

AGENDA

Clallam County Planning Commission

Planning Commission Meeting of Wednesday, August 20, 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:** July 16, 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:** 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:
Bruce Emery, Director; Donella Clark, Principal Planner

MINUTES

Clallam County Planning Commission

Meeting of July 16, 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 Chair Steve Gale, Vice-Chair Ron Long, Ken Reandeau, Katina Hester, Warren Billups, Tom Butler, and Bonnie Booth. Jane Hielman joined later in the meeting after the roll call. Bruce Emery, Director and Tim Havel, Deputy Director, represented staff from the Department of Community Development.
- D. WELCOME: Chair Gale welcomed all in attendance.
- E. APPROVAL OF MINUTES: Commissioner Reandeau motioned to approve the minutes with Commissioner Hester seconding. Motion passed with one abstention.
- F. ANNOUNCEMENTS: None.
- G. PUBLIC COMMENT PERIOD: Ed Bowen opposes the process of the Comprehensive Plan and the new terminology being used. Wondered where the consultants were and why they did not attend this joint meeting. Need the County to deal with the transportation arterial flow and work on that during the Comprehensive Plan Update.
- H. UNFINISHED BUSINESS: None.
- I. PUBLIC HEARING ITEM: None.
- J. WORK SESSION ITEMS: Director Emery welcomed the Planning Commission and Board of Commissioners to the joint work session on the Comprehensive Plan. Provided a briefing of the findings from the two consultants working for the County and what remains. Cascadia Group provided a Hazard Mitigation Plan and provided recommendations of the changes needed in the Comprehensive Plan regarding the Climate element. Facet NW are the consultants helping with the legislative changes, the "have to's" to remain compliant with the Growth Management Act. The consultants conducted a gap analysis and best available science and have provided recommendations for changes necessary to remain compliant. Reports were provided in the packet.

Some of the changes proposed include the need for Agricultural lands to be held to the Critical Area buffers. Current regulations provide for a reduction if property is enrolled in a program for reduced buffers, but there are currently no properties enrolled. There is a suggestion to implement a voluntary stewardship program administered by the Conservation District that has been successful in other jurisdictions. The Wetland Rating System needs to be updated utilizing Ecology's system. Some modifications to the buffer widths and definitions of hazard trees will be required. The Best Available Science also indicates that buffers themselves are unique habitats and need to be treated differently; changes may be required. Aquifer Recharge Areas will be requiring an update for performance standards. The current code has some performance standards, but these will be revised and expanded. DCD is talking with the City of Port Angeles to increase the urban growth area to increase opportunities for economic development. May try to swap some industrial lands in the UGA of Clallam Bay/Seki with areas west of Port Angeles. Discussing the idea of increasing density in the Sequim UGA instead of relying on the transfer development right program that has not been used since its inception. The Lands Capacity Analysis looked at the bare minimum of housing needs and found deficiencies in the City of Sequim. There is not enough designated lands for the lowest income brackets and emergency housing. Clallam Bay/Seki also does not meet the requirements for

density, which may require an increase in zoning. Due to all the changes the County will likely need to do a supplemental EIS and analyze any impacts of this increased zoning on transportation facilities and utilities. Climate element is a new section that will require updates in the Comprehensive Plan. The Planning Commissioners and Board of Commissioners asked questions and discussed the transfer development right program, talked about housing, and how Recompete will fit into the Comprehensive Plan.

Director Emery provided results of the community survey. 464 respondents provided comment regarding strengths and weaknesses of the community and the common themes presented. People commented that better access to healthcare is needed, need for childcare, more jobs, better code enforcement for RV's, more access off the peninsula, too much money spent on sheriff and police. The Sequim Valley Airport commented they would like to have more commercial activities at the airport. Regional mobility is a concern with only one road in and out of the peninsula.

Next steps will be to present the gap analysis to the public at a number of public meetings to receive comments on the necessary changes and also to hear aspirational themes. Staff report and recommendations of draft plan will hopefully be available at the August 6, 2025 meeting.

- K. PUBLIC COMMENT PERIOD: Ed Bowen commented that he was discriminated against and was not asked about arterial flow. The DCD Director should also not be judging the themes of the public survey and should just use the raw data. The consultants need to look into the rural/urban codes that deal with the transit systems and commute times.
- L. DISCUSSION OF PUBLIC COMMENTS: None.
- M. GOOD OF THE ORDER: None.
- N. ADJOURNMENT: The meeting adjourned at __7:52_ 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: August 13, 2025
To: Clallam County Planning Commission
From: Bruce Emery, Director of Community Development
Re: Planning Commission CPU Work Session, August 20, 2025

The work on the Comprehensive Plan Update (CPU) is in full swing. Staff has been working at incorporated and responding to key issues raised by the consultants with a focus on integrating all recommendations into a Public Hearing Draft set of documents. We hope to provide you with an update and timeline for completion of this process by next Wednesday's meeting.

Public Meetings

Planning Division staff completed its round of public outreach meetings for the Comprehensive Plan Update (CPU) on July 30th. In total, there were five public meetings: Clallam Bay Library (7/17/25), Joyce Crescent Grange (7/22/25), Guy Cole Center in Sequim (7/23/25), Forks City Hall (7/24/25), and Port Angeles Library (7/30/25). Although we would have preferred a larger turnout, the discussion and engagement was productive. A summary of issues and concerns expressed during each meeting is included in this packet.

Comments Response and Policy Recommendations

Staff has compiled a summary of all public comments received to date, including those raised during the public outreach meetings, articulated as part of the online survey, and those written comments received on a regular basis throughout the CPU process. Included in your packet is a table that includes the summarized comments, recommendations on possible policy changes in response, and an explanation of the recommendation or lack thereof. This information will be the primary focus of next Wednesday's work session, so I encourage you to review the comments and our recommended response. Based on the progress of the work session and your direction, these policies (or modified versions) will be incorporated into the Public Hearing Draft.

Modified Schedule

Our original meeting schedule has already been modified out of necessity. A recommended revised schedule includes the following:

- 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
- 10/1/25, Planning Commission Public Hearing, 6:00 pm
- 10/15/25, Planning Commission work session, 6:00 pm

Our hope is that the Planning Commission will conclude its review by mid-October and forward their recommendation to the BOCC by that time. I realize this doesn't leave much time for review of the range of issues presented, but it is what we have to work with. With the exception of the GMA-compliance issues, one or more items could be docketed for consideration in 2026, leaving more room to work through the mandatory topics. We can discuss this matter more thoroughly next Wednesday.

What's Next?

As noted, staff will continue the assembly and integration of the consultant's recommendations, and as directed by the Planning Commission, the policy responses to public comments. As we proceed through this process, staff will be prepared and extended SEPA Checklist which will be incorporated into future work sessions once complete. We do foresee that the Transportation and Capital Facilities Elements will be delayed a few weeks, but the consultants are working hard to complete that work. These will also be incorporated into the Public Hearing Draft once available.

As part of the upcoming work sessions, we will also want to make time to consider issues and concerns Planning Commissioners would like to see addressed in the CPU. I recommend you be prepared with these items if you are so inclined to. We will continue to update our web page with changes to our draft documents, periodically, at: <https://www.clallamcountywa.gov/1842/Comprehensive-Plan-Update>

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 Comprehensive Plan Update
Public Outreach Meeting, Clallam Bay Library, July 17, 2025, 6:00 PM**

The meeting began at approximately 6:05 PM, with six (6) people in attendance. Staff provided a presentation on the updated requirements of the Growth Management Act, the work the consultants have prepared as a recommendation for meeting the requirements of the GMA, and the proposed schedule of public meetings, work sessions and hearing before the Planning Commission. The following summarize issues raised by the attending public:

- A question was raised regarding the legal basis of the Department of Commerce's authority to review local CPUs. Staff responded that authority is found under WAC 365-196.
- The need for maintaining transportation arterial flow throughout Clallam County was raised. Specifically, it was noted that past suggestions on developing a bypass for the City of Port Angeles in order to address congestion has not been pursued. It was suggested that a bypass or similar alternative be explored for the wellbeing of the community and to facilitate economic development. Blyn and possibly Forks were also cited as potential future barriers to transportation flow. The Bonneville Power Easement corridor was identified as a possible route.
- Alternative/emergency access routes should be developed for the North Coast (SR 112 to Neah Bay), including the development of an alternative route from Forks to Neah Bay.
- It was suggested that the sewer treatment facility for Clallam Bay/Seki be relocated away from the shoreline as a resiliency and emergency management measure.
- It was suggested that the increasing costs of doing business should be considered when developing policy for commercial forestry.
- It was suggested that barging and marine transportation be strengthened as a means of facilitating industrial business operations in Clallam County—citing that one barge can carry as much product as 205 trucks.
- Clallam County should consider incentives and disincentives to address the proliferation of second-home and investment home vacancies.

