

AGENDA

Clallam County Planning Commission

Planning Commission Meeting of Wednesday, July 16, 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:** June 18, 2025
- 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:**
- J. WORK SESSION ITEMS:** Joint Work Session with Board of County Commissioners regarding the Comprehensive Plan Update
- K. PUBLIC COMMENT – Please Limit Comments to Three Minutes**
- L. DISCUSSION OF PUBLIC COMMENTS**
- M. GOOD OF THE ORDER**
- N. ADJOURNMENT**

Members:

Chair, Steve Gale & Vice-Chair, Ron Long
Bonnie Booth; Thomas Butler; Katina Hester;
Kenneth Reandeau; Jane Hielman; Dann May; Warren Billups

Department of Community Development Staff:

Tim Havel, Deputy Director; Bruce Emery, Director

MINUTES

Clallam County Planning Commission

Meeting of June 18, 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, Warren Billups, Tom Butler, and Bonnie Booth. Bruce Emery, Director, Donella Clark, Principal Planner, represented staff from the Department of Community Development.
- D. WELCOME: Vice-Chair Long welcomed all in attendance.
- E. APPROVAL OF MINUTES: Commissioner Booth moved to approve the minutes and Commissioner Hester seconded.
- F. ANNOUNCEMENTS: Staff would like to scheduled a joint Planning Commission meeting with the Board of County Commissioners July 16, 2025. A letter has bene drafted and sent to the chair for signature to invite the Board to that meeting.

Commissioners Long noted he had received the initial email regarding changes to the platform for Comp Plan information, but did not get the follow-up email that was mentioned in the first email.
- G. PUBLIC COMMENT PERIOD: Dawn Andres, representing the Cooperative Model, is learning what the PC is doing. Group is looking to help find creative ways to get into the work force, helping land use regulations to support economy and housing.
- H. UNFINISHED BUSINESS: None.
- I. PUBLIC HEARING ITEM: Director Emery provided a presentation of his staff report on the proposed changes to the codes to address regulating RV's and add the regulations required by the State regarding accessory dwelling units in Urban Growth Areas. No public was present in the room or online. Commissioner Hester moved to recommend the changes to the Board of County Commissioners, and Commissioner Boot seconded. Motion passed 5-1.
- J. WORK SESSION ITEMS: Director Emery presented information of the Lands Capacity Analysis, a requirements of the GMA update. Commissioner Hester asked how we balance the place we want to live with Commerce's requirements to grow and wants to ensure that our transportation capacity is considered. Commissioner Billups hopes the GMA update takes into account the realistic expansion of utilities. Commission discussed the report and will continue discussions of the GMA update at the next meeting.
- K. PUBLIC COMMENT PERIOD: None.
- L. DISCUSSION OF PUBLIC COMMENTS: None.
- M. GOOD OF THE ORDER: None.
- N. ADJOURNMENT: The meeting adjourned at __7:25__ p.m.



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Memorandum

Date: July 9, 2025
To: Clallam County Planning Commission
Board of Clallam County Commissioners
From: Bruce Emery, Director of Community Development
Re: Joint Work Session for the Comprehensive Plan Update, July 16, 2025

Clallam County is required under RCW 36.70A.130, to periodically review, and if necessary, update its Comprehensive Plan to respond to changing conditions and maintain compliance with the requirements of the Growth Management Act (GMA). The current Comprehensive Plan Update (CPU) must be completed no later than December 31, 2025.

To help meet this deadline and to ensure the CPU includes recommended language that will satisfy the current requirements of the GMA, Clallam County entered into contract with two separate consulting firms, Cascadia Consulting Group, Inc., and Facet, Inc. The Cascadia team was contracted to assist with the updating of the Clallam County Hazard Mitigation Plan and to assist with the development of the newly-required Climate Element and Climate Resiliency Sub-Element for the CPU. The Facet team assisted with all other required changes to the CPU.

Consultants' Recommendations

To date, drafts for most of the GMA-required changes have been provided by the consultants for the CPU. The enclosed Comprehensive Plan Amendment Summary Report includes a brief synopsis of the different Comprehensive Plan and development regulation recommendations made by the consulting teams as well as the Project Charter describing Facet's deliverables. The Report specifically includes the following:

- **CPU Project Charter.** The Project Charter establishes the framework in which Facet and County Staff work towards the common goal of completion and adoption of a CPU that meets all applicable requirements of the GMA. The Project Charter identifies several changes in the GMA that the CPU must address to be GMA compliant.
- **Critical Areas Analysis, Best Available Science (BAS) Report.** The GMA requires the CPU and development regulation (Critical Areas Ordinance) to reflect the best available science as the basis for regulating activities in and around designated critical areas. Because what is determined as BAS changes

periodically, it is an essential part of the CPU process. The BAS Report identifies and recommends draft language for improving critical area protection policies and the regulations of the Clallam County Critical Areas Ordinance (CAO) consistent with BAS.

- **Critical Areas Analysis, GAP Analysis.** The Critical Areas GAP Analysis is a precursor to the BAS Report. This Report identifies those areas of environmental protection policy and CAO regulations that no longer meet current BAS standards. This report formed the basis for the recommendations contained in the BAS Report above.
- **Economic Development Policy Analysis.** This Report evaluates current economic trends and presents actionable recommendations in the form of Draft Comprehensive Plan policies. The Report is based, in part, on the Clallam County Economic Development Councils' (EDC) Five-Year Economic Development Plan, in which they strongly recommends focus in four key employment sectors: construction, forest products, manufacturing and maritime.
- **Transfer of Development Rights (TDR) Program Analysis.** The 2025 Land Capacity Analysis (LCA) identified that the Transfer of Development Rights program currently implemented under Ch 33.26, CCC, in its current iteration, is not achieving its intended purpose, and is proving to be a barrier to higher-density residential development needed in the Sequim Urban Growth Area (UGA). The program establishes a system in which a land owner wishing to develop property within the Sequim UGA may increase the density available to them by purchasing the rights for development from a land owner owning property within the Agricultural Retention (AR) Zone. The program was intended to protect agricultural lands by preempting their development through the sale of the development rights available to the owner. This would allow compensation for the development value of the land and allow additional value to the UGA property owner by increasing the number of residential units they could potentially develop.

The problem is, not one TDR has successfully occurred since the program's implementation in 1998. Discussion on this issue has included the possibility of suspending the program but keeping it within the policies of the Comprehensive Plan pending further analysis, adjustments, and most likely waiting for economic conditions to change to where the program may become more economically viable. This Report is still a work in progress.

- **Housing Element Technical Analysis.** The Housing Element Technical Analysis takes information that was presented in the LCA and provides further analysis forming the basis for policy recommendations concerning housing needs in Clallam County. As in prior discussions concerning the LCA, the GMA now requires all jurisdictions to plan for housing needs based on income segment.

Also noted in the LCA, this will drive the need to consider changes to zoning densities within the Sequim and Clallam Bay/Seki UGAs.

- **Climate Element.** The Comprehensive Plan Climate Element was developed in response to HB 1181, which requires the County to integrate climate mitigation and resilience policies within the CPU. This work will include amending several sections of the Comprehensive Plan in which climate change could have an impact, such as housing, shorelines and flood risk, expanded risk of wildfires, capital facilities and utility planning, and environmental protection.

The full text of each of the above reports and other supporting documents can be viewed here: <https://www.clallamcountywa.gov/1842/Comprehensive-Plan-Update>

Community Survey Results

Between December 20, 2024, and March 25, 2025, the Department of Community Development ran an online Community Survey that posed a series of questions relating to the current conditions of Clallam County across a range of different subject areas. The purpose of the survey was to gauge the perception and preferences of community members over several topics that could be impacted by the CPU. A total of **464** responses were documented.

