

AGENDA

Clallam County Planning Commission

Planning Commission Meeting of Wednesday, June 18, 2025, 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:**
- F. ANNOUNCEMENTS:**
- G. PUBLIC COMMENT on AGENDA ITEMS (not subject of hearing) – Please Limit Comments to Three Minutes**
- H. UNFINISHED BUSINESS:**
- I. PUBLIC HEARING/COMMISSION ACTION: RV Ordinance hearing:**
 - 1) Staff presentation and discussion**
 - 2) Opening of public hearing**
 - 3) Motion regarding public hearing**
 - 4) Discussion and recommendation from commission**
- J. WORK SESSION ITEMS: Lands Capacity Analysis report review**
- K. PUBLIC COMMENT – Please Limit Comments to Three Minutes**
- L. DISCUSSION OF PUBLIC COMMENTS**
- M. GOOD OF THE ORDER**
- N. ADJOURNMENT**

Members:

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

MINUTES

Clallam County Planning Commission

Meeting of May 21, 2025, 6:00 PM

- A. CALL TO ORDER: The meeting was called to order at 6:00 p.m.
- B. PLEDGE OF ALLEGIANCE.
- C. ROLL CALL: Members present were Vice-Chair Ron Long, Ken Reandeau, Katina Hester, Jane Hielman, Warren Billups, Tom Butler, Bonnie Booth, and Dann May who was present online without the ability to respond. Bruce Emery, Director, Donella Clark, Principal Planner, and Rebecca Mahan, County Habitat Biologist, represented staff from the Department of Community Development.
- D. WELCOME: Vice-Chair Long welcomed all in attendance.
- E. APPROVAL OF MINUTES: Katina Hester moved to approve, and Warren Billups seconded with a question about adding that staff had discussed the Comprehensive Plan. Language was added Good of the Order and the motion to approve the minutes with the added language passed unanimously.
- F. ANNOUNCEMENTS: It has been advertised that the Planning Commission will hold a hearing on the changes regarding RV parks on June 18, 2025.
- G. PUBLIC COMMENT PERIOD: Ed Bowen wanted to know what was meant in the notes when a comment by the public is "considered" since there was no discussion about his previous comments on the floodplain ordinance presented at the last meeting. Also wanted to understand what the purpose of Item J was and if there would be a hearing or any action taken by the Planning Commission. The proposed changes to the Channel Migration Zone will affect landowners and there were no good maps given to the public until May 13th.

Anne Anderson is a homeowner on Lake Southerland and wanted to inform everyone they are experiencing damage by boat waves; a waterline was ruined, bulkhead creating sinkholes, erosion is occurring on the shore. She requests that action be taken to reduce the damage caused by wake boats.
- H. UNFINISHED BUSINESS: None.
- I. PUBLIC HEARING ITEM: Staff presented the changes made from the last meeting and went through the comments provided by Bob Martin regarding the draft ordinance on the Open Space Ordinance. Category of Development Pressure was added to the code with a 25% reduction, which was based on the existing definition and points received in the current code. Language regarding the procedure for properties that are determined ineligible and the requested language proposed by the Assessor's office. Commission discussed the revisions and requested a few minor edits. The public hearing which had been continued was closed with no additional public comments made. Katina Hester moved to forward the ordinance with the discussed edits to the Board of County Commissioners. Bonnie Booth seconded. Motion passed 6-1.
- J. WORK SESSION ITEMS: Staff provided an overview of the Elwha Channel Migration Zone maps that are being prepared through a grant from the Department of Ecology. The current SMP maps were done before the removal of the dams and when the opportunity for the grant became available staff believed this would be an opportunity to update the maps to help landowners and County planners to better regulate development within the CMZ. No changes will be done to the SMP, but a public hearing will be held by the Board of County Commissioners on June 3rd. The Commissioners will be asked to sign a resolution regarding

the use of these maps by staff once they are approved by the Department of Ecology. Presentation to the Planning Commission was an opportunity for the public to be informed of this process. Other public engagement was completed throughout the process of updating this maps, which included surveys of land owners and the public, site visits when invited by private land owners, and presentation of materials.

- K. PUBLIC COMMENT PERIOD: Ed Bowen expressed his frustration that the Planning Commission was just filling a square in the process of the CMZ mapping. CMZ is based on modeling that are based on false science. The previous DCD director was supposed to substantiate the CMZ maps adopted in the SMP which has not been done. These maps are not a tool they are a regulation.
- L. DISCUSSION OF PUBLIC COMMENTS: Commission discussed issues occurring at Lake Sutherland. DCD is not equipped to regulate the activity and enforce no wake zones. Board of County Commissioners would be the authority to make changes. Lake Sutherland has a management district which should be involved with this issue.

Commissioner Hester wanted to comment that the commissioners do consider every comment they receive, there just may not need to be discussion on the comments. The comments on the floodplain were heard but it did not change her thoughts on the requested changes.
- M. GOOD OF THE ORDER: Commissioner Hester will not be in attendance June 4th.
- N. ADJOURNMENT: The meeting adjourned at __7:25__ p.m.



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: June 10, 2025
To: Clallam County Planning Commission
From: Bruce Emery, Director of Community Development
Re: RV Use Code Amendments, Public Hearing Draft

Discussion

The Planning Commission considered a regulatory approach to the use and occupancy of Recreational Vehicles (RVs) in Clallam County, starting on February and continuing to the present. During that time, the Commission considered a range of issues surrounding RV use and occupancy, including duration of use, number of units allowed on a parcel, services necessary for RV occupancy beyond a certain duration, and aesthetic impacts. Following their May 7th public meeting, the Planning Commission directed Staff to prepare final changes for a Public Hearing Draft Ordinance of the proposed changes and scheduling of a public hearing. The public hearing has been duly advertised in accordance with County requirements.

Code Sections Amended

Zoning Code Definitions. The Draft Amendments affect a series of sections of the County Code concerning the use and occupancy of RVs. The Definitions of the Clallam County Zoning Code (CCC 33.03.010) included several additions and amendments to existing definitions to provide clarity, to address known deficiencies, and to create internal consistency with other provisions of the County Code.

Accessory Housing standards. The Accessory Housing standards of Ch. 33.50, CCC, were also amended to allow for the distinction that accessory dwelling units (ADUs) could be manufactured homes or other dwellings authorized for occupancy by the Washington Department of Labor and Industries (L&I). In reliance on the new Zoning definitions, the Chapter was amended to prohibit RV's or other non-permanent housing from being considered as ADUs. The amended Chapter also included new provisions required under the Growth Management Act for allowing at least two ADUs per parcel, setting a minimum size restriction of 1,000 square feet, eliminating owner-occupancy requirements, and eliminating on-site parking requirements—all for ADUs located within designated urban growth areas.

Vacation Rental standards. The Vacation Rental Standards of Chapter 33.51, CCC, were amended to allow for the use of a Park Model as a short-term rental. This provision was allowed as park models are designed for short-term occupancy, and their use as a short-term rental unit could offset demand for residential dwellings for short-term rental purposes.

Prohibition of Renting Unauthorized Structures. In order to address public safety concerns, a new Section 33.40.100, CCC, was developed to establish specific prohibitions on the rental of unsuitable structures. These include unpermitted cabins or similar structures, tiny houses on wheels that do not bear the proper L&I insignia or have not been placed in accordance with Title 21, CCC, and structures that do not meet the requirements of the Clallam County Environmental Health Code (Title 41, CCC). Enforcement of violations is authorized in accordance with Title 20, CCC.

Standards for Placement of an RV. A new Chapter 33.58, CCC, is proposed for the long-term occupancy of an RV. The proposed regulation require the RV to be licensed and operational; be provided with adequate power, water, and sewage disposal; be placed according to structural setbacks and critical area protection standards; allow for no more than one RV to be occupied on a parcel; and establishes a maximum duration for occupancy of 180-days.

Process

The Planning Commission is required to hold a public hearing before formalizing its recommendation to the Board of Clallam County Commissioners (BOCC). Once the public hearing is concluded, the Planning Commission may choose to deliberate in work session on this matter. Upon conclusion of their deliberations, the Commission will forward their recommendation to the BOCC, which will also hold a duly advertised public hearing on this matter. Upon conclusion of all public deliberations, the BOCC will issue its final decision. The regulation will become effective 10 days following the final decision of the BOCC.

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

Sincerely,



Bruce Emery, Director
Clallam County DCD

Draft RV Use Code Amendments
Draft May 8, 2025

The following are excerpts from the Clallam County Code related directly or indirectly to residential use of RVs. The proposed changes shown herein are intended to clarify the County's position on uses of recreational vehicles.

Definitions, Section 33.03.010, CCC.

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

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

(5152) "Lodges" means any structurepermanent building, constructed and approved in accordance with Chapters 21.01 and 21.02, CCC, accommodating an organization which is operated not-for-profit where entrance to the premises is contingent upon the payment of a monthly or yearly fee.

(91) "Recreational Park Trailer" or "Park Model Recreational Vehicle" means a trailer-type unit that is primarily designed to provide temporary living quarters for recreational, camping or seasonal use, that meets the following criteria:

- a) Built on a single chassis, mounted on wheels; and
- b) Having a gross trailer area not exceeding 400 square feet in the set-up mode; and
- c) Certified by the manufacturer as complying with ANSI A119.5 (WAC 296-150P-0020).

Recreational park trailers shall be placed in accordance with Chapter 21.06, CCC.

(95) "Recreational Vehicle" means a vehicular type unit primarily designed as temporary living quarters for recreational camping, travel, or seasonal use that either has its own motive power or is mounted on, or towed by, another vehicle or as defined by NFPA 1192 *Standard on Recreational Vehicles*, current edition. Recreational vehicles including but not limited to: camping trailers, fifth-wheel trailers, motor homes, travel trailers, and truck campers (WAC 296-150R-0020).

(963) "RV park" means a parcel or portion thereof, or group of adjacent parcels or portion(s) thereof, intended or otherwise established campground for day use and

overnight accommodations by two or more recreational vehicles or two or more recreational park trailers, motor homes, travel trailers, truck campers and camping trailers.

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

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

- a) "Tiny House, Stick-Built" means a Dwelling Unit measuring no larger than 400 square feet in area and constructed in place in accordance with Section AQ102, Appendix Q, International Residential Code, as permitted and administered by the Clallam County Department of Community Development, Building Division.
- b) "Tiny House" or "Tiny House on Wheels" means a modular-type unit, whether constructed on a chassis or not, constructed to State Building Code standards and bearing an insignia verifying approval by the Washington Department of Labor and Industries (L&I). Use and occupancy of a Tiny House or Tiny House on Wheels requires placement on a permanent foundation approved by the Clallam County Department of Community Development, Building Division in accordance with Title 21, CCC. Once so placed, the Tiny House is considered a Dwelling Unit.

(1194) "Vacation rental" means a legally constructed ~~d~~Dwelling Unit or Recreational Park Trailer established in accordance with CCC 33.51.020 and intended for occupancy of the entire dwelling (not rental of individual rooms) by any person/group other than the primary owner for periods of 30 days or less and is an allowed use in all zoning districts that allow single-family residences. Uninhabitable structures like garages, barns, or sheds, and unpermitted structures, shall not be used as vacation rentals. "Vacation rental" does not include a bed and breakfast permitted and operated in accordance with this code.

Accessory Housing, Ch 33.50, CCC.