The meeting was concluded at approximately 7:30 PM.

Clallam County Comprehensive Plan Update
Public Outreach Meeting, Joyce Crescent Grange, July 22, 2025, 6:00 PM

The meeting began at approximately 6:02 PM, with twelve (12) people in attendance. Staff provided a presentation on the updated requirements of the Growth Management Act, the work the consultants have prepared as a recommendation for meeting the requirements of the GMA, and the proposed schedule of public meetings, work sessions and hearing before the Planning Commission. The following summarize issues raised by the attending public:

- This issue of HipCamp (commercial campgrounds) was raised. Commentors spoke in favor of the campgrounds, indicating they owned and operated one for many years without issue. Fire concerns were expressed as one issue that might be addressed through controls, such as fire pit density standards and clear zones.
- Community bicycle access to the Discovery Trail was expressed as a priority. The commentors noted that with younger people, vehicle ownership is down, especially with the expansion of e-bike use. Safe bicycle access to community and regional trail corridors is important.
- It was noted that road design standards should reflect rural character and needs, limiting the width and scope of road dimensions. It was expressed that wider streets promote speeding.
- Concerning *no net loss*, it was suggested that standards should provide clarity as to what it means and how it is applied.
- The question was raised whether the five subregional planning boundaries within Clallam County should be modified.
- It was questioned whether trails should have a separate process from the 6-Year Transportation Improvement Plan (TIP) process, as it pits prioritizing trails against road improvements and maintenance.

The meeting concluded around 7:20 PM.

**Clallam County Comprehensive Plan Update
Public Outreach Meeting, Guy Cole Center, July 23, 2025, 6:00 PM**

The meeting began at approximately 6:00 PM, with eleven (11) people in attendance. Staff provided a presentation on the updated requirements of the Growth Management Act, the work the consultants have prepared as a recommendation for meeting the requirements of the GMA, and the proposed schedule of public meetings, work sessions and hearing before the Planning Commission. The following summarize issues raised by the attending public:

- It was expressed that no growth should be allowed; the rural character of the County is why they moved here.
- With reference to SR 101, it was expressed that one road in/one road out is problematic.
- The Sequim Bypass project was referenced as a good start for regional arterial flow. The emerging choke-points of Palo Alto road and Blyn suggest we should be planning for bypasses to these areas as well.
- It was suggested that disincentives, such as increased taxes, be applied to properties with vacant homes to help stimulate housing stock.
- Concern was expressed over the acquisition of private lands by area Tribes and then not having to abide by zoning or other land use regulations.
- It was suggested that the County implement protections for manufactured home parks to protect elderly and low-income tenants from change of use resulting in evictions.
- Concern was expressed that families could no longer simply divide their property to leave equal parts to their children, resulting in younger people leaving the area.
- It was expressed that the tightlining of irrigation ditches was causing harm to area aquifers and the County should enforce against it under the Critical Areas Ordinance.
- It was suggested that the County's consulting team be available during public meetings for questions and answers.

The meeting concluded around 8:03 PM.

**Clallam County Comprehensive Plan Update
Public Outreach Meeting, Forks City Hall, July 24, 2025, 6:00 PM**

The meeting began at approximately 6:00 PM, with four (4) people in attendance. Staff provided a presentation on the updated requirements of the Growth Management Act, the work the consultants have prepared as a recommendation for meeting the requirements of the GMA, and the proposed schedule of public meetings, work sessions and hearing before the Planning Commission. The following summarize issues raised by the attending public:

- Concern was expressed regarding the amount of critical areas that prevented development from offering. It was noted that less than 30% of the County was shown to contain critical areas.
- It was noted that the tourism industry is very important to Clallam County. The commentor noted that Clallam County should allow commercial campgrounds outright in all rural zones, and the conditional use permit process is too onerous.
- It was noted that a reliable source of potable water is difficult to find in the west-end of the County.
- It was suggested the County allow a campground to operate for two years and then require a conditional use permit only if issues arise.

The meeting concluded around 7:25 PM.

Clallam County Comprehensive Plan Update
Public Outreach Meeting, Port Angeles Public Library, July 30, 2025, 6:00 PM

The meeting began at approximately 6:05 PM, with ten (10) people in attendance. Staff provided a presentation on the updated requirements of the Growth Management Act, the work the consultants have prepared as a recommendation for meeting the requirements of the GMA, and the proposed schedule of public meetings, work sessions and hearing before the Planning Commission. The following summarizes issues raised by the attending public:

- Concern was expressed over the cost and onerous requirements of the CUP process for development a commercial campsite. The commentor identified several benefits HipCamp and similar private campgrounds provide the region, including preservation of the natural environment, open space, and contributing to the tourism industry. Discussions over possible prescriptive standards and thresholds for primitive campgrounds were discussed.
- The use of private cisterns as a means of supplementing fire suppression efforts by rural fire districts was supported.
- Concern was expressed whether changes to the Comprehensive Plan could render formerly-issued conditional use permits invalid. Staff provided assurance that once issued and the use maintained, a CUP remains vested for the duration of the use, regardless of changes in zoning.
- Concern was expressed that, given the breadth of issues covered in the Comprehensive Plan, adequate time for Planning Commission and BOCC review was not provided, and changes should be adopted requiring a minimum Two-year review process for a CPU. The commentor noted that metrics were needed and reporting required under CCC 31.08.200(12) had not been provided.
- Concern was expressed that studies conducted and provided to Clallam County approximately ten years prior indicated multiple properties at risk of sea level rise and wildfire risk. The commentor mentioned that eastern Clallam County ranked fifth in the state concerning risk of catastrophic loss due to wildfire. The commentor noted that with that knowledge, the DCD had an obligation to provide notice to title to alert landowners to the risk, and that the County should map these areas of concern.
- Concern was expressed regarding Canada's use of the Strait of Juan de Fuca for transport of oil sands crude—citing that it is heavier than water and could result in catastrophic ecosystem loss should a spill occur.
- It was suggested that the Comprehensive Plan be considered expansive with regard to other jurisdictions and should be integrated with regional and international issues that impact Clallam County.
- Concern was expressed that public funding should be devoted to the extension of urban services (sewer, water, power, etc.).

- Additional support for HipCamp and private for-profit campgrounds, reiterating concerns that the CUP process is too expensive and onerous.
- Concern was expressed that the final recommendation of the Consultants concerning the Transportation Element should be afforded a public discussion opportunity.
- With regard to consideration of expanding industrial land base, the Maritime Program being offered at Peninsula College should be coordinated with that effort as commercial sea transport works in tandem with, and is a synergistic component of, industrial development and growth.

The meeting concluded around 7:35 PM.

Clallam County Comprehensive Plan Update

Public Comments and Corresponding Recommendations

August 12, 2025

The following summarizes issues raised during the public engagement and outreach efforts taken by Clallam County as part of its 2025 Comprehensive Plan Update (CPU). Efforts included several private and public community event presentations, an online survey which ran from December 26, 2024, through March 24, 2025, and public engagement meetings held in Clallam Bay (7/17/25), Joyce (7/22/25), Sequim (7/23/25), Forks (7/24/25) and Port Angeles (7/30/25). Public testimony has been invited throughout the CPU process, originating in June 2024. The following summary identifies the issues raised, and if a policy is warranted, a draft policy for consideration. Nothing in this document is intended to restrict the Planning Commission or Board of County Commissioners from considering any and all reasonable alternatives. All comments received have been retained by Clallam County as part of the record for the CPU.