In addition to a series of standardized questions, participants were asked to provide their own comments concerning the subject matter. Of the respondents who provided their own comments, several reoccurring themes emerged.

Community Online Survey, Responses in their own words		
Subject Area	Response	Number of Respondents
Diversity	Improve healthcare access (hospital)	19
	Need for childcare, family-friendly activities to attract young families	18
	More job opportunities	9
	Too many resources for the homeless	8
	Emphasize National Park access, keep recreational forest use intact	7
	Better code enforcement for RVs, garbage and derelict houses	7
	Increase number of access points off the Peninsula	7
	Protect farmland from development	6
	Not enough resources for the homeless	6
Transportation	Increase transit frequency	12
	Improve Strait Shot access/access to Seattle	10
	Free transit is extremely helpful and should be supported/continued	8
	Need for commercial flights from Fairchild to Seattle	8
Community	We need glass recycling back	7
	County is spending too much on Sheriff/police	4

The questionnaire response portion of the Online Survey also provided revealing information on the areas of concern felt by respondents. On a four-tier ranking from "great strength," "strength," "weakness" and "great weakness," respondents generally articulated that Clallam County provides opportunity for a good quality of life, sense of community, and provision of public services. Outdoor recreation opportunities were identified as a great strength. Employment opportunities, housing, childcare and medical services appeared as a weakness, with workforce housing, temporary worker housing, the value and cost of homes and housing availability for low-income families ranked as a great weakness.

The final report from the online survey remains a work in progress. Once complete, it will be made available for viewing. The text of the Survey can be viewed here:

https://clallamcountywa-my.sharepoint.com/:w:/g/personal/tim_havel_clallamcountywa_gov/EanhqIFkhrxBsjncu1Ae6bkBRx8JVAW3yS9rKf_5HO0qLg?e=9IUwe1&CID=C8C40625-BF5D-4F25-8D1B-FDC37D23BD9B&wdLOR=cCF18259B-FBBC-4B1C-B54A-6167C9555B9A

Staff-Identified Issues

Staff with the DCD encounter community issues on an ongoing basis. Trends in land use priorities and development, business ventures, environmental protection, and other challenges facing the community are typically front and center at the Building and Planning counters. Because of this experience, Staff are uniquely positioned to recognize trends and provide recommendations for addressing potential issues before they become unresolved problems. The following are issue areas that may be appropriate for addressing as part of this CPU:

- **Glamping/Hip-Camp.** Recreational camping has blossomed as a substantial cottage industry in Clallam County. With it can come certain impacts to neighboring residences and emergency responders. Most zoning districts in Clallam County allow for "outdoor-oriented recreational uses" as a conditional land use (requires a conditional use permit (CUP)). However, much of the proliferation has occurred without the benefit of a CUP, adding additional pressure to limited Code Enforcement staff and subjecting neighborhood residences to increase noise, traffic and other operational impacts.

Having a discussion on policies concerning the use of private residential property for camping and other recreational developments could provide positive outcomes in the form of public awareness, consideration of possible standards for addressing impacts, and possibly reducing the work needed on a case-by-case review of such developments.

- **Short-term rentals (STRs).** The City of Port Angeles, and more recently, Jefferson County, have adopted regulations intended to limit the proliferation of STRs, citing the already limited housing supply and impacts to home values created by elevated demand. Clallam County is estimated to have anywhere from 900 to 1100 STRs in the unincorporated area. Although Clallam County

Code does have standards for the establishment of “vacation rentals,” the regulation does not limit their use. There is no clear policy discussion or consideration of economic impact from STRs or any clear data that would inform decision-makers as to the need, or lack thereof, for controls. Opening the issue for discussion would help provide public feedback on whether the issue is substantial or whether other issues should receive priority attention.

- **Residential vacancies.** Similar to STRs, residential vacancies function to hold scarce residential housing stock from circulation and being part of the available housing market. While people have often purchased homes for vacation purposes or retirement, in years past, they would often make use of those homes as rentals. Currently, state regulations provide heightened protections for renters making it less desirable for owners to make their second homes available on a rental basis.

When the City of Port Angeles completed research on the number of STRs within the City limits, they found that although STR numbers were significant, they were dwarfed by home vacancies at a rate of 4 to 1. Although there is likely little to be done to regulate the holding of a vacant home, there may be opportunity to create incentives that could improve the likelihood that such units would become available as rental stock. Opening the issue for policy discussion would help provide public feedback on this matter.

- **Infrastructure, service extensions and annexations.** As a key component of housing development and economic development, infrastructure is vital for seeing growth in our commercial, industrial and urban residential areas. Clallam County has had urban service agreements in the past with the Cities of Sequim and Port Angeles. However, these agreements are approaching two decades and should be re-explored. Reviewing and updating policies for equitable service extensions, annexations and cost-sharing on these ventures will be fundamental in facilitating the appropriate development of these areas, and the County’s ability to meet its housing and economic development objectives.
- **Shoreline development issues and climate change.** The policy discussion in the Draft Climate Element indicates that, among other impacts, low-lying areas adjacent to shorelines are likely to experience sea level rise in the coming years. This issue has already been raised by the Clallam County Marine Resources Committee (MRC) in a committee letter to the Board of County Commissioners (March 26, 2025). The policy considerations that need to take place should consider the predicament these owners face, as well as the potential impacts to shoreline and near-shore resources.

Process and Dates

The DCD has scheduled a series of public community meetings throughout the remainder of July, to present the recommendations of the consultant teams and to present alternatives for discussion on community issues raised in the Community Survey and comments received to date. It is currently planned that the two work sessions before the Planning Commission in August will provide opportunity for

developing the Draft CPU document for public hearing. The current planned schedule is as follows:

- 7/17/25, CPU Community Meeting, Clallam Bay Public Library (NOLS), 6pm – 8pm
- 7/22/25, CPU Community Meeting, Crescent Grange, Joyce, 6pm – 8pm
- 7/23/25, CPU Community Meeting, Guy Cole Center, Sequim, 6pm – 8pm
- 7/24/25, CPU Community Meeting, Forks City Hall, Forks, 6pm – 8pm
- 7/30/25, CPU Community Meeting, Port Angeles Public Library (NOLS), 6pm – 8pm
- 8/6/25, Planning Commission work session, 6:00 pm
- 8/20/25, Planning Commission work session, 6:00 pm
- 9/3/25, Planning Commission Public Hearing, 6:00 pm
- 9/17/25, Planning Commission work session, 6:00 pm

Although some of these dates may be aspirational, this schedule generally provides an outline of the meetings needed to get to the Planning Commission's recommendation on the CPU.