CCC 33.50.030: The requirements listed below apply to all accessory housing:

(2) *Structure Type.* Accessory housing units shall must be stick-built or manufactured residential units approved by the Department of Community Development, or the Washington Department of Labor and Industries, as applicable, for permanent occupancy. Accessory housing units shall not includebe travel trailers, recreational vehicles, buses, truck storage containers, or similar manufactured mobile units which are not originally intended to be used for permanent residences. Structures described

~~under WAC 296-150R-0020 as "temporary living quarters" shall not be permitted or placed under the provisions of this section. If such structures are occupied for a period of 90 or more consecutive calendar days in the same location, such occupation shall be considered a violation of this chapter and subject to enforcement under Clallam County Code.~~

(4) *Recording.* To ensure continued compliance with ~~owner occupancy and other~~ ordinance requirements by current, as well as any subsequent owners, a registration of the accessory housing unit in the form of a notice to title shall be filed and recorded with the Clallam County Auditor. The notice to title shall be on a form provided by the Administrator and filled out completely by the applicant prior to filing. The notice to title shall run with the land and serve as notice to all future purchasers/owners of the subject property of the presence of the accessory housing unit and applicable restrictions regarding accessory housing units contained in the Clallam County Code. Proof of registration, in the form of a copy of the filed document, shall be submitted to the Department of Community Development prior to issuance of a certificate of occupancy. Said registration may only be removed upon a demonstration to the Department of Community Development that the accessory housing unit has been lawfully removed from the subject property, or the portion of the subject property containing the accessory housing unit is legally subdivided from the remainder of the property pursuant to CCC Title 29.

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

33.50.040 Additional standards for accessory dwelling units.

(1) Size.

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

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

(3) Occupancy.

(a) In rural zoning districts, the owner of the parcel shall live either in the primary dwelling or ADU as their primary residence. For the purpose of this

standard, "primary residence" shall mean occupancy by the underlying property owner for no less than 120 days during a calendar year.

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

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

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

(a) ~~In rural zoning districts, W~~hen development abuts or is accessed by a county road, all building entrances shall be located so that only one entrance faces the road frontage of the development.

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

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

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

33.51.020 Vacation rental standards.

The dwelling and vacation rental use must comply with all County and State regulations and requirements as well as the following standards:

(2) Connection to a ~~P~~ublic ~~S~~anitary ~~S~~ewer or an ~~O~~n-~~S~~ite ~~S~~eptic ~~S~~ystem ~~T~~hat ~~C~~omplies with Chapter [41.20](#) CCC, On-Site Sewage Systems. If connected to an on-site septic system, the owner is responsible to ensure that the vacation rental occupancy is consistent with the design capacity of the on-site septic system and type of wastewater discharges allowed, and in compliance with on-site septic systems periodic inspection, maintenance, and reporting requirements under CCC [41.20.170](#).

(5) A recreational park trailer, under American National Standards Institute A119.5 standard for Park Model Recreational Vehicles, as defined by WAC 296-150P-0020, and placed in accordance with Chapter 21.06, CCC, may be used as a vacation rental subject to the requirements of this Chapter. It is incumbent on the applicant to demonstrate compliance with applicable requirements of the Washington State Department of Labor and Industries (L&I) and CCC, Chapter 21.06.

General Requirements, Chapter 33.40, CCC

33.40.100 Unauthorized Rental for Use of Structures

(1) The following are prohibited in all zoning districts in Clallam County:

- a) Unpermitted cabins or similar structures being advertised as, or otherwise being offered on, a rental or lease basis.
- b) Tiny Houses on Wheels that do not bear the proper Washington Department of Labor and Industries (L&I) compliance insignia, or that have not been properly placed in accordance with Title 21, CCC, that are being advertised as, or otherwise being offered on, a rental or lease basis.
- c) Any cabins or similar structures that do not meet the requirements of Title 41, CCC, that are being advertised as, or otherwise being offered on, a rental or lease basis.

(2) Any advertisement for the rental or lease of units described under Subsection (1), above, shall be considered prima facie evidence that a violation of the provisions of this Section is occurring.

(3) Any violation of the provisions of this Section shall be enforced in accordance with CCC Section 33.59.010 and CCC Title 20, as applicable.

Recreational Vehicle Placement and Occupancy, Chapter 33.58, CCC

33.58.010 Applicability

The purpose of this chapter is to protect public health, safety, and welfare of Clallam County citizens and the environment by providing standards for citing and occupancy of Recreational Vehicles for personal use on private property. Specifically, this Chapter is not intended to establish regulations on the normal recreational use of Recreational Vehicles but addresses use and occupancy of Recreational Vehicles that extend in duration beyond what is normally considered simple "recreational" use.

33.58.020 General Requirements

The placement of a Recreational Vehicle for a duration of thirty (30) days or more for purposes of occupancy or periodic occupancy shall be subject to the following requirements:

(1) The Recreational Vehicle must maintain current licensing, be in working order, and be movable within two days' notice.

- (2) The Recreational Vehicle must be provided with a stable source of power other than onsite power generators or other sources that introduce noise or other nuisance characteristics, potable water supply, and means of adequate sewage disposal to the satisfaction of the Washington Department of Labor and Industries and the Clallam County Environmental Health Division. Under no circumstances shall gray or black water be discharged onto the ground or surface waters.
- (3) The Recreational Vehicle must be placed outside of structural setbacks applicable to the subject property according to its zoning designation, as well as outside of Critical Areas and their associated buffers in accordance with Chapter 27.12 and Title 35, CCC.
- (4) No more than one (1) Recreational Vehicle may be occupied on a parcel. If more than one Recreational Vehicles are present, each additional Recreational Vehicle shall be stored within a garage or similar structure or otherwise be fully screened from offsite view. For the purposes of this standard, *fully screened* means the Recreational Vehicle is obscured by vegetation or buildings to the extent it is not visible from outside of the property boundary.
- (5) A Recreational Vehicle shall not be occupied for more than 180 days in a 12-month period, except that this time limit may be extended to two consecutive years during home construction on the property on which a valid building permit is currently active and occupancy for the structure has not been granted. This time limit may be extended further subject to building permit extensions as authorized under the Uniform Building Codes.
- (6) A Recreational Vehicle placed in accordance with this Chapter shall not be located in, or encroach upon, any public right-of-way; or be located in, or encroach upon, a private easement in which a separate party holds interest.
- (7) Unlicensed or inoperable Recreational Vehicles are considered Junk Vehicles as defined under CCC 19.60.030(4) and are subject to the enforcement provisions of Chapter 19.60, CCC.

Park Model Placement, Chapter 21.06, CCC

21.06.020 Definition.

- 1) "Recreational Park Trailer" or "Park mModel Recreational Vehicle," "recreational park trailer," or "tiny home on wheels" shall mean a trailer-type unit that has substantially lost its identity as a mobile unit by virtue of its being permanently fixed on property complying with American National Standards Institute A119.5 standard for park trailers as defined by WAC 296-150P-0020. These units shall bear an insignia issued by the Washington Department of Labor and Industries or equivalent. This definition does not include recreational vehicles as defined by

L&I is primarily designed to provide temporary living quarters for recreational, camping or seasonal use, that meets the following criteria:

- a) Built on a single chassis, mounted on wheels; and
- c) Having a gross trailer area not exceeding 400 square feet in the set-up mode; and
- d) Certified by the manufacturer as complying with ANSI A119.5 (WAC 296-150P-0020).

21.06.030 Park model placement requirements.

(1) Applicability. The provisions of this Chapter shall apply to the placement of a Recreational Park Trailer within unincorporated Clallam County. As used in this Chapter, the term "park model" shall apply to, and be considered synonymous with, a Recreational Park Trailer.

~~(21)~~ Placement of a park model ~~(including recreational park trailers, or tiny home on wheels~~ with appropriate L&I insignia or equivalent) within Clallam County requires approval of a placement permit issued by the Clallam County Department of Community Development (DCD).

~~(45)~~ Only one park model may be placed on a legal lot zoned for residential purposes with or without an existing single-family residence, provided compliance with all other criteria specified in this Chapter. Multiple park ~~model trailers~~ may be located on property within an approved ~~b~~Binding ~~S~~ite ~~p~~lan established for the purpose of ~~creating an RV Park~~placing multiple park models.

~~(1) — A park model placed on property with a single-family residence will disqualify the property for an accessory dwelling unit while the park model is present. Likewise, a property containing an accessory dwelling unit is not eligible for the placement of a park model, unless allowed per zoning.~~

Peninsula Daily News

Affidavit of Publication

State of Washington }

County of Clallam/Jefferson } ss

Michael Gates being first duly sworn, upon oath deposes and says: that he/she is the legal representative of the Peninsula Daily News a daily newspaper. The said newspaper is a legal newspaper by order of the superior court in the county in which it is published and is now and has been for more than six months prior to the date of the first publication of the Notice hereinafter referred to, published in the English language continually as a daily newspaper in Clallam/Jefferson County, Washington and is and always has been printed in whole or part in the Peninsula Daily News and is of general circulation in said County, and is a legal newspaper, in accordance with the Chapter 99 of the Laws of 1921, as amended by Chapter 213, Laws of 1941, and approved as a legal newspaper by order of the Superior Court of Clallam/Jefferson County, State of Washington, by order dated June 16, 1941, and that the annexed is a true copy of PDN1013541 HEARING 6/18/25 as it was published in the regular and entire issue of said paper and not as a supplement form thereof for a period of 1 issue(s), such publication commencing on 05/17/2025 and ending on 05/17/2025 and that said newspaper was regularly distributed to its subscribers during all of said period.

The amount of the fee for such publication is \$71.38.

Subscribed and sworn before me on this

19th day of May,
2025.

Randie P

Notary Public in and for the State of Washington.

CLCO COMMUNITY DEV - LEGAL ADS | 48140985
DONELLA CLARK



NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN, pursuant to RCW 36.70.580, that the Clallam County Planning Commission (PC) has scheduled a public hearing for **Wednesday, June 18, 2025, at 6:00 p.m.** in Room 160 of the Clallam County Courthouse, 223 East Fourth Street, Port Angeles, WA 98362 or by Zoom.

The purpose of the hearing is to receive public testimony on the adoption of amendments to the Clallam County development regulations regarding Recreational Vehicles. The proposed changes include definitions within the zoning code, language within the Accessory Housing regulations, Vacation rental standards, and general requirements for the placement of RVs on property. The proposed changes will also amend the section related to Park Model Placement in Chapter 21.06.

State Environmental Policy Act (SEPA): Clallam County is the lead agency for this proposal. Clallam County issued a Determination of Non-Significance (DNS) on May 12, 2025 for a non-project action and has determined that the proposed amendments to the Development Regulations would not result in a probable significant adverse impact on the environment.

Comments & Additional Information: Any interested person or party may submit written or oral comments on the proposal. Comments can be submitted at the public hearing or in advance of the public hearing. Upon completion of the public hearing process, the Planning Commission will forward its recommendations to the Board of Clallam County Commissioners for its consideration and further action. For more information view the Planning Commission Agenda for June 18, 2025. You can also visit DCD office at 223 E. 4th St., Suite 5, Port Angeles, WA 98362, Monday through Friday, between 8:00 a.m. - 4:30 p.m. or contact Donella Clark, at (360) 417-2594, or by email at donella.clark@clallamcountywa.gov if you have any questions or comments.

PDN.: May 17, 2025

Legal No. 1013541

**State Environmental Policy Act (SEPA) WAC 197-11
DETERMINATION OF NON-SIGNIFICANCE**

Proposal: Amendments to Development regulations in order to address use of Recreational Vehicles

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

NOTICE IS HEREBY GIVEN, pursuant to RCW 36.70.580, that the Clallam County Planning Commission (PC) has scheduled a public hearing for Wednesday, June 18, 2025, at 6:00 p.m. in Room 160 of the Clallam County Courthouse, 223 East Fourth Street, Port Angeles, WA 98362.