Comment/Issue	Recommended Policy/Amendment	Staff Notes
1) Need for maintaining transportation arterial flow throughout Clallam County, including bypass for the City of Port Angeles, Palo Alto intersection, Blyn, and possibly Forks in order to address congestion, for the wellbeing of the community and to facilitate economic development. The Bonneville Power Easement corridor was identified as a possible route.	Existing Policy: CCC 31.02.420(1)(c)(ii). Review need for new <u>or alternative</u> highway alignment to improve circulation and regional mobility in the Port Angeles subregion. <u>Observe and track potential regional congestion points along the SR 101 corridor throughout Clallam County, and plan for new highway corridors and bypass alternatives as needed to address congestion and maintain arterial flow and efficient regional mobility.</u>	Comment at public outreach meeting, 7/17/25. Current policy appears to limit concern regarding regional mobility on SR 101 to the Port Angeles area. The proposed language will expand this concern to all areas that pose a risk of congestion and impacts to regional mobility.
2) Alternative/emergency access routes should be developed for the North Coast (SR 112 to Neah Bay), including the development of an alternative route from Forks to Neah Bay.	Recommend amending existing Policy CCC 31.02.420(1)(c)(iii). <u>Pursue</u> Review the <u>development</u> of need to have a new highway connection from Neah Bay to Ozette along or near the coast.	Comment at public outreach meeting, 7/17/25.
3) Consideration should be given to relocating the sewer treatment facility for Clallam Bay/Seki away from the shoreline as a resiliency and emergency management measure.	Proposed Climate Goal 3: Promote building retrofits and new construction that is sustainably built to minimize environmental impacts and enhance resilience against extreme weather and other risks exacerbated by climate change.	Comment at public outreach meeting, 7/17/25. Proposed language of Goal 3, Climate Element, addresses the concern of this comment.

4) Policy and regulatory approaches to managing commercial forestry should carefully consider the present costs of doing business in forestry (e.g. land, equipment, transportation, labor, etc.).	Recommend a new Subsection 31.02.140(5): <u>Development of policy and regulatory approaches to managing commercial forest lands should carefully consider present and ever-changing costs of conducting commercial forest operations, including land, equipment, labor, regulatory compliance, and transportation. Where feasible, regulations should be crafted to facilitate commercial forestry and avoid presenting a barrier to the same.</u>	Comment at public outreach meeting, 7/17/25.
5) Barging and marine transportation should be strengthened as a means of facilitating industrial business operations in Clallam County as a cost- and logistically-effective alternative to trucking.	Recommend a new subsection CCC 31.02.420(2)(iv): <u>Explore the siting of a new marine barging facility within the Clallam Bay/Seki UGA to establish and facilitate industrial marine transport.</u>	Comment at public outreach meeting, 7/17/25.
6) Clallam County should consider incentives and disincentives to address the proliferation of second-home and investment home vacancies, and to restore adequate rental stock.	Recommend a new subsection CCC 31.02.283(3)(h): <u>Consider implementation of incentives and disincentives, such as special tax initiatives, to facilitate second-home and out-of-area owners providing their homes for medium and long-term rental opportunities.</u>	Comment at public outreach meeting, 7/17/25 .
7) HipCamp (commercial campgrounds) is strongly supported by some residents, who own and operate a facility without issue. Fire concerns were expressed as one issue that might be addressed through controls, such as fire pit density standards and clear zones.	Recommend adding the following to subsection CCC 31.02.620(1)(j)(iv): • <u>Standards should be considered for recreational uses in rural areas, including limited camping facilities along non-motorized trails such as the Olympic Discovery Trail, and commercial outdoor oriented activities:</u> ○ <u>Standards for buffering and landscaping to ensure compatibility with surrounding rural land uses shall be accomplished.</u> ○ <u>Standards for noise, traffic, light, and glare, and other nuisance characteristics.</u> ○ <u>Such uses shall be located on a minimum parcel size of five acres.</u>	Comment at public outreach meeting, 7/22/25. Sequim and Port Angeles Regional Plans (CCC 31.03.270(8) and .04.260(6)(c), respectively) call for development of operational standards for private campgrounds, setting a minimum lot size of five acres. Straits and West End CPs do not specifically mention campgrounds but generally support outdoor-oriented recreational uses with reasonable conditions to minimize nuisances and impacts. Recommend standardizing policy under the Countywide Comprehensive Plan to establish broader consistency and direct implementation of standards and thresholds.

8) Community bicycle access to the Discovery Trail is supported as a priority. The commentors noted that with younger people, vehicle ownership is down, especially with the expansion of e-bike use. Safe bicycle access to community and regional trail corridors is important.	Recommend amending existing Policy 31.02.420(5)(c): A system of lateral/feeder routes should connect Highway 101 to the Olympic Discovery Trail. <u>Additional lateral routes should be explored and developed to provide expanded connectivity between residential areas, community features, and the Olympic Discovery Trail.</u>	Comment at public outreach meeting, 7/22/25.
9) Road design standards should reflect rural character and needs, limiting the width and scope of road dimensions. It was expressed that wider streets promote speeding.	No policy recommendation.	Comment at public outreach meeting, 7/22/25. Clallam County has adopted by Ordinance the City and County Design Standards for the Construction of Urban and Rural Arterial Collectors (1999, per RCW 35.78.030 and RCW 43.32.020). The Standards incorporate AASHTO standards, making the County eligible for State and Federal Funding for road maintenance and safety improvement implementations. Reducing road dimensions below the design criteria would harm the County's ability to maintain this needed funding.
10) Concerning <i>no net loss</i> , it was suggested that standards should provide clarity as to what it means and how it is applied.	No policy recommendation.	Comment at public outreach meeting, 7/22/25. Staff agrees that clear communication on the meaning of the term should be provided, however, this is appropriate for consideration under the required updating of the CAO and not necessarily the CPU.
11) The question was raised whether the four subregional planning boundaries within Clallam County should be modified.	No Policy Recommendation.	Comment at public outreach meeting, 7/22/25. Although the boundaries of the four Subregional Planning Areas should be evaluated from time-to-time, the topography, intervening state and federal ownerships, and other community identity factors suggest that the current planning boundaries continue to accurately function to divide the County into convenient sub-regional units appropriately situated for the development of specific land use policies crafted according to local needs specific to each geographic location.
12) It was questioned whether trails should have a separate process from the 6-Year	No policy recommendation.	Comment at public outreach meeting, 7/22/25. Matter was discussed with the Deputy Public Works Director. Although trail

Transportation Improvement Plan (TIP) process, as it places prioritizing trails with road improvements and maintenance.		facilities are allocated through the 6-Year Transportation Improvement Plan (TIP) along with road projects, the two do not typically compete directly for the same funding sources. Trails are required under the GMA as part of the multi-modal transportation facility requirement, and establishing priority projects through the TIP is an effective way of determining priority projects.
13) It was expressed that no growth should be allowed; the rural character of the County is why people move here.	No policy recommendation.	Comment at public outreach meeting, 7/23/25. The requirements of the GMA mandate that we plan for growth, not preempt it. No policy recommendation is advised. Protection of rural character is achieved under the GMA with rural land use and zoning designations to create a framework that allows for growth while maintaining rural character.
14) With reference to SR 101, it was expressed that one road in/one road out is problematic. The County should explore multiple access points to the Peninsula.	Recommend amending proposed Policy 10.1, Climate Element: Explore options for designing new and expanded roads and multiuse pathways to minimize impacts on shorelines, accommodate sea-level rise, preserve ecological functions, and avoid disrupting water-related uses, public access, and habitat restoration. Identify roads and bridges vulnerable to flooding and landslides and collaborate with the Washington State Department of Transportation (WSDOT) to improve resilience of assets outside the County's jurisdiction, <u>including identification of alternative access corridors within and outside of Clallam County's jurisdiction to create redundancies for emergency preparedness and to increase connectivity between the Olympic Peninsula and the rest of Western Washington. This will include Wworking</u> with cities and Tribes to map infrastructure and create agreements for alternate transportation routes in parks, private lands, and Forest Service roads to ensure public safety and emergency access.	Comment at public outreach meeting, 7/23/25. Recommended language to specifically address connectivity between Peninsula and rest of Western Washington.