I look forward to reviewing this information with you during the joint 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,



Bruce Emery, Director
Clallam County DCD

Clallam County Dept. of Community Development

Summary Report

Comprehensive Plan Update – Consultant Recommendations

Clallam County Department of Community Development in
coordination with Facet NW and Cascadia Consulting Group
7-1-2025

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Clallam County 2025 Comprehensive Plan Update Project Charter

CLALLAM COUNTY 2025 COMPREHENSIVE PLAN UPDATE

PROJECT CHARTER

Charter Purpose

A project charter is a communication and project management document to help ensure project objectives and timelines are met. This project charter has been developed for the Clallam County 2025 Comprehensive Plan Update and outlines the:

- ✓ Background and framework for the project
- ✓ High-level project approach, outcomes, and deliverables
- ✓ Project schedule and key milestones
- ✓ Roles and responsibilities
- ✓ Keys to project success
- ✓ Potential project risks and strategies to address those risks

Having a project charter is especially vital for a project which involves:

- ✓ Multiple departments, working groups, and agencies
- ✓ Multi-layer recommendation and approval process

Project Background and Framework

The Washington State Growth Management Act (GMA) requires cities and counties to create and update Comprehensive Plans and implement development regulations every 10 years ([RCW 36.70A.130](#)). Comprehensive Plans are 20-year policy documents that guide and plan for growth (population and employment), housing, transportation, capital facilities and utilities, parks, recreation and open space, rural areas, and protection of natural resource lands ([RCW 36.70A.070](#)). The planning window for this update is 2025-2045. Clallam County has completed a 2016 County-wide Planning Policies document and targeted amendments to Clallam County Code (CCC) 31.02 that will assist in guiding this effort.

Approach, Outcomes, and Deliverables

Defining the project approach, along with outcomes and deliverables, ensures all County departments and the consulting team are on the same page throughout the project about the overall project goals. How the project is viewed, what must be accomplished, and the steps and timeframes to get the project completed on time are all important factors that will help define project success.

Project Approach

The GMA requires that "Each comprehensive land use plan and development regulations shall be subject to continuing review and evaluation by the county or city that adopted them." ([RCW 36.70A.130\(1\)\(a\)](#)).

Plan updates are not intended to be a wholesale re-write of the existing Plan. It is an update to extend the planning horizon and recognize changes to:

- State laws/case law since the last update
- Best Available Science (BAS) for incorporation into critical areas regulations

The Clallam Countywide Planning Policies (CPPs) were updated in 2016 to address several changes to the GMA since the previous periodic update. A gap analysis in the form of Commerce's Comprehensive Plan Checklist for GMA requirements will be completed to review all these requirements at both the goal/policy and development regulations level. Identified gaps between the existing 1995 Comprehensive Plan and 2020 Periodic Update to the existing comprehensive plan (CCC Title 31), as well as updates to state laws and regional and countywide policy documents will help inform the approach for this project.

There are several bills that passed the legislature after the CPP update. Therefore, there may be topics the county must take up that are not reflected within the current CPPs.

The following represents some of the state law changes that occurred during the 2021-2022 and 2022-2023 Legislative Sessions. Each of these are identified within the Department of Commerce periodic update checklist which is discussed below.

- [HB 1220](#) substantially amended housing-related provisions of the GMA, [RCW 36.70A.070\(2\)](#). Please refer to the following Commerce housing webpages for further information about the new requirements: [Updating GMA Housing Elements and Planning for Housing](#).
- [HB 1241](#) changed the periodic update cycle described in [RCW 36.70A.130\(5\)](#). Jurisdictions required to complete their updates in 2025-2027 are still required to submit prior to June 30th of their respective year. Additionally, jurisdictions that meet the new criteria will be required to submit an implementation progress report five years after the review and revision of their comprehensive plan.
- [HB 1717](#) added new requirements to [RCW 36.70A.040](#) (subsection 8) regarding tribal participation in planning efforts with local and regional jurisdictions.
- [SB 5275](#) amended [RCW 36.70A.070\(5\)\(d\)](#) enhancing opportunity in limited areas of more intense rural development (LAMIRDs).
- [SB 5593](#) added a new section to [RCW 36.70A.130\(3\)](#) regarding changes to planning and/or modifying urban growth areas (UGAs).
- [HB 1181](#) added the requirement for a climate element in comprehensive plans for fully planning jurisdictions (subsection 9 of [RCW 36.70A.070](#)), including at minimum a resilience sub-element and, depending on the jurisdiction's size, a greenhouse gas emissions reduction sub-element.

State and regional outcomes:

- Meet Growth Management Act (GMA) requirements for the Plan update as outlined in [RCW 36.70A.130](#), [WAC 365-196](#) and the [Department of Commerce Periodic Update Checklist for Fully-Planning Counties](#); and
- Consistency with the Clallam Countywide Planning Policies; and
- Update the Clallam County Critical Areas Ordinance (CAO) consistent with updated Best Available Science (BAS); and
- Update development regulations to ensure consistency with updated policies

Local outcomes:

- Create a user-friendly, easy to navigate, yet comprehensive document
- A robust public engagement program that uses multiple virtual and in-person methods
- Policies that meet state and regional requirements through the lens of local circumstances and emergent issues (e.g. housing affordability)
- Adopted growth targets which reflect planned growth during the planning period
- Goals and plans that are aspirational yet rooted in fiscal responsibility
- Protection of the environment and taking reasonable steps to address climate change
- Housing for all community income levels
- Develop strategies or action items that guide County initiatives, programs, and development regulations
- Create a vision that guides and leverages public and private investment

Project Team Workplan Objectives/High Level Schedule

A detailed project schedule is provided in Appendix A of this Charter and is intended to provide additional direction and specificity for upcoming project tasks. However, we want to remain flexible and to adjust as the project moves forward. The following are high-level work plan objectives the project team will work to adhere to as the project moves forward. The goal is to accept that there may be changes to the schedule, but to also outline upfront how we will work through them together so they can be mitigated. The following is agreed to.

1. The project team will work together to ensure the project is to be completed no later than June 30, 2025, unless additional funding from Commerce is made available for work through December 31, 2025.
2. Modifications to the project scope, especially those which could impact the project schedule, may only be approved by the County Project Manager.
3. Those leading tasks will review the project charter and agree to the project schedule. Schedule changes should be made upfront for issues that we should be able to anticipate now.
4. Personnel changes for task assignments will be communicated to the County Project Manager.
5. Discussion and decisions on important project tasks and deliverables will be made at designated project meetings. Those responsible for project tasks agree that prioritizing project meetings is important and that if attendance does not occur, decisions on agenda items will be made in their absence.
6. Project risks and mitigation for those risks have been identified. When unanticipated issues arise that could impact the project schedule, they will be brought forward to the County Project Manager immediately.

Project Organization/Internal Communication

Successful projects are often built on a strong communication plan. The primary contacts for the county and consulting firms are identified in the tables on pages 8 and 9. These individuals will be primarily responsible for communication and coordination on behalf of the county and consultant team. It is important to identify the way work will be completed by teams, checked for quality assurance, and shared with others.

The following methods will be utilized for coordination between the County departments and consulting team to ensure coordination between deliverables.

- **Project update meeting** – Update meeting will be held every two weeks (unless deemed unnecessary). It will include designees from the County and consulting firms. Other members of the project team will join depending on the meeting topic. These will be held by video conference (MS Teams).
- **Internal Review Team meeting** – The County Project Manager, relevant consultant team members, and deliverable leads from County departments will meet monthly. This meeting will focus on:
 - Reviewing the project schedule
 - Receiving updates as necessary on project tasks
 - Reviewing project deliverables, where appropriate
 - Discussing upcoming deliverables and project tasks
- **Individual coordination** – County and consultant team members will meet individually on tasks as needed to coordinate on deliverable development. The primary contacts for each deliverable are identified in the tables on pages 8 and 9 and within the project schedule in Appendix A.

It is also important that coordination takes place as documents are reviewed by the County.

- **Draft document sharing** – Draft documents between the consulting firms and County will be sent via email. A SharePoint site will be established by the consultant for file sharing of large files and document control of draft and final deliverables.
- **Project Task Tracker** - A short task tracker based on the project schedule will be developed and updated bi-weekly by the project leads so that the County Project Manager is continually updated on the status of each deliverable. This will provide status updates on current tasks. Color-coded tasks and task status symbols will be used to communicate the status of tasks and important aspects that need to be addressed to keep the project on schedule.