The purpose of the hearing is to receive public testimony on the adoption of the changes to the development regulations that address Recreational Vehicles. The proposal changes definitions within the zoning code, touches language within the Accessory Housing regulations, Vacation rental standards, and general requirements. The proposed changes will also amend the section related to Park Model Placement in Chapter 21.06. Interested parties are invited to attend the public hearing(s) and make their views known to the Planning Commission.

Any interested person or party may submit written or oral comments on the proposal. Comments can be submitted at the public hearing or in advance of the public hearing. Upon completion of the public hearing process, the Planning Commission will forward its recommendations to the Board of Clallam County Commissioners for its consideration and further action. For more information consult the Planning Commission Agenda for the November 1st meeting. You can also visit our offices at 223 E. 4th St., Suite 5, Port Angeles, WA 98362, Monday through Friday, between 8:00 a.m. - 4:30 p.m. Please contact Donella Clark, project planner at (360) 417-2594, or by email at donella.clark@clallamcountywa.gov if you have any questions or comments.

Description of Proposal: The proposed standards will change definitions regarding Recreational Vehicles, update Accessory Housing regulations, vacation rental standards, and language in the general requirements section of the development code that will require conditions for RVs to be placed on property.

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

SEPA: 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 pertaining to mineral lands, and other information on file with Clallam County.

This Determination of Non-Significance (DNS) for this non-project action is issued

May 12, 2025 under WAC 197-11-340(2).

Comments on this DNS must be submitted by ^{May 27}~~May 9~~, 2025.

Signature:



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

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 Development Regulations pertaining to Recreational Uses. Contact the Responsible Official for SEPA appeal procedures.

SEPA 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.

A. Background Find help answering background questions

1. **Name of proposed project, if applicable:**
2. **Name of applicant:** Clallam County
3. **Address and phone number of applicant and contact person:** Donella Clark, Project Planner, 223 E 4th St Clallam County Courthouse Suite 5, Port Angeles, WA 98362
donella.clark@clallamcountywa.gov, 360-417-2594
4. **Date checklist prepared:** May 9, 2025
5. **Agency requesting checklist:** Clallam County
6. **Proposed timing or schedule (including phasing, if applicable):** Planning Commission Public Hearing scheduled for June 18, 2025, with a vote on a recommendation to the Board of County Commissioners and public hearing to follow.
7. **Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.** Clallam County is undergoing their Comprehensive Update which may require additional development standards to be updated in the future.
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, Zoning Ordinance Title 33 adopted by Ordinance 581 on December 19, 1995 and amendments.
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.** None.
11. **Give a 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.)** This is a non-project action amending zoning regulations related to Recreational Vehicle uses. The proposal changes definitions within the zoning code, touches language within the Accessory Housing regulations, Vacation rental standards, and general requirements. The proposed changes will also amend the section related to Park Model Placement in Chapter 21.06.

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 will affect residential use of Recreational Vehicles and will apply throughout all the unincorporated areas in Clallam County.

B. Environmental Elements

1. Earth Find help answering earth questions

- a. **General description of the site:** This proposal is a non-project action that will apply to all areas of the unincorporated County.

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other: All.

- b. **What is the steepest slope on the site (approximate percent slope)?** Any. The development regulations encompass all of unincorporated Clallam County.
- 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. This is a non-project action so this is not applicable.
- 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.** This is a non-project action so this is not applicable.
- f. **Could erosion occur because of clearing, construction, or use?** If so, generally describe. This is a non-project action and is not applicable.
- 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.
- h. **Proposed measures to reduce or control erosion, or other impacts to the earth, if any.** This is a non-project action so this is not applicable.

2. Air Find help answering air questions

- 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 and give approximate quantities if known. This is a non-project action regarding the use of Recreational Vehicles.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. There is nothing that would indicate an effect.

c. Proposed measures to reduce or control emissions or other impacts to air, if any. There will be no permanent emissions created by this non-project action.

3. Water [Find help answering water questions](#)

a. Surface Water: [Find help answering surface water questions](#)

- 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. This is a non-project action so this is not applicable.**
- 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. Site specific development will be reviewed in the context of the County's development and Critical Area regulations and is not applicable to this non-project action.**
- 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. None.**
- 4. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known. No.**
- 5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. This is a non-project action, site specific information is not required until placement is proposed.**
- 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. No. This proposal includes ensuring that recreational uses do not discharge waste.**

b. Ground Water: [Find help answering ground water questions](#)

- 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. This is a non-project action so this is not applicable.**
- 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.

The new code is intended to require a legal connection to a septic system or sewer if RV is intended to be occupied for a duration of 30 days.

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.** Site specific development will be reviewed for compliance with Clallam County Codes. This non-project action will not affect these.
- 2. Could waste materials enter ground or surface waters? If so, generally describe.** No.
- 3. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.** This is a non-project action.
- 4. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any.** This is a non-project action.

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.
- c. List threatened and endangered species known to be on or near the site.** There may be ESA listed species located within Clallam County, but will not be directly effected by this non-project area.
- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.** None.
- e. List all noxious weeds and invasive species known to be on or near the site.** There could be all types of noxious weeds on sites located within this non-project action.

5. Animals [Find help answering animal questions](#)

- 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 controlled under this non-action project.

Examples include:

- Birds: hawk, heron, eagle, songbirds, other:
- Mammals: deer, bear, elk, beaver, other:
- Fish: bass, salmon, trout, herring, shellfish, other:

- b. List any threatened and endangered species known to be on or near the site. There may be all ESA listed species in this non-action project area.
- c. Is the site part of a migration route? If so, explain. The area within this non-project action may be a migration route.
- d. Proposed measures to preserve or enhance wildlife, if any. None specified per this non-project action.
- e. List any invasive animal species known to be on or near the site. There may be all types listed in this non-project area.

6. Energy and Natural Resources [Find help answering energy and natural resource questions](#)

- 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. This is a non-project action and does not apply.
- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. No.
- 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. None.

7. Environmental Health [Find help with answering environmental health questions](#)

- 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. No.

1. Describe any known or possible contamination at the site from present or past uses. This is a non-project action and not site specific.

- a. 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.
- b. 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.

- c. **Describe special emergency services that might be required.** None.
- d. **Proposed measures to reduce or control environmental health hazards, if any.**
None.

b. Noise

- 1. **What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?** This is a non-project action so there is no site specific information.
- 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.
- 3. **Proposed measures to reduce or control noise impacts, if any.** None.

8. Land and Shoreline Use [Find help answering land and shoreline use questions](#)

- 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 so there is no site specific information until a project is proposed.
- 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?** This is a non-project action so this is not applicable.
- 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?** This is a non-project action so this is not applicable.
- d. **Describe any structures on the site.** Not applicable to this non-project action.
- e. **Will any structures be demolished? If so, what?** Review of site specific improvements will occur at the project stage.
- f. **What is the current zoning classification of the site?** This is a non-project action and review of zoning classifications will be complete at time of development.
- g. **What is the current comprehensive plan designation of the site?** This is a non-project action and will apply to all Comprehensive Plan designations throughout unincorporated Clallam County.
- h. **If applicable, what is the current shoreline master program designation of the site?** This is a non-project action and there is no site specific information.

- i. **Has any part of the site been classified as a critical area by the city or county? If so, specify.** This is a non-project action and there is no site specific information.
- j. **Approximately how many people would reside or work in the completed project?** This is not applicable for this non-project action.
- k. **Approximately how many people would the completed project displace?** None.
- l. **Proposed measures to avoid or reduce displacement impacts, if any.** None.
- m. **Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.** This is a non-project action and there is no site specific information.
- n. **Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any.** This is a non-project action and there is no site specific information.

9. Housing [Find help answering housing questions](#)

- a. **Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.** None. This proposal is not intended to address affordable housing or homeless issues, but provides better standards for those individuals who want to occupy recreational vehicles for short or longer durations throughout the county.
- b. **Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.** None.
- c. **Proposed measures to reduce or control housing impacts, if any.** None.

10. Aesthetics [Find help answering aesthetics questions](#)

- 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 there is no site specific information.
- b. **What views in the immediate vicinity would be altered or obstructed?** This is a non-project action and there is no site specific information.
- c. **Proposed measures to reduce or control aesthetic impacts, if any.** This is a non-project action and there is no site specific information.

11. Light and Glare [Find help answering light and glare questions](#)

- a. **What type of light or glare will the proposal produce? What time of day would it mainly occur?** This is a non-project action and there is no site specific information.
- b. **Could light or glare from the finished project be a safety hazard or interfere with views?** No.
- c. **What existing off-site sources of light or glare may affect your proposal?** This is a non-project action and there is no site specific information.

- d. **Proposed measures to reduce or control light and glare impacts, if any.** None.

12. Recreation [Find help answering recreation questions](#)

- a. **What designated and informal recreational opportunities are in the immediate vicinity?**
This is a non-project action and there is no site specific information.
- b. **Would the proposed project displace any existing recreational uses? If so, describe.** This is a non-project action and there is no site specific information.
- c. **Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any.** None.

13. Historic and Cultural Preservation [Find help answering historic and cultural preservation questions](#)

- 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.** This is a non-project action and there is no site specific information.
- 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.** Review of the specific placement will ensure historical features are protected.
- 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.** This is a non-project action and there is no site specific information.
- 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.** None associated with the proposed Ordinance.

14. Transportation [Find help with answering transportation questions](#)

- 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.** This is a non-project action and there is no site specific information.
- 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?** This is a non-project action and there is no site specific information.
- 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).** This is a non-project action.

- d. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. No.
- 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? None.
- 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. No.
- g. Proposed measures to reduce or control transportation impacts, if any. None.

15. Public Services [Find help answering public service questions](#)

- 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. This is a non-project action that affects timelines for processing permits.
- b. Proposed measures to reduce or control direct impacts on public services, if any. None.

16. Utilities [Find help answering utilities questions](#)

- a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other: This is a non-project action and there is no site specific information.
- 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. This is a non-project action and there is no site specific information.

C. Signature [Find help about who should sign](#)

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.

Signature: _____



Name of signee: Donella Clark

Position and Agency/Organization: Clallam County Principal Planner

Date Submitted: May 9, 2025

D. Supplemental sheet for nonproject actions [Find help for the nonproject actions worksheet](#)

IT IS NOT REQUIRED to 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? It will not.**
 - **Proposed measures to avoid or reduce such increases are:** This should reduce the amount of waste being discharged into the environment by requiring connection to approved septic or sewer.
- 2. How would the proposal be likely to affect plants, animals, fish, or marine life? The amendment to our development regulation will have no affect.**
 - **Proposed measures to protect or conserve plants, animals, fish, or marine life are:** Nothing proposed.
- 3. How would the proposal be likely to deplete energy or natural resources? The proposed regulations would not deplete energy or natural resources.**
 - **Proposed measures to protect or conserve energy and natural resources are:** Nothing proposed.
- 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 amendment will not affect these areas.**
 - **Proposed measures to protect such resources or to avoid or reduce impacts are:** This proposal provides more specific regulations for recreational use. This should make the enforcement of this regulation easier to implement.
- 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 amendments will not.**

- **Proposed measures to avoid or reduce shoreline and land use impacts are:** Nothing proposed.

6. **How would the proposal be likely to increase demands on transportation or public services and utilities?** Utilities will likely be associated with the land use proposals but not affected by this ordinance.

- **Proposed measures to reduce or respond to such demand(s) are:** None.

7. **Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.** The intent of the amendments regarding recreational vehicles is intended to decrease the impacts the placement of RVs on residential property.