15) The Sequim Bypass project was referenced as a good start for regional arterial flow. The emerging choke-points of Palo Alto road and Blyn suggest we should be planning for bypasses to these areas as well.	No policy recommendation.	Comment at public outreach meeting, 7/23/25. Proposed edits to CCC 31.02.420(1)(c)(ii), Comment 1, above, already address the concerns of this comment.
16) It was suggested that disincentives, such as increased taxes, be applied to properties with vacant homes to help stimulate housing stock.	No policy recommendation.	Comment at public outreach meeting, 7/23/25. This issue was already addressed above.
17) Concern was expressed over the acquisition of private lands by area Tribes and then not having to abide by zoning or other land use regulations.	No policy recommendation.	Comment at public outreach meeting, 7/23/25. The acquisition of land by local tribal communities and conversion to tribal trust status is well within the protected and sovereign right of the tribal entities. No policy recommendation is warranted.
18) It was suggested that the County implement protections for manufactured home parks to protect elderly and low-income tenants from change of use resulting in evictions.	No policy recommendation.	Comment at public outreach meeting, 7/23/25. Although concern does exist with respect to existing mobile home parks being converted to another use, establishing a regulatory prohibition on conversion is feared to create a disincentive for the development of needed low-income housing through creation of new manufactured home parks or other housing.
19) Concern was expressed that families could no longer simply divide their property to leave equal parts to their children, resulting in younger people leaving the area.	No policy recommendation.	Comment at public outreach meeting, 7/23/25. Fundamental to the GMA is that only rural densities (one home/five acres and less) be allowed in rural areas and only urban densities (at least 4 homes/acre) be allowed in urban areas. Outside of LAMIRDs, anything in between is considered sprawl and is prohibited.
20) It was expressed that the tightlining of irrigation ditches was causing harm to area aquifers and the County should enforce against it under the Critical Areas Ordinance. Petition signatures signed by 73 signatories.	No policy recommendation.	Comment at public outreach meeting, 7/23/25. The Dungeness Valley Irrigation tightlining project was originated within the WRIA 18 Watershed Plan. A Final Environmental Impact Statement was issued for the project in November 2003. The project is sponsored by the Washington Department of Fish & Wildlife, is considered a watershed restoration project in accordance with RCW

		89.08.460(2)(c), and possibly a fish enhancement project in accordance with RCW 77.55.181. Local permit authority is preempted by RCW 77.55.181(3)(a) and RCW 89.08.470. Further, since it was originated by the WRIA 18 Watershed Plan, Clallam County does not oppose the project in any way as it addresses the illicit withdrawal of waters of the Dungeness.
21) It was noted that the tourism industry is very important to Clallam County. The commentor noted that Clallam County should allow commercial campgrounds outright in all rural zones, and the conditional use permit process is too onerous and should not be required.	No policy recommendation.	Comment at public outreach meeting, 7/24/25. As noted earlier (Comment 7), draft policies have been proposed to strengthen the possibility of prescriptive standards and thresholds for private commercial campgrounds throughout the County. That policy recommendation addresses the concerns expressed here.
22) It was suggested the County allow a campground to operate for two years and then require a conditional use permit only if issues arise.	No policy recommendation.	Comment at public outreach meeting, 7/24/25. See responses to Comments 7 and 21, above.
23) Concern was expressed over the cost and onerous requirements of the CUP process for development a commercial campsite. The commentor identified several benefits HipCamp and similar private campgrounds provide the region, including preservation of the natural environment, open space, and contributing to the tourism industry. Discussions over possible prescriptive standards and thresholds for primitive campgrounds were discussed	No policy recommendation.	Comment at public outreach meeting, 07/30/25. See responses to Comments 7, 21 and 22, above.
24) The use of private cisterns as a means of supplementing fire suppression efforts by rural fire districts was supported.	No policy recommendations	Comment at public outreach meeting, 07/30/25. Use of cisterns for potable water or other purposes (fire flow) are administered by the Environmental Health Division and not the DCD. It is not necessary for a policy regarding their use for fire suppression or otherwise.

25) Concern was expressed whether changes to the Comprehensive Plan could render formerly-issued conditional use permits invalid. Staff provided assurance that once issued and the use maintained, a CUP remains vested for the duration of the use, regardless of changes in zoning.	No policy recommendation.	Comment at public outreach meeting, 07/30/25. Once a Conditional Use Permit is issued, it is vested for the life of the project. No policy changes are warranted.
26) Concern was expressed that, given the breadth of issues covered in the Comprehensive Plan, adequate time for Planning Commission and BOCC review was not provided, and changes should be adopted requiring a minimum Two-year review process for a CPU. The commentor noted that metrics were needed and reporting required under CCC 31.08.200(12) had not been provided.	No policy recommendation.	Comment at public outreach meeting, 07/30/25. In a perfect world, staff would have completed the LCA and other background research well in advance of forwarding any draft recommendations on the CPU, with ample time for consideration. Unfortunately, it was not understood the degree to which GIS had been neglected for the prior 3.5 years, or the true scope of new elements to the LCA as are now required. These setbacks along with setbacks in procuring consultant assistance could not have been fully anticipated. Simply codifying a desired schedule for the CPU could place the process in jeopardy by setting requirements that may or may not be achievable under any range of circumstances. For this reason, staff does not recommend codifying a review schedule. Concerning the reporting parameters identified in CCC 31.08.200(12), this information was established with the first iteration of the Comprehensive Plan under the GMA (1995). At the time, reporting on the identified parameters seemed reasonable and was thought to assist in future CPUs. There was also a fully-staffed Long Range Planning Division at that time, which no longer exists. To our knowledge, complete reporting under this section has not occurred since, and under current staffing, is not going to in the future. It may be preferable to strike this section altogether to eliminate false expectations.
27) Concern was expressed that studies conducted and provided to Clallam County approximately ten years prior indicated multiple properties at risk of sea level rise and wildfire risk. The commentor mentioned that	No policy recommendation.	Comment at public outreach meeting, 07/30/25. The concept has been discussed with Legal Counsel. Notice-to-Title requires certainty in determining the condition. In the Critical Areas Ordinance, Notice-to-Title is a requirement of permit approval based on an accurate determination of the presence of a critical

eastern Clallam County ranked fifth in the state concerning risk of catastrophic loss due to wildfire. The commentor noted that with that knowledge, the DCD had an obligation to provide notice to title to alert landowners to the risk, and that the County should map these areas of concern.		area. As a policy that would simply apply across a broad spectrum of landowners, the Notice would create substantial liability to the County for clouding of title. It is recommended that public outreach and education be favored over Notice-to-Title.
28) Concern was expressed regarding Canada's use of the Strait of Juan de Fuca for transport of oil sands crude—citing that it is heavier than water and could result in catastrophic ecosystem loss should a spill occur.	Recommend amending subsection CCC 31.02.340(15) as follows: The coastline, coastal waters, and upland areas should be protected from the recognized problems and depreciation which could be brought about by oil ports and development associated with an oil port, oil storage, <u>oil or crude transport</u> , and oil pipeline.	Comment at public outreach meeting, 07/30/25. The jurisdictional influence of Clallam County over commercial transport by Canada is limited. However, to the extent that such policy could give Clallam County a voice in addressing safety concerns of crude and oil transports within the Strait of Juan de Fuca, the policy would have positive impact.
29) It was suggested that the Comprehensive Plan be considered expansive with regard to other jurisdictions and should be integrated with regional and international issues that impact Clallam County.	No policy recommendation.	Comment at public outreach meeting, 07/30/25. RCW 36.70A.100 requires that Comprehensive Plans be coordinated with, and consistent with, neighboring city and county jurisdictions. However, the intent of this provision is to ensure that choices made by one jurisdiction do not adversely impact the choices made by another concerning future growth and development. It does not mean, for example, that the plans should be the same or call for the same remedies for identified issues. And while part of the consideration of future planning may involve infrastructure or resources that cross jurisdictional boundaries, there is still a clear limit, tied to the jurisdictional boundary, on the influence one jurisdiction can have over another. Coordinating and influencing common issues is important for all jurisdictions to do. But there is no authority within the GMA that grants a county or city jurisdictional control over another.
30) Concern was expressed that public funding should be devoted to the extension of urban services (sewer, water, power, etc.).	No policy recommendation.	Comment at public outreach meeting, 07/30/25. Commentor did not recommend policy but merely saw it as a funding obligation of the BOCC. Staff informed the commentor that provision of urban services are typically the responsibility of the adjacent city jurisdiction, not Clallam County.