Project Schedule

The following is a general outline of project actions, timeframes, and deliverables. A complete project schedule is in Appendix A. The full consultant scope of work for this project is contained within Appendix B.

Actions	General Timeframe	Deliverables
Project Administration	March 2024 – December 2025	✓ Project Kick-off Meeting ✓ Project Charter (work plan) – finished by August 2024 ✓ Engagement Plan – finished by July 2024 ✓ Ongoing collaboration meetings
Review & Update Comprehensive Plan (Including Subarea Plans)	June 2024 – December 2025	✓ Commerce Checklist ✓ Land Capacity Analysis ✓ Housing Needs Assessment and Gap Analysis ✓ Climate Change/Equity/Displacement – in coordination with Cascadia ✓ Policy Recommendations ✓ Draft and Final Comp Plan Element Revisions ✓ Future Land Use Map ✓ Sewer/Water Development Plan ✓ Capital Facilities Plan
Critical Areas Ordinance	May 2024 – January 2025	✓ Critical Areas Checklist and gap analysis ✓ Review of Best Available Science ✓ County drafts code amendments prior to December 2025
Review & Update Development Regulations	May 2024 – December 2025	✓ County leads regulation updates; consultant team technical review and identification of deficiencies
Implementation Matrix and Public Review	January 2025 – December 2025	✓ Create new Implementation Matrix ✓ Public Participation and Outreach Summary Report ✓ BOCC Review and Adoption Hearing - See Task 1.4

Critical Areas Analysis – Best Available Science Report

1. Introduction

1.1 Report Purpose

This review of the best available science (BAS) was compiled to support Clallam County's Critical Areas Ordinance (CAO) update. As a requirement of the Washington State Growth Management Act (GMA) cities and counties must "include the 'best available science' when developing policies and development regulations to protect the functions and values of critical areas and must give 'special consideration' to conservation or protection measures necessary to preserve or enhance anadromous fisheries"¹ (WAC 365-195-900). Regulated critical areas include wetlands, critical aquifer recharge areas, fish and wildlife habitat conservation areas, frequently flooded areas, and geologically hazardous areas (RCW 36.70A.030 and CCC 27.12).

BAS means the current and best available information that follows a valid scientific process as specified in WAC 365-195-900 through WAC 365-195-900. According to WAC 365-195-905, characteristics of a valid scientific process include peer review, standardized methods, logical conclusions and reasonable inferences, quantitative analysis, proper context, and references. Common sources of scientific information include research, monitoring, inventory, modeling, assessment, and synthesis (WAC 365-195-905). BAS literature reviews are a synthesis of the current scientific body of knowledge, and only resources that meet these requirements are included as reference materials for this BAS.

The BAS review is a resource for critical area management but is not intended to provide definitive answers for all policy and regulatory decisions. Policy and regulations should incorporate BAS but also necessitate decision-making processes based on societal values. Additionally, ecological systems are highly complex, and the scientific body of knowledge is constantly evolving with the advancement of new research and technology. Despite these advancements, there are limits to the current state of science and certain topics may not be fully understood. Where there is scientific disagreement in the literature about a particular subject, this review presents a range of potential ideas, theories, or findings. In accordance with WAC 365-195-920, decision-makers may opt for a precautionary, or no-risk approach, when scientific information is incomplete.

The GMA now requires CAOs to incorporate and evaluate the effects of climate change on each type of critical area. Climate change is anticipated to have a profound influence on natural systems and inclusion of these topics allows decision-makers to respond by incorporating climate resilience into policy and regulations.

This BAS review serves as a reference for Clallam County for planned CAO updates, a component of comprehensive updates to the unified development code. Following the establishment of this BAS

¹ Anadromous refers to fish or fish species that spend portions of their life cycle in both fresh and salt waters, entering fresh water from the ocean to spawn.

review, a gap analysis will be developed to identify current shortcomings and provide recommendations on critical area regulation updates.

2. Critical Aquifer Recharge Areas (CARAs)

2.1 Definition

Critical aquifer recharge areas (CARAs) are defined in the Washington Administrative Code (WAC) 365-190-030 as follows:

Critical aquifer recharge areas "are areas with a critical recharging effect on aquifers used for potable water, including areas where an aquifer that is a source of drinking water is vulnerable to contamination that would affect the potability of the water, or is susceptible to reduced recharge."

The Clallam County Code (CCC) 27.12.610 classifies CARAs as follows:

All Clallam County lands and shorelands shall be classified as having either a high, moderate or low aquifer recharge potential. At a minimum, classification shall be based on soil permeability and recharge potential as described within the soil survey of Clallam County. Where adequate information is available, aquifer recharge potential shall be further classified based on the recharge potential of surficial geologic materials, presence or absence of restrictive layers, surface and ground water monitoring data, well head protection areas, depth to ground water, topography (i.e., slopes), and locally adopted ground water protection plans and studies.

The Clallam County designation specifies that lands and shorelands classified as high aquifer recharge potential and aquifer susceptibility possess a critical recharging effect on aquifers used for potable water. These areas are delineated on maps available from the Clallam County Department of Community Development. CARA areas may also be designated due to special circumstances, including areas with a high level of susceptibility or vulnerability to contamination, or known well head protection areas for Class A water systems. A well head protection area is the surface and subsurface area surrounding a well or well field that supplies a public water system through which contaminants are likely to pass and eventually reach the water well(s) as designated under the Federal Safe Drinking Water Act.

Critical Areas Analysis – Gap Analysis

1. Introduction

With passage of the Growth Management Act (GMA), local jurisdictions throughout Washington State, including Clallam County (County), were required to develop policies and regulations to designate and protect critical areas. Critical areas, as defined by the GMA (Revised Code of Washington [RCW] 36.70A.030(5)), include wetlands, areas with a critical recharging effect on aquifers used for potable water, fish and wildlife habitat conservation areas, frequently flooded areas, and geologically hazardous areas.

An ongoing requirement of the GMA is for local jurisdictions to periodically review and evaluate their adopted critical areas policies and regulations. In accordance with the GMA, the County last completed a comprehensive update of its critical areas policies and regulations in 2004. The County is now required to update its critical areas policies and regulations by December 31, 2024. This includes the requirement to include the best available science (BAS). Any deviations from science-based recommendations should be identified, assessed, and explained (Washington Administrative Code [WAC] 365-195-915). In addition, jurisdictions are to give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries. A BAS document for this code update has been prepared separately (Facet 2024).

The County's critical areas policies are codified in Clallam County Code (CCC) Title 31-Comprehensive Plan, Title 27-Environment (Specifically 27.12-Critical Areas), Title 32-Floodplain Management and Title 35-Clallam County Shoreline Master Program (SMP).

This gap analysis provides a review of the current critical areas regulations, noting gaps where existing regulations may not be consistent with BAS or the GMA. It also makes recommendations for improvements to general aspects of the CAO such as clarity, consistency, ease of use etc. The primary intention of this gap analysis is to help guide the update of the County's critical areas policies and regulations.

1.1 Document Organization

Recommendations for updating the County's existing critical areas regulations are provided in Sections 2 through 7. Section 2 addresses the general provisions that are applicable to all critical areas; Sections 3 through 7 address the different types of critical areas covered by the GMA. To highlight findings of the gap analysis, a Code review summary table is provided at the beginning of each section. Where a potential gap is identified, subsections provide further discussion.