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: June 10, 2025
To: Clallam County Planning Commission
From: Bruce Emery, Director of Community Development
Re: Land Capacity Analysis

Discussion

The Land Capacity Analysis (LCA) meets the County's obligation for evaluating the ability of existing zoning to accommodate future growth in accordance with RCW 36.70A.070(2)(c). As a brief summary, the LCA considers the adequacy of existing zoning to accommodate housing needs for those in the extremely low-income bracket (0 – 30% Area Median Income (AMI)), very low-income bracket (>30% to 50% AMI), low-income bracket (>50% to 80% AMI), moderate-income bracket (> 80% to 120% AMI), and above (> 120% AMI). The LCA also considers the adequacy of existing zoning to accommodate emergency housing shelters, and to accommodate projected employment needs.

There are several requirements reflected in RCW 36.70A.070(2)(c), that were not required in prior periodic updates, including the breakdown of housing needs by income segment, accommodating emergency housing, and accommodating future employment needs. I worked closely with our consultant team and reviewed several other jurisdictions' LCAs in developing this Draft. The enclosed LCA explains each parameter reviewed and the methodology used to arrive at its conclusions. The conclusions of the report are summarized at the end (pages 26-27).

It should be noted that while this report identifies current capacities and deficiencies, it should not be considered the final word on housing or economic policy. For example, although the report identifies, based on current trends, the capacity needed in commercial and industrial zones to accommodate future job needs, it does not analyze whether those jobs will be high-prosperity, family-wage jobs or simply minimum wage. This information is a starting point for the housing and economic development elements of our Comprehensive Plan update, not its conclusion.

I look forward to reviewing this information with you during our work session. If you have any questions regarding this information, please contact me at 360-417-2323 or at bruce.emery@clallamcountywa.gov. Thank you for your consideration on this matter.

Sincerely,

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

Bruce Emery, Director
Clallam County DCD

Clallam County Comprehensive Plan

Land Capacity Analysis

May 30, 2025, Draft

Introduction

Clallam County is conducting a periodic update of its Comprehensive Plan in accordance with the Washington State Growth Management Act (GMA). As part of the update review, the County is required to ensure the Plan and subsequent development regulations "...provide sufficient capacity of land suitable for development within their jurisdictions to accommodate their allocated housing and employment growth (RCW 36.70A.115)." This Land Capacity Analysis (LCA) represents an integral step in completing the periodic update by analyzing the current development condition of unincorporated Urban Growth Areas (UGAs) and the rural areas of Clallam County, evaluating the capacity that exists with vacant parcels, under-utilized parcels and parcels with further development potential. A series of assumptions are then applied to this information to account for barriers to future growth that will likely reduce the number of parcels and areas that will experience growth over the next 20-year planning horizon.

In accordance with RCW 36.70A.070(2)(c), the County is required to ensure housing capacity for all income segments. Specifically, the Act requires the County to analyze growth capacity against zoning requirements to ensure adequate room for growth in the following income segments based on Area Median Income (AMI):

- **Extremely low-income:** 0-30% of AMI (includes permanent supportive housing and emergency shelters)
- **Very low-income:** >30-50% of AMI
- **Low-income:** >50-80% of AMI, and
- **Moderate Income:** >80-120% of AMI

This report analyzes parcel data obtained from Clallam County Assessor's records under a GIS format that queries the information based on zoning district and whether the properties exist within an unincorporated UGA or one of the rural or resource zoning districts in unincorporated Clallam County. At the time of this report, the data was shown to include a 7% probability of error factor. Since each incorporated city within Clallam County is also required to perform their own LCA, this report is limited in scope to unincorporated areas of Clallam County.

Population and Housing Forecast

As a precursor to this analysis and in accordance with RCW 36.70A.070(2) and WAC 396-196-325, Clallam County adopted housing allocations for the 20-year planning

horizon (see Appendix A, Resolution 101, 2024). The allocations included projected housing needs for the incorporated cities of Sequim, Port Angeles, and Forks; the unincorporated UGAs of Sequim, Carlsborg, Port Angeles, Joyce, Clallam Bay/Seki, and Forks; and unincorporated rural Clallam County. These allocations were based on the countywide population projections provided by the Washington Office of Financial Management, medium population projection. With the assistance of the Housing for All Planning Tool (HAPT), Method C, as provided by the Washington Department of Commerce, the allocations were further divided into the number of housing units required for each income segment specified under RCW 36.70A.070(2). The adopted allocations are summarized in Table 1, below.

Table 1: Clallam County 2045 Housing Allocations

	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

(* PSH: Permanent Supportive Housing)

With an estimated population of 86,700 people by 2045, Clallam County is expected to grow by 9,545 people since the last Census was completed for Clallam County in 2020, with a total expanded housing need of an additional 6,408 units. In conducting the housing allocation exercise, planning staff from the County and the three cities came to consensus on how the projected growth and related housing needs should be allocated across Clallam County. This discussion included consideration of past growth trends, local conditions and community preferences within each jurisdiction.

As a function of population, the above housing allocations were based on the projected population growth for Clallam County. The 2020 Census data showed a total population

of 77,155 people in Clallam County at that time¹. Although the population of Clallam County has been projected to include 78,550 people as of June 2024, the above HAPT Method C housing projections were based on the 2020 Census data, making it important to maintain the same projection period of 2020 to 2045. Based on this analysis, the population growth allocation for Clallam County is provided in Table 2, below.

Table 2: Clallam County 2020 to 2045 Population Growth Allocations

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

It is important to note that these allocations represent consideration of past development trends, but also preferences of the participating cities and the County as to where future growth should occur. In reality, growth will be driven heavily by market factors, availability of infrastructure, economic circumstances, and a host of other factors that will contribute to the rate and form that new development will take. What this information does show are the areas that development is likely to occur, and to form the basis for the remainder of this analysis, which is to evaluate current zoning's ability to accommodate this projected growth, or whether changes are needed in order to meet future demand.

Methodology

The process of determining growth capacity involves establishing a reliable inventory of existing development and ascertaining what remains in terms of vacant parcels,

¹ Population of Cities, Towns and Counties, Office of Financial Management, June 5, 2024

additional capacity within existing parcels, and additional capacity of under-utilized parcels. Clallam County's Information Technology Department (IT) assembled a link between the Clallam County Assessor's parcel database and IT's Geographic Information System (GIS). The information linked the extensive parcel database with the geospatial capabilities of GIS, enabling the query of parcel information by location and zone. This allowed for the development capacity of vacant and underdeveloped parcels to be determined. For example, the Rural Low (R5) zone has a maximum residential density of one home for every 4.8 acres. A vacant R5 parcel possessing 9.6 acres would be shown to have a capacity of two residential units ($9.6 / 4.8 = 2$). Similarly, if that same parcel already contained a home, the capacity would be shown to be one residential unit.

In addition to querying for the right parcels to consider, it was necessary to omit parcels that are not available for development. The assumptions included omitting the following:

- Developed parcels without additional capacity.
- All parcels that exist outside of Clallam County's jurisdiction (e.g. cities, Olympic National Park, etc.).
- All parcels coded as public rights-of-way, common areas, tidelands and water.
- All parcels with public ownership such as parks, public facilities, or other federal, state, county or city ownerships.
- All parcels under 4,000 square feet and within a UGA and all parcels under 12,500 square feet outside of a UGA.

Concerning the latter, it was assumed that a parcel under 4,000 square feet is not feasibly buildable due to setbacks, infrastructure needs and other limiting factors. Similarly, a parcel less than 12,500 square feet in a rural area, where a septic system and well is typically required, is not considered to have sufficient area to accommodate residential development. It should be noted this LCA does not take into consideration all potential prohibiting and/or limiting factors of growth, which can include lack of infrastructure, utilities and access in areas of the City. Such issues will be addressed in appropriate chapters of the Comprehensive Plan.

The data was queried from the joined database and filtered according to the parameters described above. Additional deductions also had to be applied to account for the presence of critical areas. Critical areas include areas of environmental concern, such as wetlands, stream corridors, critical aquifer recharge areas (CARAs), and geologically hazardous areas. While not all critical areas preempt development, landslide hazard areas, water bodies (streams, ponds) and wetlands all include regulations prohibiting development within the critical area or its buffer. Although a range of buffer widths may apply depending on the type of critical area and its ranking, a standard 50-foot buffer was applied for the purpose of this review. This accounts for the fact that an owner may receive approval for buffer averaging, and the fact that the flexible zoning allowed in Clallam County is based on a gross residential density rather than a minimum lot size standard. The assumption is that more development may be accommodated through

these two regulatory features than is otherwise implied by the range of critical area buffers.

Since the GIS parcel layer and critical area layer do not have boundaries that coincide, it was not feasible to join them in a query-able layer. Rather, the acreage of all critical areas along with a standardized 50-foot buffer was obtained for each focus area (each unincorporated UGA and rural Clallam County). The resulting acreage was used as a percentage of the over-all focus area and applied as a reduction.

Another deduction that should be considered is the fact that not everything that can be developed will be developed. Personal preference, general development challenges, economics, and a host of other factors contribute to whether a property will truly see development during the 20-year planning horizon. In accordance with WAC 365-196-310(4)(d)(F), a market factor that accounts for this variable may be applied to the capacity assessment of potentially developable parcels. The Washington Department of Commerce suggests a market factor of 15% for vacant parcels and 25% for built parcels with development or redevelopment capacity.² These percentages have been applied to development within designated UGAs. However, in rural Clallam County, the development challenges are more substantial, including provision of a septic system and private well. With these added costs and complexities, a market factor of 40% has been applied to parcels outside of designated UGAs.

Housing Types and Affordability by Income Bracket

As recommended by the Department of Commerce, demonstrating sufficient development capacity includes: 1) summarizing land capacity by zone, 2) categorizing zones by allowed housing types and density levels, 3) relating zone categories to potential income levels and housing types served, 4) summarizing capacity by zone category, and 5) comparing projected housing needs to capacity. In the event a deficit in development capacity is found to exist, the County is to consider changes to zoning to address the issue, then re-assess capacity based on the actions taken.

The organization of this report will address each item recommended by Commerce, but in an adjusted order for clarity. Because Clallam County is for the most part a rural community, the range of housing types available in more urbanized areas of Washington State is not readily available. Even in the established urban areas of Port Angeles and Sequim, a three or four-story building is the exception.

Because of this, fewer options exist for the types of housing most suited for meeting extremely low and very low-income segments. Typically, multi-family apartments and similar higher-density developments are needed to create the economies of scale necessary for subsidized and low-income housing. However, flexible zoning allowing for the clustering of residential units combined with comparatively higher densities can still create opportunities for this and other income segment-appropriate housing. With this

² Guidance for Updating Your Housing Element, V. 3.4, Washington Department of Commerce, Sept. 2024.

understanding, Table 3 (below) relates zoning categories to available housing types within those categories and the potential affordability range such units may produce.

Table 3: Relating Zoning and Housing Type to Income Bracket Affordability

Zone Category	Housing Types Allowed	Density Range	Lowest Potential Income Level Served		Assumed Affordability Level for Capacity Analysis
			Market Rate	With Subsidies and/or Incentives	
Rural Density	Detached Single Family Dwellings (SFD)	1 unit/acre and less	Higher Income (>120% AMI)	Not Feasible at Scale	Higher Income (>120% AMI)
Low Density	SFD/Duplexes	2-4 units/acre	Higher Income (>120% AMI)	Not Typically Feasible at Scale	Higher Income (>120% AMI)
Moderate Density	Duplexes/triplexes/small scale multi-family	5-9 units/acre	Moderate Income (>80-120% AMI)	Low to Moderate Income (>50-120% AMI)	Low and Moderate Income (>50-120% AMI)
High Density	Multi-family	10 units/acre and more	Low Income (>50-80% AMI)	Extremely low to Low-income (0-80% AMI)	Low Income (0-80% AMI) and PSH
ADUs (all Res. Zones)	Accessory dwelling units on developed residential lots	N/A	Moderate Income (>50-120% AMI)	N/A	Moderate Income (>50-120% AMI)

The information contained in Table 3 establishes the general zone categories based on density and the types of housing allowed within similar zoning districts. The types of housing allowed within these broader zone categories are critical to analyzing the County's ability to accommodate housing needs for all income segments. The table makes clear that accommodating the lower income segments (0-50% AMI) requires at least high-density zones. As discussed earlier, the economies of scale afforded in the high-density category provides the minimum parameters necessary for low-income and supplemental housing to be feasible.