31) Additional support for HipCamp and private for-profit campgrounds, reiterating concerns that the CUP process is too expensive and onerous.	(same as above)	Comment at public outreach meeting, 07/30/25.
32) Concern was expressed that the final recommendation of the Consultants concerning the Transportation Element should be afforded a public discussion opportunity.	No policy recommendation.	Comment at public outreach meeting, 07/30/25. Suggest holding additional public information meetings once transportation and CFP elements are complete.
33) With regard to expanding industrial land base, the Maritime Program being offered at Peninsula College should be coordinated with that effort as commercial sea transport works in tandem with, and supports, industrial development and growth.	Recommend amending subsection CCC 31.02.620(j)(ii): • Recognize and endorse marine services as an economically significant industry in which Clallam County has unique qualities and competitive advantages; Chapter 31.02 CCC, County-Wide Comprehensive Plan Page 219 of 233 The Clallam County Code is current through Ordinance 1021, passed July 9, 2024. • Support the development and maintenance of essential marine infrastructure within the County, including marinas, industry piers, boat ramps and recreational access facilities. • <u>Clallam County should coordinate industrial land base expansion (zoning) with the Peninsula College Maritime Program, to leverage growth in maritime transport/industry with industrial expansion.</u>	Comment at public outreach meeting, 07/30/25. Incorporating the maritime educational program may be an avenue to further leverage the success of the expansion of industrial land base with the transportation opportunities available at the Port of Port Angeles. This is one solution to the added costs of trucking from the Peninsula.
34) Supports identifying (mapping) private forest lands at risk of conversion. Such forests are priorities for set-aside under Natural Climate Solutions account funding (RCW 70A.65.270) or Trust Land Transfer legislation (RCW 79.17.300).	No policy recommendation.	Comments received 5/28/24. RCW 79.17.300 deals with State Trust Lands, which are not likely to ever convert. These lands are already mapped and identifiable. With respect to RCW 70A.65.270, lands likely to convert include all residential zoning districts and mixed residential/forestry. It's unclear of any benefit would be realized by this requested mapping exercise.

35) Concerns were expressed over issuance of recent shoreline permits/exemptions allowing development of bulkheads and similar shore revetments. The letter requests a strategy that protects property and shorelines along Three Crabs Road. The commentors go into great depths the range of environmental and health-related problems that will likely emanate from continued sea level rise and other effects of climate change.	No policy recommendation.	Comments received 3/26/25. The permit issues in question are related to the Clallam County Shoreline Master Program (SMP), promulgated under the Shoreline Management Act, not the GMA. Staff has been working on solutions to the permitting issues encountered. A policy change is not needed and is not appropriate given the legislative source of the regulation; however, this matter will be retained for consideration in the future review and update of the SMP.
36) Recommends including the agricultural accessory use standards under CCC 33.48 be included in the CPU, and that they be extended to farms located within designated UGAs. The commentator cites the requirement for a conditional use permit as unfairly burdensome.	No policy recommendation.	Comments received 5/28/25. The issue of specific agricultural accessory uses is appropriate for review. However, it remains staff recommendation that, due to higher residential densities and the imperative to promote affordable housing, agricultural accessory uses should not be considered a priority within designated urban growth areas. Such uses are still available under a conditional use permit.
37) Supports treating short-term rentals as “cottage industries” to be supported by the Comprehensive Plan.	No policy recommendations.	Comments received 1/22/25. Short-term rentals (STRs) presently provide visitors to the Peninsula opportunity to stay in a range of locations and settings in converted residences and other structures. They provide the landowner opportunity for additional income, and provide the local economy increased spending through tourism. But due to their popularity, they also can be in competition for limited available housing stock. Presently, the Code is neutral on whether they are an asset to be promoted or a detriment to be regulated. When the City of Port Angeles did an analysis of the extent of STRs within city limits, they found that for every STR, there were four vacant homes with out-of-area owners. While staff recommends that the issue be studied further (see recommendations below), we are not in a position to recommend regulatory controls, or to recommend that they be promoted.
38) Supports modifying the Airport Overlay District, Airport Development (Zone 3) to eliminate the restriction of “no human	Recommend amending subsection 31.03.340(8)(d): The County shall ensure the continued viability of the Sequim Valley Airport, including assurance that	Comments received 1/7/25. Staff reviewed WSDOT Airports and Compatible Land Use Guidebook (January 2011) and relevant portions of Federal Aviation Regulations Part 77 (FAR). The

occupation” and support short-term rentals, AirBNBs, and other lodging and service uses affiliated with the Sequim Valley Airport.	adjacent land uses do not cause conflicts with the continued use and maintenance of the airport. <u>This may include exploring the feasibility of expanding allowed uses within the Airport Development (Zone 3) portion of the Airport Land Use Compatibility Overlay to include vacation rentals and other limited lodging services to serve aviation traveling customers.</u>	primary focus of airport planning includes the compatibility of adjacent land uses with the expected noise and operational nuisances associated with airport uses. Secondly, the Airport Overlay District also concerns itself with the uses and intent of the underlying zone—in the case of Sequim Valley Airport, the Agricultural Retention (AR) Zone. However, the Airport Development (Zone 3) area is limited and already contains airport-related facilities. If restricted to this portion of the site, approval of the amended policy would not further intrude into viable agricultural lands but would improve the economic viability and services provided by the airport. Since the services would be provided by the airport to airport clientele, there would be no non-compatibility issues.
39) The Cities and County should coordinate in planning for the UGAs. Is current zoning appropriate to achieve the city’s vision for future annexations? Are the development standards correct?	No policy recommendations.	Comments received 3/10/25. The cities and the County have been in coordination as required under RCW 36.70A.100 and the Countywide Planning Policies. This coordination will continue through the completion of the CPU, development regulations (to be completed within six months of the CPU), and the updating of future service extension and annexation agreements.
40) Supports ordinance enabling low-impact camping on private land. Suggests performance standards for fire safety, noise, sanitation, waste management, and other considerations.	No policy recommendation.	Comments received 7/29/25. See response to Comment 7, above.
41) Supports primitive camping on private property via HipCamp. Includes several resources for communities that have adopted standards and processes for approval.	(Same as above)	Comments received 7/1/25. See response to Comment 7, above.
42) Supports expanded opportunity for “...affordable, transitional, and supportive housing that allows pets and emphasize proximity to health care, transportation, and	No policy recommendation.	Comments received 5/17/25. The increased requirements for housing affordability to all income segments address, in large part, the concerns of this section. Because extremely low, very low and low-income housing (0-80% AMI) are located within cities and

