it is important that the plan clearly distinguish between mandatory GMA requirements and provisions that depend on infrastructure capacity, so future development regulations do not rely on unfunded assumptions. • With these clarifications, the plan will provide a more predictable and defensible framework for zoning decisions while continuing to meet statutory housing requirements. 	<p>Concern regarding concurrency is addressed under amended 31.02.320(6) and 31.02.420(7). No further policy change is necessary.</p> <p>As noted in 31.02.425 and Appendices I and L, growth impacts were considered with respect to facility capacities and projected growth. No further policy change is necessary.</p> <p>Agreed. No policy edits necessary.</p>
<p>24) Email from John Worthington, received 12/20/2025.</p> <ul style="list-style-type: none"> • Testimony advocates for boring projects and creek diversions to install aqueducts for supplementing stream corridors with additional flows from systems that have an abundance of water, as an alternative to off-channel reservoir projects. 	<p>No policy change is recommended. The Department of Ecology has a strong policy against diverting water resources from one watershed to another. The costs, by the author's admission, are far more substantial than the water retention projects (off-channel reservoir, active aquifer recharge) being undertaken within the watershed. It also ignores the impacts of reducing water flows from one system in order to benefit another.</p>

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25) Letter from Hoh Indian Tribe, dated 01/05/2026.

- **31.02.170 Designation of Mineral Resource Land.** As the plan states, “environmental impacts of mineral extraction can be substantial”. That level of ground disturbance can also have negative impacts on Tribal cultural assets and areas. If the County undertakes any actions that could potentially affect Tribal cultural resources, including analyzing whether resources are present in a SEPA process, the Hoh Tribal Chairperson and Tribal Historic Preservation Officer should be notified. We’d like to see Tribal consultation required and mentioned in the Comprehensive Plan so that our jurisdictions can work together and ensure valuable resources are not harmed.
- **31.02.282 Affordable housing issues, & 31.02.283 Affordable housing policies.** Developing more affordable housing in Forks and the surrounding area is a priority for Hoh Tribal members. The supply of affordable housing in the County does not currently meet demand. This affects both Tribal citizens and the Tribe’s ability to attract and retain staff members. We appreciate the variety of housing policies and hope they will lead to a larger housing supply of varied types and affordability levels in Forks, the Three Rivers area, and Beaver.

The concerns expressed are legitimate and policy that ensures adequate notice under SEPA review is appropriate. Suggest amending 31.02.170(1)(e): “The review of an application for a MRL or MRL0D designation will include a site-specific SEPA checklist and threshold determination. Tribes with Usual and Accustomed Areas within or adjacent to the site shall be provided notice of the application and consulted to ensure Tribal cultural assets are not impacted, as part of the SEPA review process...”

No policy recommendation. Several of the policies intended to support affordable housing should have a positive impact to address the concerns expressed.

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- **31.02.340 Environment and open space policies.** The Hoh Tribe is deeply invested in environmental protection and conservation. We run a robust Natural Resources Department dedicated to monitoring, restoration, and careful stewardship. We support many of the environmental policies within the Comprehensive Plan, but there are several areas in which these regulations could be strengthened to better protect our joint area's character and abundance:
 - Wetlands in WA have been overwhelmingly developed, which is deeply troubling, given their ecological importance. Right now, Policy 9 in 31.02.340 (3) calls for no net loss of wetlands. 2 While no net loss has previously been standard practice, we are seeing wetlands continue to disappear. This policy is not protecting our ecosystems. 3 It's time for bolder action. We encourage exploration and development of the "net ecological gain" or "NEG" concept in place of "no net loss".
 - The general goals of the Habitat section in the Plan align with our own, including protecting habitat, restoring degraded fish habitat, etc. However, we'd like to see more specifics that will make environmental protections more concrete. Many of the policies contain the word "should" and are framed as goals rather

Per testimony received from the MRC, changes have already been proposed in this regard (see Testimony #22, p. 30).

The use of "should" within the Comprehensive Plan and at the policy level is appropriate. The regulation (Critical Areas Code, Shoreline Master Program) is where more definitive and "concrete" language is appropriate.