Accessory Dwelling Units. It is important to recognize the role that Accessory Dwelling Units (ADUs) play in helping the County meet its housing goals. As noted in Table 3, ADUs provide opportunity for housing within the 50% to 120% AMI range, similar to the moderate-density category. While most stick-built ADUs might command rents at the upper end of this range (and possibly beyond), Modular, Manufactured homes, and tiny homes on wheels constructed and placed in accordance with State Building Code standards are also available options as ADUs that provide more affordability for this housing alternative.

Permit records for the past 20 years show a trend of approximately 15 ADUs constructed annually in unincorporated Clallam County. When related to residential building permits, ADUs track around 8.1% of the volume of new residential units.

Historic development patterns in unincorporated UGAs mostly include larger parcels at lower densities. With the exception of the Sequim UGA, most of the current parcels within the County's UGAs were created prior to the 1990's and homeowner associations and restrictive CC&Rs. The newer developments in Sequim are offset by a strong real estate market in that part of the County. These facts suggest there exists a high percentage of lots with capacity to accommodate ADU development. With increased opportunities in UGAs and demand for new rentals at a historic high, it can be assumed that new ADU construction will, at a minimum, continue at their current pace. It is expected that the average rate of 8.1% for new ADUs to new home construction will

continue for the 20-year planning horizon. With these assumptions, ADU development capacity is estimated in Table 4, below.

Table 4: ADU Development Capacity and Expected Growth

Jurisdiction	Total Housing Allocation	Estimated ADU Growth
Sequim UGA	298	24
Carlsborg UGA	179	14
Port Angeles UGA	298	24
Joyce UGA	0	0
Clallam Bay/Sekiu UGA	30	2
Forks UGA	30	2
Rural County	1014	<u>82</u>
Total Anticipated ADUs:		<u>150</u>

Capacity Estimates by UGAs

The following section provides the capacity analysis for each unincorporated UGA within Clallam County as well as rural and resource areas of the County outside of UGAs. The information is presented in two interrelated tables. The first table distills the net available capacity for the zone categories within the focus area. The second table compares the net capacity to the allocated need for the focus area established in the Housing Allocation for Clallam County (Appendix A). This information reveals whether planned growth can be accommodated within existing zoning districts, or if adjustments are required in order to meet future housing needs.

Sequim Urban Growth Area (UGA). The Sequim UGA covers approximately 1,153 acres of unincorporated urban area abutting the incorporated boundaries of the City of Sequim. Zoning for the area is predominantly moderate density with some discrete areas (approx. 64 acres) of high-density. Also included are approximately 95 acres of *Sequim Research and Development* (S(RDP)), a zone established for research and development-style industrial campuses and facilities. Net capacity for the residential zone categories present is shown in Table 5-A, below.

Table 5-A: Net Residential Capacity for Sequim UGA

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (12.6%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category				
		Units	Acres	Units	Acres	Units	Acres		Units	Acres			
S(R-II)	Vacant	988	287.0	864	250.8	734	213.2	Moderate Density	1,938	607.8			
	Partial use	1800	602.0	1573	526.1	1180	394.6						
S(R-III)	Vacant	64	17.6	56	15.4	48	13.1	High Density	89	30.3			
	Partial use	18	11.0	16	9.6	12	7.2						
S(R-IV)	Vacant	10	2.2	9	1.9	7	1.6						
	Partial use	34	12.8	30	11.2	22	8.4						
ADU Capacity (based on Table 4. Units added to Moderate Density)						24							
Total Gross Residential Capacity:									2,027	638.1			

The information in Table 5-A demonstrates a growth capacity of 1,938 additional units within the moderate-density category, and 89 units in the high-density category. Available acreage in these categories include 607.8 and 30.3, respectively, for a total capacity of 2,027 units over 638.1 acres. A comparison of this capacity to the future housing needs by income segment is shown in Table 5-B, below.

Table 5-B: Housing Capacity Compared to Housing Needs for Sequim UGA

Housing Capacity Compared to Housing Needs for Equim OGA					
Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone Categories Serving Need Level	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0-30% Non PSH	100				
0-30% Non	45	High Density	236	89	-147
>30-50%	91				
>50-80%	37				
>80-100%	13	Moderate Density	60	1,938	1,876
>100-120%	10				
>120%	2	Low Density	2	Accommodated Above	↑

The needs of a lower-density housing segment can be accommodated in a higher-density category. As shown in Table 5-B, a need of two additional units exist within the low-density category. However, all residential zoning within the UGA is either Moderate or high-density. Since all residential zones do allow all residential dwelling types found in the low-density category, those needs can be accommodated in a higher-density category. Unfortunately, the reverse does not apply.

In accordance with guidance provided by the Department of Commerce, this analysis assumes maximum residential densities allowed within the specific zoning districts. However, it must be noted that the S(R-II), S(R-III), and S(R-IV) zones all have a base density of four units per acre. To achieve the higher densities used in this analysis,

Clallam County Code requires acquisition of additional development rights through the Transfer of Development Rights (TDR) program set forth under Chapter 33.26, CCC. The TDR program is intended to allow for the transfer of existing development potential within the Agricultural Retention (AR) Zone to any of the receiving zones located within the Sequim UGA. However, since its inception in July of 1998, not one transfer of development rights has occurred in Clallam County. Unless the TDR Program can be modified to be more economically attractive, it is not working as an effective protection of agricultural lands but is acting to impede development of new housing stock within the UGA.

Carlsborg Urban Growth Area (UGA). The Carlsborg UGA includes approximately 559 acres of unincorporated urban area located west of Sequim aligning roughly with Carlsborg Road and SR 101. The UGA does not abut an incorporated city. It relies on Public Utility District #1 of Clallam County (PUD#1) for power and the majority of its water supply, and the City of Sequim, through interlocal agreement, for sewage collection and disposal. Zoning for the area includes a mix of regional and local commercial, a range of moderate and high-density residential, and an industrial park of approximately 81 acres in area. Two of the three commercial zones (CC and CN) allow for high-density residential uses mixed with commercial uses. Net capacity for the zone categories present is shown in Table 6-A, below.

Table 6-A: Net Residential Capacity for Carlsborg UGA

Table 3-11: Net Residential Capacity for Various Zoning Districts													
Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (3.3%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category				
		Units	Acres	Units	Acres	Units	Acres		Units	Acres			
CR-I	Vacant	19	10.5	18	10.2	16	8.6	Moderate Density	367	69.9			
	Partial use	117	34.8	113	33.7	85	25.2						
CR-II	Vacant	35	4.3	34	4.2	29	3.5						
	Partial use	309	44.8	299	43.3	224	32.5						
CR-III	Vacant	364	38.6	352	37.3	299	31.7	High Density	579	61.6			
	Partial use	269	27.8	260	26.9	195	20.2						
CC *	Vacant	0	0.0	0	0.0	0	0.0						
	Partial use	61	6.9	59	6.7	45	5.0						
CN *	Vacant	26	2.5	25	2.4	21	2.1						
	Partial use	27	3.6	26	3.5	19	2.6						
ADU Capacity (based on Table 4. Units added to Moderate Density)						14							
Total Gross Residential Capacity:									947	131.5			

(*Mixed-use Zones Assume 33% residential, 67% Commercial.)

The information in Table 6-A demonstrates a growth capacity of 367 additional units within the moderate-density category, and 579 units in the high-density category. Available acreage in these categories include 69.9 acres for moderate-density and 61.6 acres for high-density. Total capacity is shown to include 947 units over 131.5 acres. A comparison of this capacity to the future housing needs by income segment is shown in Table 6-B, below.

Table 6-B: Housing Capacity Compared to Housing Needs for Carlsborg UGA

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone Categories Serving Need Level	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0-30% Non PSH	60				
0-30% Non	27	High Density	142	579	437
>30-50%	55				
>50-80%	22				
>80-100%	8	Moderate Density	36	367	330
>100-120%	6				
>120%	1	Low Density	1	Accommodated Above ↑	

Again, the needs shown within the low-density category can be accommodated in the moderate-density category. Table 6-B indicates a surplus of housing capacity of 330 units for moderate-density, and 437 units for high-density categories. These suggest that current zoning is adequate to meet the housing needs of all income segments over the 20-year planning horizon.

Port Angeles Urban Growth Area (UGA). The Port Angeles UGA covers approximately 2,315 acres of unincorporated urban area abutting the City of Port Angeles. Zoning for the area ranges from low to high-density integrated with neighborhood and regional commercial uses. Also included is approximately 163 acres of *Industrial (M)* zoning, which allows for manufacturing and materials processing. Net residential capacity for the zone categories present is shown in Table 7-A, below.

Table 7-A: Net Residential Capacity for Port Angeles UGA

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (17.5%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
VLD	Vacant	229	116.9	189	96.4	161	81.98	Low Density	775	475.2
	Partial use	243	180.0	200	148.5	150	111.4			
VLD/LD	Vacant	324	161.5	267	133.2	227	113.3			
	Partial use	383	272.5	316	224.813	237	168.6			
LD	Vacant	764	121.7	630.3	100.4	536	85.34	Moderate Density	1,715	243.5
	Partial use	1867	255.6	1540.3	210.9	1155	158.2			
MD	Vacant	429	52.7	354	43.5	301	37.0	High Density	1,520	140.4
	Partial use	1621	131.5	1337.3	108.488	1003	81.4			
URC *	Vacant	173	20.6	143	17.0	121	14.4			
	Partial use	153	12.3	126	10.2	95	7.6			
ADU Capacity (based on Table 4. Units added to Moderate Density)						24				
Total Gross Residential Capacity:									4,010	859.1

(* Mixed-use Zones Assume 33% residential, 67% Commercial.)

The information in Table 7-A demonstrates a growth capacity of 775 additional units within the low-density category, 1,715 units in the moderate-density category, and 1,520 units in the high-density category. Available acreage in these categories include 475.2, 243.5, and 140.4, respectively, for a total capacity of 4,010 units over 859.1 acres. A comparison of this capacity to the future housing needs by income segment is shown in Table 7-B, below.

Table 7-B: Housing Capacity Compared to Housing Needs for Port Angeles UGA

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone Categories Serving Need Level	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0-30% Non PSH	100				
0-30% PSH	45	High Density	236	1,520	1,284
>30-50%	91				
>50-80%	37				
>80-100%	13	Moderate Density	60	1,715	1,655
>100-120%	10				
>120%	2	Low Density	2	775	773

The information in Table 7-B demonstrates that existing capacity within the current zoning districts is adequate to meet the housing needs of all income segments over the 20-year planning horizon.

Joyce Urban Growth Area (UGA). The Joyce UGA covers an area of approximately 353 acres of unincorporated urban area located west of Port Angeles along the SR112 corridor. The UGA does not abut an incorporated city. It relies on PUD #1 of Clallam County for power and Crescent Water System for potable water supply. There is currently no public sewer system available and sewage disposal is typically handled through individual on-site septic systems.