2. General Provisions

This section addresses code sections that are applicable to all types of critical areas. This includes CCC 27.12.010-27.12.070. A summary of recommended updates is provided in Table 1.

Table 1. General provisions review summary.

Code Section	Title	Review Comment / Recommendations	Reason for Recommendation
27.12.010	Statement of purpose and authority	Consider adding <i>no net loss</i> terminology.	Consistency with GMA and BAS.
27.12.015	Statement of policy	No changes required.	
27.12.020	Policy goals	No changes required.	
27.12.025	Applicability	Clarify relationship to SMP.	Clarity.
27.12.030	Regulated uses and development activities	No changes required.	
27.12.035	Activities not regulated by this chapter – exemptions	1- Recommend that exemptions be consistent with all of Chapter 27. 2- Recommend after-the-fact permit. 3-Review of emergency work. Recommend cap on area of vegetation removal.	1- Consistency. 2- Consistency with GMA. 3- Consistency with GMA and BAS.
27.12.037	Alternative standards for existing, ongoing agriculture in and adjacent to aquatic habitat conservation areas (ACHA) and wetlands	1- Ensure consistency with Chapter 27 and GMA. 2- Update rating system and buffer guidance. 3- Consider implementing Voluntary Stewardship Program (VSP).	1- Consistency. 2- Consistency with GMA and BAS. 3- Consistency with GMA and BAS.
27.12.040	Pre-existing uses	Clarify definitions for pre-existing structures and timeframes.	Clarity.
27.12.045	Review authority requirements	No changes required.	
27.12.050	Official designation of critical areas	Recommend requiring certified wetland professionals and other professional requirements for analysis.	Consistency with GMA and BAS.
27.12.055	Enforcement	No changes required.	
27.12.060	Warning and disclaimer	No changes required.	
27.12.065	Severability	No changes required.	
27.12.070	Conflict	No changes required.	

Table 2. Wetland provisions review summary.

Code Section	Title	Review Comment / Recommendations	Reason for Recommendation
27.12.200	Applicability and purpose	Recommend updating policy to reflect current Ecology definitions and adding <i>no net loss</i> verbiage.	Consistency with GMA and other regulations.
27.12.205	Regulated uses and activities	No changes required.	
27.12.210	Classification and designation	Recommend updating delineation manual to currently accepted USACE manual and regional supplements and ranking system to Washington State Wetland Rating System for Western Washington: 2014 Update, Version 2.0	Consistency with GMA and BAS.
27.12.215	Protection standards for regulated wetlands	1- Recommend modifications to buffer regulations including widths, measurement, uses and variances. 2-Recommend modifying hazard tree definition.	1- Consistency with GMA and BAS. 2- Consistency with ISA standards.

4. Aquatic and Wildlife Habitat Conservation Areas

This section addresses code sections that are applicable to aquatic and wildlife habitat conservation areas (Fish and Wildlife Habitat Conservations Areas). This includes CCC 27.12.300-27.12.325. A summary of recommended updates is provided in Table 3.

Table 3. Aquatic and Wildlife Habitat Conservation Areas (AWHCAs) provisions review summary.

Code Section	Title	Review Comment / Recommendations	Reason for Recommendation
27.12.300	Applicability and purpose	No changes required.	
27.12.305	Regulated uses and activities	1- Recommend standardized stream classifications per DNR. 2- Modify designation of Class I WHCA.	1- Consistency with BAS and GMA. 2- Clarity and consistency with GMA.
27.12.310	Classification and designation	No changes required.	

Code Section	Title	Review Comment / Recommendations	Reason for Recommendation
27.12.315	Protection standards for aquatic habitat conservation areas	1- Recommend further defining OHWM. 2- Recommend considering riparian management zones per WDFW guidelines.	1- Clarity. 2- Consistency with GMA and BAS.
27.12.320	Protection standards for Class I wildlife habitat conservation areas	No changes required.	
27.12.325	Protection standards for Class II wildlife habitat conservation areas	No changes required.	

5. Geologically Hazardous Areas

This section addresses code sections that are applicable to Geologically Hazardous Areas (GHAs). This includes CCC 27.12.400-27.12.855. A summary of recommended updates is provided in Table 4.

Table 4. Geologically hazardous areas review summary

Code Section	Title	Review Comment / Recommendations	Reason for Recommendation
27.12.400	Applicability and purpose	No changes required.	
27.12.405	Regulated uses and activities	No changes required.	
27.12.410	Classification and designation	Expand classification and designation to include mines and minerals. Reference DNR GIS portal.	Consistency with DNR guidelines.
27.12.415	Landslide hazard protection	Clarify buffer vs. critical area distance related to new development.	Clarity. Consistency with DNR guidelines.
27.12.420	Erosion hazard protection standards	Expand protection measures.	Consistency with DNR guidelines.
27.12.425	Seismic hazard protection standards	No changes required	
27.12.855	Geologic hazardous areas-Special requirements.	No changes required.	

6. Frequently Flooded Areas (FFAs)

This section addresses code sections that are applicable to Frequently Flooded Areas (FFAs). This includes CCC 27.12.500-27.12.515. The CCC is consistent with BAS and therefore, no changes are recommended at this time.

Table 5. Frequently flooded areas review summary

Code Section	Title	Review Comment / Recommendations	Reason for Recommendation
27.12.500	Applicability and purpose	No changes required.	
27.12.505	Regulated uses and activities	No changes required.	
27.12.510	Classification and designation	No changes required.	
27.12.515	Protection standards for certain development proposals	No changes required.	

7. Critical Aquifer Recharge Areas (CCC 27.12.600-615)

This section addresses code sections that are applicable to Critical Aquifer Recharge Areas (CARAs). This includes CCC 27.12.600-27.12.615. A summary of recommended updates is provided in Table 6.

Table 6. CARAs provisions review summary.

Code Section	Title	Review Comment / Recommendations	Reason for Recommendation
27.12.600	Applicability and purpose	No changes required. Section addresses potable water and surface water/recharge areas.	
27.12.605	Regulated uses and activities	BAS and GMA referenced in 27.10.101. Clear links to performance standards and permitting. Recommend adding table of regulated activities for clarity.	Clarity.
27.12.610	Classification and designation	Classification and designation align with WAC and Ecology Guidance. Edit to say, “maps available through Clallam County GIS Portal” and provide link and instructions to see layer. Provide rating of CARA on GIS layer.	Clarity. Consistency with Ecology and GMA guidelines.
27.12.615	Performance standards for certain development activities	Add table and clearer language regarding permitted and exempt activities and uses.	Clarity. Consistency with SMP.

7.1 Regulated Uses and Activities (27.12.605)

7.1.1 Clarify and consolidate regulated activities

CCC 27.12.605 refers to other sections of code with links including the General Provisions (Part 1), Performance standards for certain development activities (27.12.615), regulated uses and development activities (27.12.030) and permit application requirements (27.12.700). The regulated activities section is brief and internal links work; however, it is difficult to look at the regulated activities and code pages. Regulated uses and development activities (CCC 27.12.035) and activities not regulated by this chapter-exemptions (CCC 27.12.035) are clearly defined, however the difference between these and the regulated activities in CARAs is somewhat confusing. Consider rewriting regulated activities section to

include all activities regulated concerning CARAs with set performance standards to ensure protection of CARAs. Consider adding a table similar to Table 5 for further clarification of regulated activities.

Table 7. Regulated activities.