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<p>than as strict requirements for development that could protect the environment.</p> <p>➤ The Environment section does not discuss required riparian buffers. While the Forest Land Use section does discuss implementing best management practices as defined by the Forest Practices Act, we also advocate for establishing riparian buffers for all other types of land use as well. The County should consider policy language that adopts stream and river buffers the width of one 200-year site-potential tree height (SPTH) measured from the edge of the active channel or active floodplain, consistent with Washington Department of Fish and Wildlife Riparian Ecosystems guidance.⁴ Current buffers averaging 50-150 feet significantly under-protect riparian functions compared to optimal 200+ foot widths for large coniferous systems essential to salmon habitat. Whether addressed in the Comprehensive Plan policies or the Critical Areas Ordinance implementation regulations, these enhanced buffer standards are essential.</p> <ul style="list-style-type: none"> • 31.02.350 Historic and cultural resources policies. Consultation and notification prior to any action that may affect Tribal lands and/or resources is always the best policy. For this reason, we support 31.02.350 Policy 3. However, this 	<p>Riparian buffers and buffers for wetlands and landslide hazard areas are established within the regulation (Critical Areas Ordinance, Shoreline Master Program). The comments are correct regarding use of the site-potential tree height (SPTH) as a standard under best available science for riparian buffers. The CPU's BAS Report and GAP Analysis both reflect this need. These documents form the basis of changes that will be made to the Critical Areas Ordinance within 12 months of adoption of the CPU, and again in the Shoreline Master Program during its update.</p> <p>Recommend amending 31.02.350(2): "Clallam County shall recognize tribal nations in adoption of the Comprehensive Plan and development regulations. Affected tribal nations shall be notified of development applications <u>or changes in development regulations</u> prior to action and be given the opportunity to comment on the project's impact to tribal rights, as required by the State Environmental Policy Act; the Clallam</p>
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<p>should be expanded beyond development applications to consultation before changing zoning regulations and before any activity that will involve ground disturbance.</p> <ul style="list-style-type: none"> <p>31.02.420 Transportation – Goals and Policies. Many Tribal members depend on public transportation around the Olympic Peninsula, including routes and connectors through Jefferson and Clallam County. In surveys we conducted about the Comprehensive Plan process, increased transportation around the Olympic Peninsula was a high priority. As Forks grows, we recommend including increased funding and support for the public bus routes that travel to Forks.</p> <p>31.02.720 Utility policies. Clallam PUD is the service provider for the Hoh Indian Reservation. Due to its remote location, power outages are frequent on the Reservation. Demand for power on the Olympic Peninsula is likely to increase as more people move to the area, more people drive electric vehicles, and summer temperatures continue to rise. Electricity is central to keeping Tribal members healthy. The Comprehensive Plan can address these future issues by prioritizing upgrades to existing infrastructure and development of additional lines.</p> <p>Emergency Management. The Hoh Indian Tribe would like to continue to work</p> 	<p><u>County Shereline Master Plan, Executive Order 21-02, SEPA, RCW 27.53, RCW 68.60, WAC 25-48, WAC 25-46, RCW 42.56-300, RCW 27.44, RCW 68.50, etc.</u></p> <p><u>Propose new section 31.02.420(3)(e): “As the City of Forks and vicinity develops, support and encourage the commensurate expansion of transit service between Forks and the rest of the Olympic Peninsula.”</u></p>
<ul style="list-style-type: none"> <p>31.02.720(6) could be expanded: “(6) Policy 6. Power and utility service providers should be encouraged to integrate resiliency and redundancy in utility service extension design, where practicable, in order to avoid service outage, disruption, and duration. <u>The PUD should be encouraged to equitably prioritize upgrades to existing infrastructure and development of service line redundancy in communities at higher risk of climate impacts, such as the west end of the County and beyond within the district’s service boundary.</u>”</p> 	<p><u>New policy 31.02.720(6) could be expanded: “(6) Policy 6. Power and utility service providers should be encouraged to integrate resiliency and redundancy in utility service extension design, where practicable, in order to avoid service outage, disruption, and duration. The PUD should be encouraged to equitably prioritize upgrades to existing infrastructure and development of service line redundancy in communities at higher risk of climate impacts, such as the west end of the County and beyond within the district’s service boundary.”</u></p>