commercial areas.” Options should be varied. Economic opportunity should include unskilled labor and job training for skilled positions. Changing climate should foster consideration of homelessness vulnerability.		UGA's, such housing will be located within proximity to health care, transit, and commercial areas. Climate Policies 5.1, 9.1, 9.3 and 9.4 address homeless vulnerabilities with climate change. Recognizing and supporting education and training for a skilled workforce is also supported under CCC 31.02.610(8)(c).
43) Identifies that the S(DRP) zone has only one business owner and the Department of Ecology, unwilling to sell. No jobs will be created for people who live there.	No formal response at this time.	Comments received 7/1/25. We recognize the practical deficiency expressed in this comment and are working with the City to develop practicable solutions. We will provide them to the Planning Commission once complete.
44) Requests expansion of policies and regulations controlling nighttime light pollution and light trespass. The letter identifies five principles, including: allowing only exterior lighting that is necessary, targeting lighting only where it is needed, allowing exterior light only at levels no greater than necessary, using exterior lighting only where it is needed, and using warm-color lights where possible.	Recommend amending subsection CCC 31.02.340(11)(b) as follows: To reduce light pollution while meeting the needs for public safety, encourage the use of reflectors and appropriate aiming on new outdoor lighting to minimize the upward scattering of light. Performance standards for <u>exteriorcommercial</u> lighting should be developed which minimize night glare and hours of operation at the minimum level to protect property and public safety. <u>Considerations for the development of reasonable standards may include the use of light only when and if it is needed, direct light only where it is needed, control light so it is no brighter than is needed and use warm-color lights where practicable.</u>	Comments received 7/31/25. In addition to protecting dark sky and aesthetic benefits, reasonable standards for exterior lighting also reduces energy usage and minimizes environmental impacts as well. These impacts emanate most profoundly from uncontrolled commercial and industrial development but can also be experienced significantly from residential development.
45) Expressed concern about moisture loss and water resource use (e.g. pumping of ground water) on lands as outpacing glacial melt as leading cause of freshwater discharge to the world's oceans. The correspondence included a link to a report finding the same.	No policy recommendation.	Comments received 8/3/25. Climate Element policies 12.1 through 12.5 and 13.1 address the concerns expressed.
46) Requests inclusion in the County's Climate Vulnerability Assessment. Recognizes Clallam County's service	Recommend amending the Clallam County Climate Vulnerability Assessment (CCCVA) to include the Hoh Nation as socially vulnerable community, including	Tribal comments received from the Hoh Indian Tribe, 2/20/25.

availability as more appropriate given remoteness of western Jefferson County. Recognizes Tribe's vulnerability regarding risks to SR 101. Recognizes Tribe's risk to wildfires given lack of their own fire department. And dependency on PUD #1 of Clallam County as primary power service provider. Requests inclusion summarizing risks to Tribal lands.	common risks affiliated with SR 101, wildfire, power service continuity, and nexus with Clallam emergency response providers. Note that the CCCVA is a plan-document for the updated Hazard Mitigation Plan. Any modification of the CCCVA will be for CPU purposes only, and will not impact the approved Hazard Mitigation Plan.	
47) Provided response of survey of Tribal citizens. Areas of concern include: need for all types of housing for all income levels, including transitional; reduce barriers to economic development in Forks, improve transportation services to Reservation lands; improve internet (broadband) and power service availability and outage response; improve provision of emergency services such as fire response; management of cultural and natural resources especially on timber lands; expand access to land to practice Treaty-reserved rights, including harvesting and hunting; protect & restore habitat degradation from logging; increase the amount of land devoted to cultural preservation and environmental protection; concerns about the range of potential climate change impacts; and the need to move to higher ground due to tsunami threats. Priorities are articulated to closely align with land use, transportation, public utilities, housing, and economic development. Natural environment and cultural resources should be protected.	Housing affordable to all income segments is addressed in the Housing Element of the Comprehensive Plan (CCC 31.02.290-.293) and will mostly impact housing availability within the Forks UGA. Economic development policies are established under CCC 31.02.720. Recommend amending CCC 31.02.420(3)(h) to read: "The supply of transit service shall be consistent with population and employment densities. More service should be provided to urban growth areas and the interconnection of urban growth areas <u>and tribal centers and reservations</u>, than to rural areas." Support for broadband service extension is provided for under CCC 31.02.720(4). Proposed Amendment to CCC 31.02.720(6), below, addresses concerns regarding power service resilience. Improved fire and emergency response are addressed under Climate Policy 8.1, 8.2, and 8.4. Concerns about protection of cultural and natural resources from climate-related risks are addressed under Climate Policy 4.1 and 4.2. Concerns regarding protecting and restoring habitat are addressed under CCC 31.02.340, and specifically under Subsection (7).	Tribal comments received from the Hoh Indian Tribe, 6/20/25.

48) Requesting holistic approach to low-bank shoreline armoring in eastern Clallam County. Concerns cite impacts of hard—armoring on sensitive beach environments subject to drift cell dynamics, and shifting erosion impacts to neighboring properties.	(see comments on same issue, above).	Tribal comments received from the Jamestown S'Klallam Tribe, 3/21/25.
49) Provided response of survey of Tribal citizens. In addition to identifying areas of concern, the response included a series of recommendations: Culverts resulting in fish barriers need to be addressed; Streamflow trends and climate change threaten salmon; invasive species pose a significant concern; Coastal tribes require finding to meet the challenges of climate change; inter-governmental coordination needs to be expanded; proximity and access to shoreline and marine amenities, cultural and natural resources should be protected; development should be appropriately located to avoid impacts; parks and recreational opportunities should be expanded and protected for all users; housing affordable to all income levels should be accelerated in existing urban centers; expand proper commercial siting to increase job opportunity while protecting natural and cultural amenities; Expand emergency, youth, seniors, and parks and recreational services; protect critical infrastructure, expand community engagement, and increase funding for supporting climate resiliency.	Recommend new subsection CCC 31.02.340(1)(f): <u>Clallam County shall prioritize culvert replacement and similar issues that presently result in barriers to fish passage as part of the Six-Year Transportation Improvement Plan (TIP) process.</u> The broad list of other concerns expressed are specifically addressed under CCC 31.02.293, .340, .593, and .620 and Draft Climate Policies 4.1, 4.2, 7.1 through 7.5, and 8.1 through 8.5.	Tribal comments received from the Quileute Tribal Council, 7/2/25. The prioritization of culvert and fish-barrier replacement will not only address identified issues impacting the health and survivability of anadromous fish species but also help to protect the County against legal action that could result without a deliberate prioritization of this issue (see United States V. Washington, Case No. 70-9213). Concerning other issues raised, several existing and proposed changes to the Comprehensive Plan already address the concerns identified.
50) Identified a lack of healthcare access in Forks and Sequim, for certain age groups,	No policy recommendation.	51 Respondents. Medical service facilities are listed as a permitted land use within all commercial zoning districts except Tourist Rural (TR). There exists ample capacity to accommodate existing and

and concerns about the financial stability of OMC.		future facilities. Facility growth and funding adequate for their continued function is a matter beyond the scope of the Comprehensive Plan or development regulations.
51) Need for economic development that supports living wage jobs including ecotourism, agritourism, technology, manufacturing and logging.	Expansion of technology sector policies is provided under Amendment to CCC 31.02.620(1)(j)(v), below. Modifications to the economic development policies of CCC 31.02.620, includes expansion of manufacturing, timber products, maritime and construction—all employment clusters determined by the EDC to include “prosperity-wage jobs.” Support for agrotourism already exists under CCC 31.02.115(5)(b).	39 Respondents.
52) Concerns over lack of childcare facilities and family-friendly activities, family wage jobs, all needed to support young families	No policy recommendation.	30 Respondents. Family day care providers (12 or fewer children) are allowed outright in most residential zones. Child daycare centers (unlimited) are allowed with a CUP in rural zones and allowed outright in all urban zones. Proposed economic policies are intended to integrate recommendations of EDC and NODC and are designed to stimulate business growth in sectors that support family-wage jobs.
53) Support for better Code enforcement for derelict houses, RVs, vehicles and garbage.	No policy recommendation.	16 Respondents. Draft RV Ordinance is in process and is intended to provide Code Enforcement broader tools designed to address proliferation of residential use of RVs and related impacts.
54) Support and opposition expressed for addressing homelessness	No policy recommendation.	14 Respondents claim too many resources devoted, 13 Respondents claim not enough. Housing element (CCC 31.02.280 through .283) is intended to stimulate housing growth in all income brackets, including emergency shelters and emergency housing. Increases in housing stock and available no-cost and low-cost options will help address the concerns of this issue, and are mandated under the GMA.
55) Support for expanded and improved public beach access across the County	No policy recommendation.	13 Respondents. CCC 31.02.340(14) already contains very strong language regarding the identification and development of access