Regulated Activity	Applicable Regulations	Additional Comments
Aboveground/Underground Storage Tanks or Vaults	WAC 173-303, WAC 360	Regulated activities in CARAs
Agriculture		Regulated activities in CARAs
Land Divisions	CCC Title 29	Regulated activities in CARAs
Land Disturbing Activities	Stormwater Management Manual for Puget Sound Basin	Regulated activities in CARAs
Solid or Hazardous Waste Disposal Facilities	CCC Title 33 and 35	Regulated activities in CARAs
Parks, Schools, and Recreation Facilities	CCC Title 33 and 35	Regulated activities in CARAs
Storm Water Standards for Commercial and Industrial Uses	WAC 173-303, Stormwater Management Manual for Puget Sound Basin	Regulated activities in CARAs
Utility Transmission Facilities	WAC 173-303	Regulated activities in CARAs
Sewage Effluent and Sludge Disposal	WAC 246-272	Regulated activities in CARAs and in Part 1 General Provisions
Zoning and Comprehensive Plan Amendment	SEPA	Regulated activities in CARAs and in Part 1 General Provisions
Building permits	CCC Title 33 and 35	Regulated activities in Part 1 General Provisions
Public water system permit	CCC Title 33 and 35	Regulated activities in Part 1 General Provisions
Zoning conditional use or variance	CCC Title 33 and 35	Regulated activities in Part 1 General Provisions
Shoreline permit	CCC Title 33 and 35	Regulated activities in Part 1 General Provisions
Land divisions and related actions under CCC Title 29	CCC Title 33 and 35	Regulated activities in Part 1 General Provisions
Road approach permit	CCC Title 33 and 35	Regulated activities in Part 1 General Provisions
Stormwater and/or clearing grading	CCC Title 33 and 35	Regulated activities in Part 1 General Provisions

Economic Development Policies Analysis

MEMORANDUM

To: Clallam County

From: Joel Farias and Sophie Gartland
Kimley-Horn and Associates, Inc.

Date: May 1, 2025

Subject: DRAFT Economic Development Policies

INTRODUCTION

Historically, the Olympic Peninsula and Clallam County's extensive forests and coastline provided a strong economic foundation in the forest products, maritime, and fishing industries. However, job losses in the forest products sector (previously offering high wages) have reduced overall labor demand. Geographic isolation and inadequate infrastructure further challenge business growth. Despite these obstacles, Clallam County possesses valuable assets that can be leveraged for economic development. To reflect the evolving economy, updates to the Economic Development Element policies are required as part of the Clallam County Comprehensive Plan Periodic Update.

Clallam County completed its Comprehensive Plan in 1995. The 2025 update will serve as a 20-year roadmap guiding future growth, character, and development. This update also fulfills county requirements under the Washington State Growth Management Act (GMA).

The Economic Development Element of a Comprehensive Plan is a mandatory component under RCW 36.70A.070 that establishes local goals and identifies policies, programs, and projects to foster economic vitality. The GMA supports statewide economic development in alignment with comprehensive plans, aiming to create opportunities for all residents, especially unemployed and disadvantaged individuals, while ensuring growth remains within the capacity of natural resources, public services, and public facilities.

The Clallam County Economic Development Council (EDC) developed an Economic Development Plan from May 2021 through December 2022 to address economic development strategies, forecasts, and historical trends. This report assesses existing economic conditions and presents actionable recommendations. The plan's policies were informed by an EDC Community Survey highlighting challenges for working residents, economic impacts by industry cluster, and barriers to growth.

Similarly, the Olympic Peninsula Tourism Master Plan (2024-2029) outlines a five-year strategy to create a more consistent, sustainable, and vibrant year-round visitor economy, particularly increasing visitor spending in spring, fall, and winter. The plan focuses on three key areas:

- Destination marketing
- Destination and community development
- Public-private sector alignment



Findings from both the EDC Plan and Tourism Master Plan have guided updates to the Economic Development policies, ensuring alignment with regional priorities and economic realities. Incorporating these plans, alongside port and city comprehensive plans, promotes regional cohesion and a forward-looking economic strategy for Clallam County.

References

The following documents formed the basis of this review and methodologies:

- [Clallam County Code](#)
- [Clallam County Comprehensive Plan](#)
- [Clallam County EDC, Economic Development in Clallam County, 2023](#)
- [Olympic Peninsula Tourism Master Plan, 2024](#)
- [Port Angeles Comprehensive Plan, 2017](#)

ECONOMIC DEVELOPMENT FINDINGS

The following data was collected to assess historical and current employment and industry trends:

- **Employment analysis (2002-2022):** Examined changes in total jobs, worker demographics (age, race, ethnicity, education, and sex), earnings, and occupational shifts by NAICS industry sector (OnTheMap Census data).
- **Olympic Workforce Development employment projections:** Analyzed industry trends using Employment Security Department/DATA.
- **Household income trends:** Collected U.S. Census five-year estimates on retirement and supplemental security income (SSI) in 2010, 2020, and 2023.
- **Workforce activity:** Assessed active workforce by age group based on U.S. Census five-year estimates for 2010, 2020, and 2023.
- **Land-use policies:** Examined allowed, conditional, and prohibited uses for commercial and industrial zones via Clallam County Code Chapters 33.15 and 33.17.
- **Conditional Use Permits:** Reviewed permit types issued between 2020 and 2024.

The above data, key prosperity trends and industry barriers from the EDC Plan, and regional goals outlined in the Olympic Peninsula Tourism Master Plan were analyzed to identify patterns. These findings directly informed the policy revisions.

METHODOLOGY

To ensure the Economic Development Element accurately reflects current economic conditions and future opportunities, a structured methodology was used. The following steps were taken to guide the process:

- Assessing staff goals, feedback, and engagement.
- Collecting workforce and industry data to identify any patterns and trends.
- Connecting data findings with insights from the EDC and Tourism Master Plan.
- Using collective findings to shape new policies and policy revisions.

Transfer of Development Rights Program Analysis



Formerly DCG/Watershed

TECHNICAL MEMORANDUM

Date:	June 12, 2025
To:	Bruce Emery, Director, Clallam County Department of Community Development Tim Havel, Deputy Director, Clallam County Department of Community Development
Cc:	Dan Nickel, Director, Long Range Planning (Facet)
From:	Donna Keeler, Senior Planner; Alex Capron, Senior Planner; Matt Covert, Senior Planner/Project Manager
Project Name:	Clallam County Comprehensive Plan Periodic Update
Facet Number:	2401.0469.00

Analysis of Clallam County's Transfer of Development Right's Program

WHAT IS A TRANSFER OF DEVELOPMENT RIGHTS PROGRAM? ¹

Transfer of Development Rights (TDR) is a program that facilitates and promotes the voluntary sale of the right to develop all or a portion of a property (the "sending site") to a party that is eligible to develop another property ("receiving site") more intensively than would otherwise be allowed. Sending areas are properties that a community determines it wants to conserve, such as farms, forestland, or wildlife habitat. Receiving areas are properties a community determines are better suited for locating additional growth and/or density, often in urban areas. Receiving areas typically have adequate infrastructure and services to accommodate increased growth.

In response to public concerns about growth and impacts of development, between 1990 and 2010, numerous jurisdictions in Washington State adopted TDR programs to address the loss of forests, farms, wetlands, wildlife habitat and overall quality of life. The concept expanded statewide in 2008 when the Washington State Legislature directed the creation of a regional TDR program in Central Puget Sound focusing on King, Kitsap, Pierce and Snohomish Counties and the 71 cities within their boundaries.