Although the Joyce UGA is characterized by historic urban development that existed prior to the passage of the GMA, it has experienced a decline in population in the past decade. This, coupled with limited urban services, renders the UGA limited in its ability and likelihood of seeing significant growth over the 20-year planning horizon.

Zoning for the UGA includes two districts: Urban Center (UC) and Urban Residential High Density (URH). Despite its name, the URH Zone allows only a maximum density of one unit per 12,500 SF (less than 4 units per acre), making it part of the low-density zone category. In contrast, the UC Zone is a mixed-use zone that allows residential densities up to one unit per 7,000 SF, or roughly 6.2 dwellings per acre. As with all mixed-use zoning districts in this analysis, an assumption of 33% development with residential use is used.

In considering the limited urban services and the recent population decline, the UGA was not assigned growth in the allocation process. However, capacity still exists within the UGA. Net capacity for the zone categories present is shown in Table 8, below.

Table 8: Net Residential Capacity for Joyce UGA

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (23.5%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
URH	Vacant	34	16.7	26	12.8	22	10.9	Low Density	134	47.1
	Partial use	195	63.1	149	48.3	112	36.2			
UC *	Vacant	124	24.9	95	19.1	81	16.2	Moderate Density	250	44.8
	Partial use	294.0	49.8	225	38.1	169	28.6			
ADU Capacity (based on Table 4. Units added to Moderate Density)						0				
Total Gross Residential Capacity:									384	91.9

(* Mixed-use Zones Assume 33% residential, 67% Commercial.)

The growth capacity of the Joyce UGA includes 134 units and 47.1 acres within the low-density category, and 250 units and 44.8 acres within the moderate-density category. Because no housing allocation has been assigned to the UGA, the capacity shown in Table 8 also serves as an indication of surplus housing capacity for the purposes of this analysis.

Clallam Bay/Sekiu Urban Growth Area (UGA). The Clallam Bay/Sekiu UGA includes approximately 1,397 acres of unincorporated urban area located along the western portion of the Straits Regional Planning Area. The UGA does not abut an incorporated city. It relies on PUD #1 of Clallam County for power and the majority of its water supply, and Clallam County Public Works Department for the operation of its municipal sewer system. Zoning for the area includes a mix of regional commercial, a range of moderate and low-density residential, and substantial areas zoned Industrial (M). Net capacity for the zone categories present is shown in Table 9-A, below.

Table 9-A: Net Residential Capacity for Clallam Bay/Seki UGA

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (30.3%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
URH	Vacant	1022	309.3	712	215.6	605	183.2	Low Density	669	208.3
	Partial use	122	48.0	85	33.5	64	25.1			
UC *	Vacant	327	66.6	228	46.4	194	34.8	Moderate Density	266	49.3
	Partial use	134	24.5	94	17.1	70	14.5			
ADU Capacity (based on Table 4. Units added to Moderate Density)						2				
Total Gross Residential Capacity:									935	257.6

(* Mixed-use Zones Assume 33% residential, 67% Commercial.)

Table 9-A shows a growth capacity of 669 additional units across 208.3 acres within the low-density category, and 266 units across 49.3 acres in the moderate-density category. There is no capacity shown within the high-density category. Total capacity is shown to include 935 units over 257.6 acres. A comparison of this capacity to the future housing needs by income segment is shown in Table 9-B, below.

Table 9-B: Housing Capacity Compared to Housing Needs for CB/Seki UGA

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone Categories Serving Need Level	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0-30% Non PSH	10				
0-30% PSH	5	High Density	24	0	-24
>30-50%	9				
>50-80%	4				
>80-100%	1	Moderate Density	6	266	260
>100-120%	1				
>120%	0	Low Density	0	669	669

Table 9-B shows a capacity deficit under the high-density category. At less than 4 units per acre, the URH zone, as the exclusive residential zoning designation for the UGA, does not appear adequate by itself to meet housing demand over the 20-year planning horizon for the high-density category. The capacity for growth in the low and moderate density categories suggests opportunity for reconsidering zoning for the UGA that better aligns with future housing demand.

Forks Urban Growth Area (UGA). The Forks UGA covers approximately 2,278 acres of unincorporated urban area abutting the incorporated boundaries of the City of Forks. Zoning for the area is predominantly a mix of low and moderate-moderate density with very limited area (approx. 3 net-acres) allowing high-density residential use. Net capacity for the zone categories present is shown in Table 10-A, below.

Table 10-A: Net Residential Capacity for Forks UGA

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (28.3%)		Capacity after Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
URL	Vacant	2,030	998.2	1,456	715.7	1,237	608.4	Low Density	1,603	833.0
	Partial use	680	417.8	488	299.6	366	224.7			
UC *	Vacant	53	9.2	38	6.6	32	5.6	Moderate Density	1,278	162.7
	Partial use	136	26.1	97	18.7	73	14.0			
LD	Vacant	925	103.9	663	74.5	564	63.3			
	Partial use	1,129	148.2	809	106.3	607	79.7			
UNC *	Vacant	16	1.0	12	0.7	10	0.6	High Density	49	3.4
	Partial use	74	5.2	53	3.7	40	2.8			
ADU Capacity (based on Table 4. Units added to Moderate Density)						2				
Total Gross Residential Capacity:									2,930	999.1

(* Mixed-use Zones Assume 33% residential, 67% Commercial.)

The information in Table 10-A demonstrates a growth capacity of 1,603 additional units across 833.0 acres within the low-density category, 1,278 units across 162.7 acres in the moderate-density category, and 49 units within 3.4 acres in the high-density category. A comparison of this capacity to the future housing needs by income segment is shown in Table 10-B, below.

Table 10-B: Housing Capacity Compared to Housing Needs for Forks UGA

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone Categories Serving Need Level	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0-30% Non PSH	10				
0-30% PSH	5	High Density	24	49	25
>30-50%	9				
>50-80%	4				
>80-100%	1	Moderate Density	6	1,278	1,272
>100-120%	1				
>120%	0	Low Density	0	1,603	1,603

Table 10-B indicates a surplus of housing capacity of 1,603 units for low-density, 1,272 units for moderate-density, and 25 units for high-density categories. Although this information suggests that current zoning is adequate to meet the housing needs of all income segments over the 20-year planning horizon, consideration may be given to increasing the area of high-density zoning in order to provide more balanced opportunity for housing in all segments.

Rural Clallam County. Clallam County covers a land base of approximately 1,739 square miles, or just over 1.1 million acres. However, shared within its borders are large areas of municipal, tribal, state and federal lands that are operated outside of the County's jurisdiction. A summary of these areas includes:

- Olympic National Park: 313,355 acres
- Olympic National Forest: 238,145 acres
- Sovereign Tribal Lands: 34,322 acres
- State Department of Natural Resources: 154,348 acres
- State Parks Department: 4,269 acres
- Incorporated Cities: 16,094 acres

Total Non-County Area: 760,533 acres

(Data source: Clallam County GIS System, March 2, 2025)

The removal of these areas reduces the actual area of Clallam County jurisdiction to **352,235 acres**, and **344,180 acres** outside of designated UGAs. Clallam County offers a range of zoning designations across the non-urban, unincorporated areas that are density-appropriate for allowing rural residential development that assures protection of rural character, environmentally sensitive areas and protection of designated resource areas. Also included are areas allowing more intensive development, including higher-density Limited Areas of More Intensive Rural Development (LAMIRDs), and nodal community and tourist-oriented commercial areas reflective of historic community patterns.

In evaluating the capacity of rural areas, it is important to note that a fundamental goal of the GMA is to encourage new development within cities and UGAs where services necessary for development can be provided in an efficient manner (RCW 36.70A.020). As a result, it is not the intent of this Comprehensive Plan update to address housing accommodations for all affordability segments within rural Clallam County, but the allowance of reasonably scaled development within rural Clallam County is still fundamental to this effort.

Net capacity for the zone categories present in rural Clallam County is shown in Table 11-A, below.

Table 11-A: Net Residential Capacity for rural Clallam County

Zoning District	Development Status	Gross Residential Capacity in Zone		Capacity after Critical Area Deduction (18.2%)		Capacity after 40% Market Deduction		Assigned Zone Category	Net Capacity in Zone Category	
		Units	Acres	Units	Acres	Units	Acres		Units	Acres
AR	Vacant	397	3,568.1	325	2,918.7	195	1,751.2	Rural and Resource Density	6,799	200,573.5
	Partial use	21	563.3	17	460.8	10	276.5			
CF	Vacant	3,452	355,443.5	2,824	290,752.8	1,694	174,451.7			
	Partial use	63	7,429.2	52	6,077.1	31	3,646.3			
CFM20	Vacant	50	554.9	41	453.9	25	272.3			
	Partial use	6	181.8	5	148.7	3	89.2			
CFM5	Vacant	238	1,034.2	195	846.0	117	507.6			
	Partial use	85	568.7	70	465.2	42	279.1			
R20	Vacant	173	2,034.9	142	1,664.5	85	998.7			
	Partial use	14	616.7	11	504.5	7	302.7			
NC	Vacant	1,955	5,789.5	1,599	4,735.8	960	2,841.5			
	Partial use	136	1,357.4	111	1,110.4	67	666.2			
R5	Vacant	2,209	8,498.5	1,807	6,951.8	1,084	4,171.1			
	Partial use	453	3,805.3	371	3,112.7	222	1,867.6			
RW5	Vacant	1,094	4,646.5	895	3,800.8	537	2,280.5			
	Partial use	112	880.5	92	720.2	55	432.1			
R2	Vacant	67	86.2	55	70.5	33	42.3			
	Partial use	2	14.9	2	12.2	1	7.3			
R1	Vacant	551	479.2	451	392.0	270	235.2			
	Partial use	227	448.2	186	366.6	111	220.0			
RW1	Vacant	107	103.2	88	84.4	53	50.7			
	Partial use	47	57.7	38	47.2	23	28.3			
RSC	Vacant	114	123.1	93	100.7	56	60.4			
	Partial use	44	92.3	36	75.5	22	45.3			
RCC5	Vacant	335	2,103.3	274	1,720.5	164	1,032.3			
	Partial use	33	797.1	27	652.0	16	391.2			
RCC3	Vacant	491	2,794.6	402	2,286.0	241	1,371.6			
	Partial use	39	754.4	32	617.1	19	370.3			
RLM	Vacant	255	2,002.5	209	1,638.0	125	982.8			
	Partial use	160	1,271.8	131	1,040.3	79	624.2			
QR	Vacant	188	121.3	154	99.2	92	59.5			
	Partial use	194	141.5	159	115.7	95	69.4			
RC *	Vacant	16	7.0	13	5.7	8	3.4			
	Partial use	9	6.2	7	5.1	4	3.1			
RV *	Vacant	4	1.0	3	0.8	2	0.5			
	Partial use	1	0.6	1	0.5	0	0.3			
RV2 *	Vacant	2	1.1	2	0.9	1	0.6			
	Partial use	1	2.5	1	2.1	0	1.2			
DPA *	Vacant	15	7.2	12	5.9	7	3.5			
	Partial use	-	-	-	-	-	-			
CEN *	Vacant	15	6.9	12	5.6	7	3.4			
	Partial use	9	6.4	7	5.2	4	3.1			
WRC *	Vacant	327	166.1	268	135.8	161	81.5			
	Partial use	104	62.1	85	50.8	51	30.5			
RNC *	Vacant	4	4.4	3	3.6	2	2.1			
	Partial use	11	14.6	9	12.0	6	7.2			
TC *	Vacant	17	8.4	14	6.9	8	4.1			
	Partial use	9	7.7	7	6.3	4	3.8			
ADU Capacity (based on Table 4)						82		Moderate Density	82	

(* Mixed-use Zones Assume 33% residential, 67% Commercial.)