		points to the County's shoreline areas. No further policy is recommended.
56) Concern expressed over Tribal Trust Land removing land base from tax roles	No policy recommendation.	12 Respondents. See comments provided above regarding this issue.
57) Support expressed for Tribal community efforts, such as environmental restoration and community services.	No policy recommendation.	4 Respondents. Tribal partners do play a role in co-managing community resources and the provision of benefits to the broader community for tribal initiatives and community services. No additional policies are necessary for this work and continued collaboration on areas of mutual concern.
58) Concerns expressed over the conversion of farmland, development sprawl, and the need for development to be consolidated within UGAs.	No policy recommendation.	22 Respondents. The concerns expressed in these comments are addressed broadly and specifically under the Land Use, Rural Development and Housing Elements of the Comprehensive Plan. No further policy recommendations are warranted.
59) Support for glass recycling and commercial composting.	No policy recommendation.	10 Respondents. Composting and recycling, although convenient, are not identified under the definition for public services or public facilities (RCW 36.70A.030(32) & (33)). They are typically contracted services with for-profit companies. Currently, glass recycling does not produce a sustainable economic return and is likely not to be reestablished until favorable economic conditions reemerge. They are an available option within most commercial and industrial zones.
60) Support for a free community center that fosters arts and culture.	Recommend amending Section CCC 31.02.620(1)(j)(iv) to include: <u>• Support the development of cultural centers and facilities for the public sharing of the arts and culture, and community events.</u>	7 Respondents. In addition to providing for cultural enrichment via the arts, public places for arts and community gathering also serve to attract tourism and generates economic value.
61) Support for decreasing frequency/duration of power outages on the west end.	Recommend including a new subsection CCC 31.02.720(6) to include: <u>Policy 6. Power and utility service providers should be encouraged to integrate resiliency and redundancy in utility service extension</u>	1 Respondent. Draft language incorporates concern and coincides with recommended Climate Element policies.

	<u>design, where practicable, in order to avoid service outage, disruption, and duration.</u>	
62) Increase transit service frequency and locations to include recreational areas.	No policy recommendation.	16 Respondents. Service routes and other provisions of Clallam Transit are established in the Clallam Transit System Comprehensive Transportation Plan. While the Comprehensive Plan incorporates portions of the Transit Plan, it is not appropriate for scheduling or service areas to be determined in the CPU.
63) Support for commercial passenger air service from Fairchild Int'l Airport to SeaTac and other regional airports.	No policy recommendation.	16 Respondents. CCC 31.02.420(4)(e) already articulates support for a passenger airline carrier to and from SeaTac.
64) Increase service times and expansion of Strait Shot commuter service.	No policy recommendation.	14 Respondents. See response to Comment 63, above.
65) Support for completing the Olympic Discovery Trail.	No policy recommendation.	8 Respondents. The Olympic Discovery Trail is already strongly supported in the Comprehensive Plan (CCC 31.02.415(6), .420(5)(b), and .441).
66) Support for Clallam Transit Free Transit Program and encouraging its continuance.	No policy recommendation.	8 Respondents. See response to Comment 63, above.
67) Support for more dedicated bike lanes on certain rural roads with reduced speed limits.	No policy recommendation.	5 Respondents. CCC 31.02.442 describes multiple bicycle routes along existing collector and arterial roads that provide linkage to SR 101 and the Olympic Discovery Trail along with dimensional criteria for improving safe bicycle access. Several of these projects have not yet been completed but remain a priority given their listing. Reducing speed limits involves a dedicated process including approval by the Board of County Commissioners.
68) Support for additional access points off the Peninsula, and support for bypassing choke points such as Port Angeles.	No policy recommendation.	4 Respondents. See response to Comment 14, above.

69) Support for form-based zoning in UGAs that prioritizes transit mobility, pedestrian and non-motorized access.	No policy recommendation.	4 Respondents. Several of the urban commercial zoning districts allow multi-use, integrated residential and commercial uses. In the more established residential neighborhoods, integrating commercial uses is less than ideal from a neighborhood character and identity standpoint.
70) Support for road and street repairs	No policy recommendation.	3 Respondents. Funding procedures for street repairs are already provided for under CCC 31.02.410.
71) Support for train access to I-5 Corridor	No policy recommendation.	3 Respondents. Train access would be desirable from a transportation and economic development standpoint. Unfortunately, former rights-of-way have been reverted back to private ownership and intervening development make re-establishment of train facilities impracticable.
72) Support for expanded sidewalk development.	No policy recommendation.	3 Respondents. Sidewalk implementation as a condition of new development and as a preferred design feature of public roads is already provided under CCC 31.02.420(5)(f) and (k).
73) Concerns regarding inability to use parks without feeling unsafe from proliferation of homeless people.	No policy recommendation	14 Respondents. The challenges of homelessness are addressed, in part, in the Housing Element and further supported under the Economic Development Element of the Comprehensive Plan. The HHS Five-Year Homelessness Plan also assists with the effort of getting unhoused people housed. Beyond these efforts, vagrant use of public spaces, such as parks, is a matter of law enforcement and not within the scope of the CPU.
74) Support for keeping County parks primitive and natural (undeveloped).	No policy recommendation.	6 Respondents. Development standards and design criteria for County parks are established within the Clallam County Parks and Recreation Comprehensive Master Plan. Although cited as a mandatory element under RCW 36.70A.070, in accordance with Subsection .070(10), and because state funding for the implementation of the Parks Master Plan has not been provided, parks and recreation is not required as part of the Comprehensive Plan. For that reason, there are no corollary policies regarding County parks in the Comprehensive Plan.

75) Support for more public restrooms.	No policy recommendation.	4 Respondents. Restroom facilities affiliated with recreational sites should be the function of the managing agency. This is not the function of the DCD nor is the Comprehensive Plan the appropriate place for consideration on this issue.
76) Support for turning abandoned mills into open space.	No policy recommendation.	4 Respondents. The creation of open space, while providing public benefits, does need to be balanced with other community needs, including economic development. Abandoned mills within residential or resource zoning districts may be good candidates for conversion to open space, while abandoned mills within the limited industrial land base should arguably be made available for reuse or redevelopment in kind in order to expand potential for prosperity-wage jobs.
77) Support for protecting existing trails and forests from logging.	No policy recommendation.	5 Respondents. The Comprehensive Plan recognizes and manages for the multiple users of commercial forest lands, including timber harvesting and recreation, among others (CCC 31.02.130(3)). Because of its importance to the local economy and for revenues to junior taxing districts, timber harvests will continue as valued users of our forest resources. At the same time, the Comprehensive Plan recognizes and supports development of outdoor recreational opportunities "...provided that the recreational activity is compatible with commercial timber harvest (CCC 31.02.140(6))."
78) Support for preservation of shoreline buffers and requiring that structures be moved instead of shore armoring	No policy recommendation.	3 Respondents. Shoreline buffers are managed through the Shoreline Master Program and not the Comprehensive Plan. Current rule making under the Department of Ecology instructs that moving a structure out of harms way is preferable to altering the shoreline environment with bulkheads or other revetments.
79) Support for ADA accessibility and variety in County parks	No policy recommendation.	3 Respondents. As noted earlier, park facility policy is adopted through the Clallam County Parks and Recreation Comprehensive Master Plan and is a focus separate from the CPU.