A TDR program can benefit both parties. Landowners of sending sites can sell their development potential of their property while retaining ownership and continuing to use the land for other purposes, such as farming, agriculture and forestry. Purchasers of the development rights gain

¹ Bratton et al (2009)

additional development incentives for projects in receiving areas that typically would not be allowed, such as additional density, or height.

Three main features of a TDR program include that it is:

1. Voluntary. Transactions take place between willing buyers and sellers.
2. Market-based. Individual property owners, developers, or other parties may freely negotiate prices for the purchase and sale of development rights.
3. Flexible. Jurisdictions can customize the element of the program to reflect their conservation and development objectives and the market condition and growth patterns of their particular area.

CLALLAM COUNTY'S TRANSFER OF DEVELOPMENT RIGHTS PROGRAM

On July 28, 1998, the Clallam Board of County Commissioners adopted Ordinance 643 establishing a Transfer of Development Rights (TDR) program, codified under Clallam County Code (CCC) Chapter 33.26. The purpose of the program was to encourage the conservation of long-term commercially significant lands in the Sequim-Dungeness Regional Planning Area by allowing owners of such lands to realize the equity in the land's development potential without conversion to non-agricultural uses. The ordinance also sought to protect critical areas within the Port Angeles Regional Planning Area by allowing owners of such lands to realize the equity in the land's development potential without conversion to non-agricultural or non-forestry related uses. Lastly, the ordinance sought to encourage appropriate growth in urban areas.

To date, Clallam County's TDR program has not been used (in other words, no development has occurred on any receiving sites that utilized the transfer of development rights provisions). The reasons for this lie primarily with a lack of demand and market for purchasing TDR credits from receiving areas to be used by developers in exchange for increased density within the Sequim and Port Angeles sending areas prescribed within CCC 33.26.070. The TDR program also may have inadequate incentives for development density increases.

As a relatively slow-growing county, a significant number of parcels still exist within the receiving sites found within Port Angeles and Sequim that are undeveloped or underdeveloped. Sequim and Port Angeles, while both experiencing growth, may need the receiving areas refined or updated in coordination with each city's current zoning and future land use maps to re-establish these areas as good candidates for desired growth.

Conversely, unlike Puget Sound jurisdictions and their successes described below, Clallam County has seen an overall decline in both population growth trends over the past 20 years, especially in the employment sector. Per Figure 12 of the Clallam County Demographic Profile (May 2024) less growth has occurred over the past decade when comparing 2000 - 2010 and 2010 - 2020.

Fast-growing counties such as King and Snohomish Counties in the Puget Sound region have multiple municipalities utilizing the TDR program, driven in-part by a strong employment sector. Reasons for these successes that Clallam County may consider are described below.

TDR SUCCESS

Washington Department of Commerce TDR guidance (<https://www.commerce.wa.gov/growth-management/ecosystem-planning/tdr/>) provides success stories of jurisdictions that have established exchange rates valuing land in the UGA or city higher to increase willingness by developers to participate, receiving additional dwelling units per acre, floor area, and height. Clear TDR credit minimum criteria to establish eligibility for qualifying as a potential sending site, as well as allocation rates for formulating buildable acreage (not to include critical areas, for example) and formulas where a 20 acre zoning formula results in one dwelling unit per five acres in rural areas, resulting in a 100 acre property being eligible for 20 TDR credits (100 divided by five), or 20 development rights.

In 2013, City of Seattle entered an interlocal agreement with King County. [PLACEHOLDER – MORE INFO TO COME HERE]

CLALLAM COUNTY'S CONSERVATION FUTURES PROGRAM

Unlike the TDR program reliant on market conditions and overall development demand to exceed standard zoning allowances, the Conservation Futures program establishes a clear link between open space and resource lands and funds these development right purchases via a variety of statewide and local levee systems. The success of this program stems from multiple parties working towards a common goal in conservation districts, land trusts, tribes, and the landowners themselves furthering the County's adopted priorities for the, *"Preservation of Viable Producing Farmlands within Clallam County as per Definition in RCW 84.34.020 Preservation of Viable, but currently non producing Farmlands in Clallam County"* As adopted in December of 2021, effective until December 2030.

Conclusion

The County should consider a one-year feasibility period, engaging with Commerce to develop potential fixes for its unused TDR program. If no success or utilization remains, the County may be better served repealing CCC Chapter 33.26 and leveraging existing successes, such as the Conservation Futures Program.

Housing Element Technical Analysis

1 Introduction

The Clallam County Comprehensive Plan Periodic Update must be acted upon by the Board of County Commissioners before December 31, 2025.

Comprehensive plans are required to comply with the procedural and substantive requirements of RCW 36.70A. Substantively, the elements of the comprehensive plan must comply with RCW 36.70A.070 (and .080 for optional elements). HB 1220, which was signed into law in 2021, amended the GMA to instruct local governments to “plan for and accommodate” housing affordable to all income levels. This significantly strengthened the previous language, which was that local governments must “encourage” affordable housing.

1.1 Housing Element Requirements

The statute amendment also directed Commerce to project future housing needs for jurisdictions by income bracket and made significant updates to how jurisdictions are to plan for housing in the housing element of the comprehensive plan. Per these amendments, the Housing Element must now include:

- **Planning for sufficient land capacity for housing needs**, including all economic segments of the population (moderate, low, very low and extremely low income, as well as emergency housing and permanent supportive housing).
- **Providing for moderate density housing options within Urban Growth Areas (UGAs)**, including but not limited to duplexes, triplexes and townhomes.
- **Making adequate provisions for housing for existing and projected needs for all economic segments of the community**, including documenting programs and actions needed to achieve housing availability.
- **Identifying racially disparate impacts, displacement, and exclusion** in housing policies and regulations, and beginning to undo those impacts; and identifying areas at higher risk of displacement and establishing anti-displacement policies.

This memo provides details on Clallam County’s response to all these requirements. Commerce provides guidance on preparing various comprehensive plan elements and step-by-step instructions in how to demonstrate that the land capacity analysis identifies sufficient capacity of land to accommodate all projected housing needs during the twenty-year planning horizon:

- Establishing Housing Targets for Your Community: County-level considerations for housing planning (July 2023)
- Guidance for Updating Your Housing Element: Updating your housing element to address new requirements (August 2023)

12 Development of Housing Allocations

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 (next page).

Overall, Clallam County must plan for and accommodate 1,849 permanent housing units in the unincorporated areas in its jurisdiction from the 2020 baseline through 2045, plus capacity for 76 emergency housing beds.

This report documents how Clallam County is providing capacity for permanent and emergency housing allocations by income bracket in accordance with published Commerce guidance.

	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/Sekiu 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	<u>0</u>	<u>0</u>	<u>0</u>	<u>124</u>	<u>44</u>	<u>34</u>	<u>812</u>	<u>0</u>	<u>1014</u>
Total:	<u>1667</u>	<u>751</u>	<u>1520</u>	<u>733</u>	<u>258</u>	<u>196</u>	<u>843</u>	<u>440</u>	<u>6408</u>

Table 1. HAPT Tool Methodology C Output, Clallam County.

Notes: Due to rounding in the tool output, the totals for individual jurisdictions may differ from the subtotals by one housing unit. PSH means Permanent Supportive Housing.

2 Land Capacity Analysis

2.1 Summary

Clallam County has completed a land capacity analysis as part of the comprehensive plan update. Capacity is provided in terms of net acres and net units by UGA.

2.2 Step 1: Summarize land capacity for housing production by zone

The LCA summarizes housing capacity by zone under current zoning for each UGA (reproduced here).