The information in Table 11-A shows a growth capacity of 6,799 additional units throughout rural Clallam County. This capacity exists within the rural-density category. A comparison of this capacity to the future housing needs by income segment is shown in Table 11-B, below.

Table 11-B: Housing Capacity to Housing Need for Rural Clallam County

Income Level (% AMI)	Projected Housing Need (HAPT C)	Zone Categories Serving Need Level	Aggregated Housing Needs	Total Capacity	Capacity Surplus or Deficit
0-30% Non PSH	0				
0-30% PSH	0	High Density	0	0	0
>30-50%	0				
>50-80%	124				
>80-100%	44	Moderate Density	202	82	-120
>100-120%	34				
>120%	812	Low/Rural Density	812	6,799	5,987

The HAPT Method C model did not allocate any demand for very low and extremely low-income segments for rural areas. It is assumed the needs of these segments will be addressed in urban areas where the high-density zone category is feasible. Table 11-B shows a capacity deficit under the moderate-density category of 120 units. This will require the reallocation of 120 moderate-density units to the existing Urban Growth Areas. Since each UGA has capacity in the moderate-density category to accommodate this allocation, no further analysis is necessary. With this adjustment, the information demonstrates that there exists sufficient capacity within rural Clallam County under existing zoning standards to accommodate allocated housing demand over the 20-year planning horizon.

Emergency Housing Capacity

In addition to ensuring capacity for housing in all income segments, RCW 36.70A.070(2)(c) specifically requires the County to ensure sufficient capacity of developable land for emergency housing and emergency shelters. This capacity is in addition to the housing capacity analyzed earlier in this report and is intended to provide for community needs presumed to exist as the community works towards meeting its allocated income-segment housing goals. RCW 36.70A.030, defines emergency housing and emergency shelters as follows:

(14) "Emergency housing" means temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless that is intended to address the basic health, food, clothing, and

personal hygiene needs of individuals or families. Emergency housing may or may not require occupants to enter into a lease or an occupancy agreement.

(15) "Emergency shelter" means a facility that provides a temporary shelter for individuals or families who are currently homeless. Emergency shelter may not require occupants to enter into a lease or an occupancy agreement. Emergency shelter facilities may include day and warming centers that do not provide overnight accommodations.

The analysis for determining adequate capacity for emergency housing and emergency shelters is different from the housing allocations discussed earlier in this report. Instead of measuring capacity in dwelling units, emergency housing/shelters are measured in available beds. Depending on the circumstances, these "beds" can be arranged in discrete, private living quarters, or may be assembled in more general living arrangements. Since "...basic health, food, clothing and personal hygiene" are considered part of emergency housing, consideration must also be given to their provision. In determining the need for emergency housing over the 20-year planning horizon, Clallam County relied on the outputs from the HAPT Method C model, which included allocations for each jurisdiction. This information is summarized later in Table 13.

The Department of Commerce recommends the following sequence (summarized for space) for evaluating capacity for emergency housing and emergency shelters:

- 1) Identify all parcels in zones that allow indoor emergency housing and indoor emergency shelters.
- 2) Within this set, identify vacant parcels, under-utilized parcels, and those with existing motels and hotels.
- 3) Adjust available parcels according to development within the pipeline.
- 4) Apply any adopted spacing or intensity requirements under existing regulations.
- 5) Determine capacity of individual parcels' ability to accommodate emergency housing; or develop an assumed density method based on existing emergency shelters.
- 6) Add the calculated capacity from all available sites.
- 7) Document the available capacity compared to the allocated emergency housing need.³

Currently, the Clallam County Zoning Code does not list emergency housing or emergency shelters within its use tables. In accordance with CCC 33.05.010, CCC, "[u]nclassified uses may be allowed through the issuance of a conditional use permit." Theoretically, this would allow for the development of emergency housing within any urban zoning districts. However, it is doubtful that, exclusively, the conditional use

³ Guidance for Updating Your Housing Element, V. 3.4, Washington Department of Commerce, Sept. 2024.

permit process would be considered compliant with the requirements of RCW 36.70A.070(2)(c). That said, CCC 33.03.010(73) defines Motel/Hotel as "...a structure which provides overnight, short-term boarding to transient guests and not defined as a bed and breakfast inn facility."

The definitions for emergency housing and emergency shelters provided earlier are clearly a subset of the uses allowed under this definition for Motel/Hotel. And although it is strongly recommended that the Clallam County Zoning Code be amended to incorporate provisions specific to emergency housing and emergency shelters, for the purposes of this capacity analysis and in accordance with the Department of Commerce's guidance, those zones that permit Motel/Hotel developments will be considered. Since they are dependent on an urban setting, the following zones, which allow Motel/Hotel uses outright, will be considered:

- * Urban Neighborhood Commercial, UNC (CCC 33.15.070)
- Urban Regional Commercial, URC (CCC 33.15.080)
- * Urban Center, UC (CCC 33.15.090)
- * Carlsborg Village Center, CN (Table 33.20.040(A))
- Carlsborg General Commercial, CGC (Table 33.20.040(A))
- * Carlsborg Commercial, CC (Table 33.20.040(A))

* Mixed-use zones assume 33% residential, 67% commercial.

The parcel database containing the Clallam County Assessor's records were queried for vacant parcels within the above-mentioned zones. Mixed-use zones assumed a 33% residential development rate, leaving 67% available for commercial, including the possible development of Motels/Hotels and emergency shelters. As with housing capacity, deductions were calculated for the presence of critical areas and a standard market factor. The results are shown in Table 12, below:

Table 12: Available lots and acreage for Emergency Housing

Zoning District		Sequim UGA	Carlsborg UGA	Port Angeles UGA	Joyce UGA	Clallam Bay/CQ UGA	Forks UGA	Total
* CN	Available Lots		4.7					4.7
	Available Acres		4.3					4.3
CGC	Available Lots		10					10.0
	Available Acres		<u>11.0</u>					11.0
* CC	Available Lots							0.0
	Available Acres							0.0
* UC	Available Lots				15.4	58.3	16.1	89.8
	Available Acres				<u>50.7</u>	<u>135.1</u>	18.8	204.6
* UNC	Available Lots			60.3			2.0	62.3
	Available Acres			41.8			<u>2.1</u>	43.9
URC	Available Lots			10				10.0
	Available Acres			<u>8.6</u>				<u>8.6</u>
Gross Total	Available Lots	0	14.7	70.3	15.4	58.3	18.1	176.8
	Available Acres	0.0	15.3	50.4	50.7	135.1	20.8	272.4
Total after CA deduction	Available Lots	0	14.2	58.0	11.8	40.6	13.0	137.6
	Available Acres	<u>0.0</u>	<u>14.8</u>	<u>41.6</u>	<u>38.7</u>	<u>94.2</u>	<u>14.9</u>	<u>204.3</u>
Total	Available Lots	0	12.1	49.3	10.0	34.5	11.0	117.0
w/market	Available Acres	0.0	12.6	35.3	32.9	80.1	12.7	173.6

(* Mixed-use Zones Assume 33% residential, 67% Commercial.)
(CA - Critical Areas)

There are currently no emergency housing projects within unincorporated Clallam County to consider with respect to additional emergency shelter facilities inventory. There are also no standards regarding the placement, spacing, or other controls to consider with respect to citing such facilities. Although it is strongly recommended that Clallam County consider the adoption of such standards, their absence, for the purposes of this analysis, suggests that such facilities could be placed anywhere within the above-identified acreage.

There is currently only one significant emergency shelter in Clallam County, which is operated by Serenity House of Clallam County. The facility includes 152 available beds⁴ over 1.28 acres. This produces a comparable rate of **118.8 beds per acre** for evaluating emergency shelter needs. To be clear, other non-governmental entities do operate emergency shelters in Clallam County. They include Healthy Families (18 beds), The Answer for Youth (TAFY)(2 beds), Forks Abuse (5 beds) and Sarges Place (8 beds)⁴. However, the number of beds available and their intended purposes make them less than ideal for comparison for this report.

As recommended by Commerce, the data assembled under Table 12 was compared to the HAPT C allocation for emergency housing. The results are shown in Table 13, below:

⁴ Clallam County Coordinated Entry Annual Report, Serenity House of Clallam County, October 24, 2024.

Table 13: Emergency Shelter Capacity to Need for Unincorporated County

	Sequim UGA	Carlsborg UGA	Port Angeles UGA	Joyce UGA	Clallam Bay/CQ UGA	Forks UGA	Total
Available acres	0.0	12.6	35.3	32.9	80.1	12.7	173.6
Current Capacity	0	1497	4199	3913	9511	1509	20,630
Projected Emergency Housing Need	27	16	27	0	3	3	76
Additional Acreage needed	<u>0.23</u>	<u>0.13</u>	<u>0.23</u>	<u>0.00</u>	<u>0.03</u>	<u>0.03</u>	<u>0.64</u>
Capacity Surplus or deficit # of units	<u>-27</u>	<u>1481</u>	<u>4172</u>	<u>3913</u>	<u>9508</u>	<u>1506</u>	<u>20,554</u>

The allocated (projected) emergency shelter “need” (number of beds) is significantly less than the capacity under existing zoning, with the exception of the Sequim UGA. It is recommended that the zoning for the Sequim UGA be amended to incorporate opportunity for emergency shelter development for a minimum of 0.23 acres in order to address the projected need over the 20-year planning horizon. Per Department of Commerce guidance, this analysis should be applied to the zoning changes once completed to demonstrate adequate capacity for future emergency housing needs.

Employment Forecast and Allocations

The GMA requires Clallam County to determine and allocate projected employment needs for the unincorporated and incorporated portions of the County. This allocation will then be used by the County and individual cities to determine whether there is sufficient capacity to accommodate future employment growth, or whether changes are needed in the jurisdiction’s land use and zoning regulations in order to accommodate expected employment needs in the future.

In Clallam County, employment and economic activity does exist within residentially zoned properties in the form of appropriately scaled home enterprises and home-based industries. And while it is important to the economic health of the County to maintain these flexible economic opportunities, it is generally intended that development of new commercial and industrial uses will occur in appropriately zoned locations.

Therefore, this analysis looks specifically at commercial and industrial-zoned properties. It should also be noted that this analysis is simply for the purpose of evaluating growth capacity, not whether the types of business developments meet family-wage jobs or other economic indicators. Those issues will be considered in greater detail within the text of the Comprehensive Plan.

Allocations to Cities and County

Clallam County considered data from the Washington State Employment Security Department (ESD) for determining current employment numbers for all of Clallam County. As of December 2024, there were a total of **26,536** employed individuals and a total of **1,737** unemployed individuals for a total labor force of **28,273** within the County. In order to align current employment data with current population, the projected 2024 Population Estimate of **78,550⁵** was used. Combined, the two figures provide a *Population to Employment Ratio (PER)* of:

$$78,550 / 28,273 = 2.78$$

The PER of 2.78 indicates that, to maintain adequate employment capacity, a capacity of one new job for every 2.78 people that move into the County will have to be demonstrated. Projecting this PER over the 20-year Planning Horizon assumes the current demographic mix within the County remains stable. Since the PER is based on 2024 data, the expected population growth has to be adjusted to 2024 figures. Subtracting the difference of the 2020 census total (77,155) and the 2024 projected total (78,550) from the projected 2045 growth estimate (Table 2) means that the expected population growth total from 2024 to 2045 will be:

$$9,545 - 1,395 = 8,150$$

As a function of population growth, the number of new jobs needed over the 20-year planning horizon for each jurisdiction is included in Table 14, below.