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<p>with both Clallam and Jefferson Counties to strengthen our emergency response abilities. Due to the remote nature of the Hoh Indian Reservation and the complexity of insurance jurisdictions, among other things, it is difficult to get adequate and timely emergency services on the Hoh Indian Reservation. The Tribe has had to watch buildings burn down because there is no structural fire response on the Reservation. While the Reservation lies in Jefferson County, the proximity of Forks means that Clallam County assets are often physically closer. Whether through the Comprehensive Plan, the Hazard Mitigation Plan, or other efforts, we would like to continue to work with both Counties and the City of Forks to find multi-jurisdictional solutions that keep everyone safe.</p>	<p>The Hoh Indian Tribe has been included in the Climate Vulnerability Assessment (Exhibit K), setting the foundation for future collaboration and emergency response improvements.</p>
<p>26) Email testimony received from Ginger Wierzbowski, dated 01/20/2026.</p> <ul style="list-style-type: none"> Advocates for allowing “Harvest-Host style (RV parking) overnight stays” as a low-impact agritourism activity for farms. The comments include a range of economic benefits and help to preserve farms. <p>2/18/26 discussion, PC directed staff to expand policy consideration to include consideration of Harvest-Host and</p>	<p>No policy recommendation. With the changes adopted for Agricultural Accessory Uses (Ch. 33.48) in June 2024, bed-n-breakfast inns, vacation rentals, and work stays are an option for hosting accommodations on farms. With the recent pause in the adoption of RV use standards, it appears premature to consider additional standards that might allow one or more RV accommodations. If favored by the Planning Commission, consideration should be given to reasonable limits on the number of units allowed and facility improvements that might be required.</p>

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<p>wineries, cideries, breweries and distilleries.</p>	<p>27) Email testimony received from Judy Larson, dated 01/21/2026. Comments included seven (7) key points:</p> <ul style="list-style-type: none"> • 1) indicated that the online material (strike & underscore) was difficult to read, especially tables with new data. • 2) Suggested County demographics support that fewer people have online access. Suggested that 31.01.200(11) "Citizen participation and coordination" supports providing hard copies at libraries. • 3) Concern that comments offered during the Sequim public outreach meeting (7/23/25) would be included in the CPU record. • 4) The CPU does not adequately address 31.01.200 item 10... "and the availability of water." • 5) 31.02[.340] Environment and Open Space (7) Habitat, does not show concerns many have expressed at CCD meetings about the need to "protect, connect & enhance habitat corridors... maintain as important community infrastructure (like Sequim Prairie first irrigation ditch!!) to promote wildlife diversity across connected landscapes.
	<p>Could be screen resolution or scaling.</p> <p>Demographic profile does suggest population is aging, but the rate of online use by all age groups continues to increase. 31.01.200(11) requires DCD to encourage the involvement of citizens in the planning process. The County's CPU Public Outreach Plan, as approved by Dept. of Commerce, was followed.</p> <p>Comment #20 of Table 1, <i>Public Comments and Corresponding Recommendations</i>, includes the comments received and staff's recommendation in response.</p> <p>New policy under 31.02.340(4)(d) and 31.02..820(12) directly address this concern, in addition to other modified and existing policies.</p> <p>No policy recommendation. Amendment to 31.02.340(7)(a), directly addresses the concerns raised.</p>

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<ul style="list-style-type: none"> • 6) 31.02.330 Has also been ignored by County's Heritage Committee for protecting this SP ditch from piping. • 7) 31.03.455 This has several areas still needing review/updating. 	<p>Staff does not concur with this assertion. To our knowledge, irrigation ditches are not features protected under historic preservation statutes.</p> <p>No specifics were provided. The section has been reviewed and amended. No further information was provided.</p>
<p>28) Email testimony received from Dr. Sarah Huling, dated 02/06/2026. Comments included a description of the inter-agency nature of Code Enforcement, regulatory authorities involved, and potential issues related to administering enforcement through the Zoning Code.</p>	<p>Comments were submitted for informational purposes and did not suggest any policy amendments or inclusion.</p>
<p>29) Email testimony received from Judy Larson, dated 02/16/2026. Comments included three (3) key points:</p> <ul style="list-style-type: none"> • That resource/infrastructure analysis should depict where/how exempt wells and OSS locations provide vital roles for supporting the County's population. • The Sequim-Dungeness Regional Plan "needs serious revisions/updating." • Reference to Land Use Map revision (Exhibit B), citing that as the City's UGA, it should be the City that "drives the planning process," citing conflict with requirements of the GMA. 	<p>No policy change is recommended.</p> <ul style="list-style-type: none"> • The location of exempt wells and onsite sewage disposal systems are understood as essential for rural development. Their frequency is a key element in determining appropriate densities in rural areas. Inventorying their location is well beyond the reasonable scope of the CPU process. • Specific deficiencies were not identified. • RCW 26.70A.100 requires the County and cities to coordinate land use policy, including mapping. The City and County held several meetings on land use allocation and coordinated on the recommendations under consideration. There exists no conflict related to this item.
<p>30) Email testimony received from John Worthington, dated 2/18/2026. Comments included characterization of changes to the</p>	<p>No policy change is recommended.</p>

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<p>Dungeness river delta and Meadowbrook Creek alignments. The comments suggest changes have increased sedimentation in Dungeness Bay.</p>	