Climate Element Draft

Chapter X

COMPREHENSIVE PLAN CLIMATE ELEMENT

Introduction

Purpose and Background

Clallam County (County) is developing a Climate Element as a part of the 2025 Comprehensive Plan update, while aligning efforts with an update of the County's 2019 Multi-Jurisdictional Hazard Mitigation Plan. The Climate Element (CE) meets new Washington House Bill 1181 requirements for cities and counties to integrate climate mitigation and/or resilience policies into their periodic comprehensive plan updates. Clallam County is required to satisfy a climate resilience sub-element for its 2025 Comprehensive Plan. This effort is aligned with the update to the Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), which provides a framework for Clallam County to reduce vulnerability to natural and human-caused hazards, including climate change.

GMA Requirements

Washington's Growth Management Act (GMA) requires quickly growing Washington cities and counties to develop comprehensive plan elements that respond to challenges associated with population growth. Amended in 2023 by House Bill 1181, the GMA now requires integrating climate policies into comprehensive plan updates.

The goal of HB 1181 is to ensure that comprehensive plans:

- adapt to and mitigate climate change;
 - reduce greenhouse gas (GHG) emissions and per capita vehicle miles traveled (VMT);
- prepare for climate impact scenarios;
- foster resiliency to climate impacts and natural hazards;
- protect and enhance environmental, economic, and human health and safety; and advance environmental justice.

Commerce led a multiyear project to develop model element guidance, which provides steps and pathways to integrate both a climate resilience and mitigation sub-element into a comprehensive plan, either as a set of integrated policies or standalone element. Jurisdictions are encouraged to assess their climate impacts and risks, seek input from key stakeholders and communities, and pursue pathways that modify existing or create new policies to address GHG emissions and increase community resilience.



For Clallam County, these required policy changes must address the Resilience Sub-Element requirements to consider climate impacts and increase resilience across local sectors. Clallam County is not required to address requirements in the GHG Emissions Reduction Sub-Element at this time. The County's 2025 Comprehensive Plan update will incorporate a Climate Element aligned with Commerce guidance, existing County climate policies, and policies to foster sustainable and equitable planning in the face of climate change.

Resilience Sub-Element Overview

Following the steps and pathways outlined by Commerce's Climate Element Guidance, Clallam County has exceeded the minimum requirements of HB 1181 by incorporating at least one climate resilience goal and supportive policy for each climate-exacerbated hazard relevant to the jurisdiction. The Resilience Sub-element must include measures to mitigate natural hazards exacerbated by climate change and adapt to unavoidable impacts.

Specifically, policies must:

- **Requirement 1:** Address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire, and other effects of changes to temperature and precipitation patterns;
- **Requirement 2:** Identify, protect, and enhance natural areas to foster climate resilience, as well as areas of vital habitat for safe species migration; and,
- **Requirement 3:** Identify, protect, and enhance community resilience to climate impacts, including social, economic, and built-environment factors, which support adaptation to climate impacts consistent with environmental justice.

Commerce also encourages the county to address all 11 priority sectors through its climate resilience sub-element goals and policies. This helps to ensure that resilience measures enhance co-benefits such as local food security and green job creation, while also addressing significant areas that may not be covered in the city's hazard mitigation plan.

Priority sectors include:

- Ecosystems
- Transportation
- Water Resources
- Buildings & Energy
- Agriculture & Food Systems
- Waste Management
- Zoning & Development
- Emergency Management
- Economic Development
- Cross-cutting
- Human Health
- Cultural Resources & Practices



Climate Planning Context

This Element has been developed in accordance with state Growth Management (GMA) goals and is coordinated and integrated with other Elements of the Comprehensive Plan. Clallam County has an extensive history in investing in planning efforts around climate action and resilience, including development of the Clallam Climate Action Plan in 2022, NODC Climate Change Preparedness Plan in 2015, and local planning efforts such as the 2019 Port Angeles Climate Resilience Plan and 2018 Jamestown S'Klallam Climate Adaptation Plan. The Climate Element of the Comprehensive Plan builds off prior efforts by adopting climate change goals and policies for the county while also complying with new GMA requirements.

This Element builds on past planning efforts by strengthening existing goals and policies, where needed, and addressing identified gaps with new goals and policies. The Element also seeks to include an impactful mix of policies customized to Clallam County's unique geographic and community context.

This Element uses the best available science and guidance to understand and address Clallam County's key climate risks and opportunities. Because climate change is a cross-sectoral topic, this chapter is intended to integrate with and complement goals and policies in other related Comprehensive Plan Elements, such as Housing, Transportation, Resource Lands, and Environment and Open Space.

Countywide Planning Policies

The Growth Management Act requires interjurisdictional coordination and development of county wide policies for the protection and promotion of environmental quality. The Countywide Planning Policies (CWPPs) are a regional framework for comprehensive planning for the county, cities, and towns within Clallam County and were first adopted in 1992 and will be updated with the 2025 Comprehensive Plan update. The Climate Element aligns with the CWPPs, which broadly focus on preserving the County's unique quality of life while fostering sustainable growth. This includes protecting air and water quality, preserving historic communities, and diversifying the economy to support jobs, healthy downtowns, and affordable housing. Key elements include vibrant, livable urban areas with accessible services, a strong, diversified economy with ample job training opportunities, and a sustainable, multimodal transportation system. The county also aims to protect natural systems, maintain rural character, and ensure a responsive government that collaborates with citizens and other entities to meet community needs.

Regional Planning Efforts

Climate issues cross jurisdictional boundaries, so a regional planning approach can be effective to address climate challenges. Clallam County has a history of partnership and



regional collaboration with cities and Tribes to address climate change, with examples including:

- Clallam County's Multi-jurisdictional Hazard Mitigation Plan (2024, updated simultaneously)
- Clallam County's Climate Action Plan (2023)
- Makah Hazard Mitigation Plan (2023)
- Lower Elwha Klallam Tribe (LEKT) Climate Vulnerability Assessment (2022)
- Natural Disaster Resiliency Planning on the North Olympic Peninsula (2022)
- Building a Resilient Peninsula Through Local Conservation (2020)
- Port Angeles Climate Resilience Plan (2019)
- Jamestown S'Klallam Tribe Vulnerability Assessment and Adaptation Plan (2018)
- Climate Plan for the Quileute Tribe of the Quileute Reservation (2017)
- Sequim Resolution Adopting Policies that Improve the City's Sustainability and Resiliency (2016)
- Climate Change Vulnerability Assessment for the Treaty of Olympia Tribes (2016)
- Climate Change Preparedness Plan for the North Olympic Peninsula (2015)
- Adapting to Climate Change at Olympic National Forest and Olympic National Park (2011)

This Element includes goals and policies aimed at fostering and strengthening such collaborations and partnerships.

Existing Conditions

Climate Vulnerability and Resilience in Clallam County

Clallam County is already experiencing climate change impacts like warmer temperatures, more frequent and intense rainfall and less snow in winter, increased drought in summer, and riverine and coastal flooding. Some examples of recent extreme weather events include flooding, such as during extreme winter storms in 2018 (Hawkins, 2018) and on the Bogachiel River, cutting off the Quileute Tribe. Additional events include the heat dome of summer 2021 linked to two deaths in Clallam County (Washington Department of Health) and wildfires in 2022 on the Makah reservation, which led to evacuations (KOMO News Staff, 2022).

Without ambitious greenhouse gas (GHG) reduction measures across the region and globe, Clallam County is expected to experience the following impacts (North Olympic Peninsula Resource Conservation & Development Council, 2022).