Table 14: Employment Allocations for All Jurisdictions

Jurisdiction	Percent Growth Allocation	Projected Population Growth	Employment Growth Allocation
City of Forks	5.0%	408	147
Forks UGA	0.5%	41	15
City of Port Angeles	33.0%	2,690	967
Port Angeles UGA	5.0%	408	147
City of Sequim	31.0%	2,527	909
Sequim UGA	5.0%	408	147
Clallam Bay/Seki UGA	0.5%	41	15
Joyce UGA	0.0%	-	-
Carlsborg UGA	3.0%	245	88
Unincorporated Rural	17.0%	1,386	498
Totals by 2045:		8,150	2,932

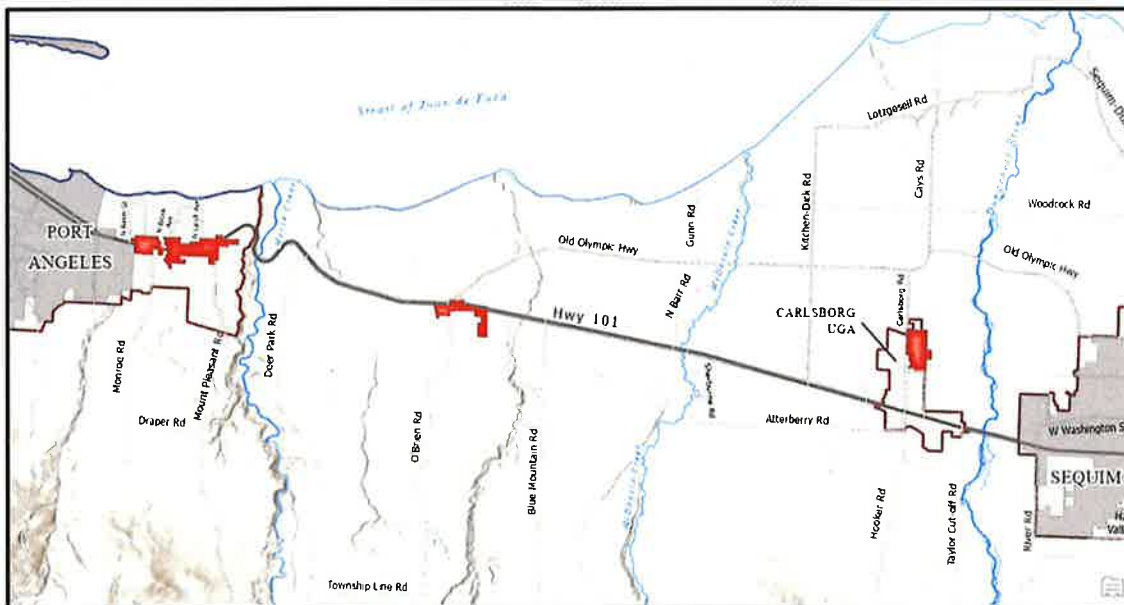
⁵ Population of Cities, Towns and Counties, Office of Financial Management, June 5, 2024

Employment Capacity Estimate Methodology

Establishing capacity for accommodating future employment needs within existing commercial and industrial areas requires a combination of determining existing land availability and what the likely density of employment will be within these areas. Unlike residential zoning, determining underutilized commercial and industrial areas is more difficult as the economic use of land is not necessarily determined solely by building area, and related zoning districts do not require density standards per se. For this reason, only vacant parcels are being considered as future capacity stock. The pivotal assumption is that future business growth will likely occur at densities and character similar to that which currently exists in some of the more established commercial and industrial areas of unincorporated Clallam County—including a commensurate mix of underutilized parcels.

Establishing metrics for the anticipated density of employment likely to occur in future commercial and industrial development also requires examining existing conditions in areas of Clallam County with more established businesses as a measure of what is likely to be experienced throughout the available commercial and industrial land base. To achieve this, three local business areas were analyzed:

Figure 1: Representative Commercial & Industrial Nodes



- *The commercial core of the east Port Angeles Urban Growth Area.* This area consists of approximately 272.6 acres consisting of 99.8 acres of Urban Regional Commercial (URC) and 177.8 acres of Urban Neighborhood Commercial (UNC) zoning. The area consists of a mix of long-standing commercial activity intermixed with new commercial developments serving both local and regional goods and service needs. The over-all density of businesses makes this area a good proxy for capacity analysis of urban-density commercial areas throughout unincorporated Clallam County.

- *The commercial node at Highway 101 and O'Brien Rd/Old Olympic Highway.* This area covers approximately 98.5 acres, consisting of 42.8 acres of Rural Limited Commercial (RLC) and 20.1 acres of Rural Neighborhood Commercial (RNC) zoning. The density of business and character of development make this area a good proxy for rural commercial zoning districts throughout unincorporated Clallam County.
- *The Carlsborg Industrial Park.* The Carlsborg Industrial Park covers approximately 86.1 acres of Carlsborg Industrial (CI) zoning. Historically, this area began without the benefit of public sewer, which was later provided in 2017. The moderate degree of development that exists is representative of industrial areas developing where full provision of urban services may be phased in at a later date. For this reason, it is an excellent proxy for industrial lands within unincorporated Clallam County.

The parcel database for each of the three areas was analyzed for commercially developed lots and corresponding lot area. Information regarding the number of employees was obtained from a variety of sources, including permit history, online business data, and simply contacting the owner for inquiry. Where no data was available, the specific parcel and development was not included in the analysis. By totaling the number of employees and total acreage of all parcels considered, an Employees Per Acres (EPA) ratio for each representative area was developed, as follows:

Table 15: Demonstrated Employees Per Acre (EPA) Ratio

Focus Area	# of Lots Considered	Lot Acreage	Total Employees	EPA
East PA UGA Commercial Core	64	127.1	1258	9.9
O'Brien/SR 101 Commercial Node	11	21.27	97	4.6
Carlsborg Industrial Park	22	37.92	301	7.9

The demonstrated EPA was applied to the identified vacant parcels contained in the existing commercial and industrial zoning districts in unincorporated Clallam County. To ensure internal consistency, land determined necessary for future emergency shelter needs as identified in Table 13, above, were removed from consideration. The following is a series of tables that detail the findings of this analysis:

Table 16: Summary of Employment Capacity under Current Zoning

Jurisdiction	Zoning	Gross Vacant Lots		Reduction for Critical areas		Reduction for Market Factor		Net Employment Capacity under Current Zoning
		# of Lots	Acres	# of Lots	Acres	# of Lots	Acres	
Sequim UGA	Commercial	0	0	0.0	0	0	0	0
	Industrial	9	32.0	7.9	28.0	6.7	23.8	188
Carlsborg UGA	Commercial *	14.7	16.0	14.2	15.4	12.1	13.1	130
	Industrial	11	26.8	10.6	25.9	9.0	22.0	174
Port Angeles UGA	Commercial *	70.3	50.2	58.0	41.4	49.3	35.2	348
	Industrial	20	57.9	16.5	47.8	14.0	40.6	321
Joyce UGA	Commercial *	15.4	50.7	11.8	38.7	10.0	32.9	326
Clallam Bay/Seki UGA	Commercial *	58.3	135.1	40.6	94.2	34.5	80.0	792
	Industrial	4	272.2	2.8	189.7	2.4	161.3	1274
Forks UGA	Commercial *	18.1	20.8	13.0	14.9	11.0	12.7	126
	Industrial	1	156.9	0.7	112.5	0.6	95.6	755
Rural Clallam County	Commercial *	102.1	447.8	83.5	366.3	50.1	219.8	1011

* Mixed Use zones are presumed 67% commercial, 33% residential.

Based on the existing employment capacity demonstrated in Table 16 (above) and the employment needs allocation shown in Table 14, earlier, the adequacy of existing zoning to meet the projected employment needs of unincorporated Clallam County is calculated as shown in Table 17, below:

Table 17: Adequacy of Current Zoning for Future Employment Needs

	Sequim UGA	Carlsborg UGA	Port Angeles UGA	Joyce UGA	Clallam Bay/Seki UGA	Forks UGA	Rural Clallam County
Current Capacity	188	304	669	326	2066	881	1011
Projected Employment Need	<u>147</u>	<u>88</u>	<u>147</u>	<u>0.0</u>	<u>15</u>	<u>15</u>	<u>498</u>
Capacity Surplus (Deficit)	<u>41</u>	<u>216</u>	<u>522</u>	<u>326</u>	<u>2051</u>	<u>866</u>	<u>513</u>

The information summarized in Table 17, above, demonstrates that sufficient capacity exists in current zoning to accommodate the projected, allocation employment growth that is expected in unincorporated Clallam County over the 20-year planning horizon.

Findings and Recommendations

The information contained in this analysis produced key findings and recommendations for future decision-making concerning the 2025 periodic update of the Clallam County Comprehensive Plan, including the following:

1. Per Commerce guidance, data showed nominal shortfall in fully accommodating very low and extremely low-income segments in the Sequim and Clallam Bay/Sekiu UGAs. Specifically, the unincorporated Sequim UGA shows a need for an additional 147 units in the *High-Density* category, and the Clallam Bay/Sekiu UGA shows a need for an additional 24 units also in the *High-Density* category. Changes are needed to current zoning in order to correct these deficiencies.
2. A reallocation of approximately 120 units in the *Moderate-Density* category is needed from rural County to unincorporated UGAs. Sufficient capacity exists in all UGAs to accommodate this need. All other areas of unincorporated Clallam County are shown to have sufficient capacity under existing zoning to accommodate growth over the 20-year planning horizon.
3. The lack of successful implementation of the Transfer of Development Rights (TDR) program as set forth under CCC 33.26, is proving to be a barrier to achieving housing and agricultural preservation objectives. Without an economically attractive program design, the requirement is merely proving to be a barrier to higher-density residential growth in the unincorporated Sequim UGA. Consideration should be given to adjusting the program to improve its attractiveness, or its removal as a requirement.
4. The analysis shows a lack of opportunity for the development of emergency shelters and emergency housing within the Sequim UGA. It is recommended that the zoning for the Sequim UGA be amended to incorporate opportunity for emergency shelter development for a minimum of 0.23 acres in order to address the projected need over the 20-year planning horizon. Per Department of Commerce guidance, a new analysis should be applied to any subsequent zoning changes, once completed, to demonstrate adequate capacity for future emergency housing needs.
5. The Clallam County Zoning Code should be amended to incorporate provisions specific to emergency housing and emergency shelters. Standards should be considered regarding the placement, spacing, or other operational and nuisance controls for the appropriate siting of such facilities.
6. Per Commerce guidance, the analysis concerning employment allocation shows that existing zoning is adequate to accommodate projected and allocated employment needs based on the capacity of lands within existing commercial and industrial zoning categories according to demonstrated employee per acre (EPA) assumptions.
7. This analysis considered only the minimum conditions required to accommodate projected and allocated housing and employment needs according to Commerce guidelines and the requirements of the GMA (RCW 36.70A). Arriving at final

recommendations for meeting future housing demand and employment growth will require further analysis and considerations under the Housing and Economic Development Elements of the Comprehensive Plan.

DRAFT

List of Appendices

- A. Clallam County Resolution 101, November 26, 2024**
- B. Housing for All Planning Tool (HAPT), Method C, August 28, 2024**
- C. Accessory Dwelling Unit (ADU) Data, March 4, 2025**
- D. Zoning Districts and Densities, May 19, 2025**
- E. Parcel Data for Commercial Nodes, May 20, 2025**
- F. Employment Capacity EPA, May 30, 2025**