80) Support for more neighborhood County parks	No policy recommendation.	2 Respondents. As noted earlier, park facility policy is adopted through the Clallam County Parks and Recreation Comprehensive Master Plan and is a focus separate from the CPU.
81) Support for more parking at trailheads.	No policy recommendation.	2 Respondents. As noted earlier, park facility policy is adopted through the Clallam County Parks and Recreation Comprehensive Master Plan and is a focus separate from the CPU. Clallam County has no jurisdiction concerning state and federal parks.
82) Support and opposition to a campground at the proposed Miller Peninsula State Park.	No policy recommendation.	2 Respondents. The likely development of the Miller Peninsula State Park is recognized in the current Comprehensive Plan (CCC 31.03.415(6)(a)). Development of the park should require intersection improvements at Diamond Point Road and SR 101, and along Diamond Point Road (CCC 31.03.415(4)).
83) Demand for County to support skilled trades.	No policy recommendation	8 Respondents. CCC 31.02.610(8) identifies and supports a wide range of business sectors vital to the economic well-being of the County, including building trades, education, finance, forest resources, Health services, information technology, marine services and tourism.
84) Support for more regulation of short-term rentals (STRs), with one asking for reduced regulation of STRs.	Recommend Amending CCC 31.02.281(4) to include a new subsection (k), as follows: <u>Clallam County should coordinate the monitoring of short-term rentals to determine the extent of the number of units operating within the County, and to what extent these units are impacting the price and availability of housing and rental stock.</u>	7 Respondents. There are strong opinions on the issue of short-term rentals (STRs). Many feel their presence substantially increases competition (and price) for limited housing and rental stock. Others see economic benefit through tourism dollars. Whether the situation requires a regulatory remedy depends on the extent of exactly how many units are operating in Clallam County (we don't fully know) and what impact, if any, these units are having with respect to limited, affordable housing. The recommended policy would provide guidance on a path forward.
85) Support for expansion of area grocery stores.	No policy recommendation.	4 Respondents. All but two of all commercial zones allow grocery stores outright. The development of grocery stores are not significantly restricted by regulations but are a matter of economics and demand.

86) Support for promoting Clallam County as a center for climate education and research.	Amend Resilience Sub-Element Overview to incorporate the following: <u>Clallam County is uniquely situated to both hedge against climate change impacts and provide real-time data on the impacts of climate change across all priority sectors. The Olympic Mountains, shorelines and riverine systems, extensive forest resource lands, differences in watershed dynamics and functions, and settlement patterns and built environment, make Clallam County an appropriate location for climate education and research. In recognition of the direct benefits to the community for science-based information, Clallam County should be promoted as a center for climate education and research.</u>	3 Respondents. The benefit to the community would be vetted information on not only climate impacts, but potential recommendations to achieve broader resilience. The Climate Element is divided among 11 priority sectors. However, education and research is a cross-cutting function, impacting all sectors. Suggest the recommended policy statement be incorporated at the end of the Resilience Sub-Element Overview.
87) Support for promoting tech industries in Clallam County	Recommend a new policy, CCC 31.02.620(1)(j)(v): <u>Information and Technology:</u> • <u>Encourage and promote the development of high-tech industries in Clallam County.</u> • <u>Continue to support the extension and completion of broadband service throughout Clallam County.</u> • <u>Encourage and promote industries and businesses that support high-tech industry needs.</u>	2 Respondents. Currently, language supporting high-tech industry development is absent from economic development policies. Increased broadband internet and remote capability holds potential for future tech industry development, which could provide expanded economic opportunity.
88) Opposition to supporting measures towards climate change and climate resiliency.	No policy recommendation.	15 Respondents. The Climate element and corresponding policies are mandated under RCW 36.70A.020(14) and .070(9).
89) Support for prioritizing climate and environment.	No policy recommendation.	7 Respondents. Climate and environmental protection through critical areas policy, regulation, and adoption of the Shoreline Master Program, are already mandated under the GMA and addressed in the Draft CPU.
90) Concerns that climate regulation could make housing construction prohibitively expensive.	No policy recommendation.	5 Respondents. Policy 3.1 of the Climate Element recommends modification to building standards to reduce impacts of climate change. Such a change could increase the cost of construction;

		however, the cost of failure to keep pace with climate change could result in far greater cost in repairs, insurance premiums, or loss of insurance coverage. Requirements under the Wildlands Urban Interface legislation (RCW 19.27.560) will likely meet or exceed the implied requirements of this policy and will be mandated under state law.
91) Support for prioritizing water availability in development of new homes and parcels, including creation of a water steward position.	No policy recommendation.	5 Respondents. Goal 12 and policies 12.1 through 12.4 of the Draft Climate Element address these concerns. The implementation of a Water Steward position with the County was not included as a ballot measure by the Charter Review Commission.
92) Support for protecting and restoration of ecological resources that aid in climate resilience, including old-growth forests.	No policy recommendation.	3 Respondents. Draft Climate Element policies 4.1, 7.1 and 7.3 through 7.5 address the stated concerns.
93) Focus on natural disaster preparedness such as Cascadia earthquake.	No policy recommendation.	2 Respondents. The Clallam County Hazard Mitigation Plan was recently approved by FEMA and addresses the concerns expressed.
94) Support regulations that prevent development in high risk and environmentally sensitive areas.	No policy recommendations.	2 Respondents. The requirements of the Critical Areas Ordinance and Shoreline Master Program address several issue areas related to this concern. Additionally, Draft Climate policies 13.1 through 13.3 provide an additional framework for considering increased flood, wildfire, and other climate-related risks.
95) Supports County use of electric vehicles	Recommend new policy under Climate Element: <u>Policy 10.5: explore the feasibility of incorporating electrical vehicles within the County fleet of vehicles.</u>	2 Respondents. Clallam County is not responsible for controlling greenhouse gas emissions under the GMA. However, if use of electric vehicles are shown to meet the transportation needs of County government and at a reasonable (comparable) cost, incorporation would make the operations of the County less dependent on fossil fuels and would reduce emissions.
96) More affordable housing including high-density housing and housing that targets seniors, youths, students, and the disabled.	No policy recommendation.	58 Respondents. The new housing element, predicated on the land capacity analysis completed for the CPU, addresses the concerns expressed within the capabilities of the Department.

97) Supports shift from extraction-based economy to a tourism-based economy.	No policy recommendation.	5 Respondents. Consistent with the EDC's Five-Year Economic Plan, economic development policies being recommended under the CPU, among others, recommends and supports focus on four "prosperity clusters" for promoting economic development: maritime, manufacturing, timber products, and construction. Tourism, while good for the business owner, does not typically provide prosperity-wage jobs. Policies that would diminish prosperity wage jobs would be counter-productive with this focus and is not recommended.
98) Support for expanded multi (mixed)-use buildings.	No policy recommendation.	3 Respondents. Mixed-use buildings, including a range of commercial and urban-density residential, are already allowed under most urban-commercial zoning districts. Policy support is already established under CCC 31.02.281(4)(b) & (g).
99) Support for improved internet access.	No policy recommendation.	2 Respondents. See response to Comment 88, above.
100) Support for a moratorium on large housing developments.	No policy recommendation.	2 Respondents. In order to meet our housing objectives and improve the stark housing shortage that currently exists, new housing must be created.
101) Support for a more circular, local economy.	No policy recommendation.	1 Respondent. Policies promoting agricultural products development and economic policies focusing on prosperity-wage employment clusters will help to increase economic growth, promote local products, and generate economic relationships that strengthen the local economy. Further policies are not recommended.
102) Support for residential occupancy of RVs.	No policy recommendation.	1 Respondent. The RV Use Ordinance, currently in process, addresses the concerns related to this matter. No further policy is recommended.
103) Support for reducing permitting time and costs.	No policy recommendation.	1 Respondent. Clallam County updated its Fee Schedule Ordinance in 2024. Building and Planning fees were brought into a range comparable with the aggregate of six comparable county

		jurisdictions. As a percentage of over-all project costs, County permitting fees remain affordable and do not presently represent a significant deterrent to development.
104) Assist the subdivision of property with grants to pay for water and sewer.	No policy recommendation.	1 Respondent. The provision of sewer and water services are important to future growth and development, especially in presently unserved, unincorporated UGAs. However, such projects have to be approached from a regional perspective. Obtaining grants, if possible, for individual projects, would constitute use of public funds for personal gain, which is not allowed.
105) Create neighborhood centers that do not require access to SR 101.	No policy recommended.	1 Respondent. Historic development patterns typically coincide with the highway corridors of SR 101 and SR 112. Under the GMA, "neighborhood centers" fall under one of two categories: UGAs or Local Areas of More Intense Rural Development (LAMIRDS). The designation of both are dependent, in part, on the historic development patterns that existed with the passage of the GMA (1990). The Transportation Element does include policies intended to reduce reliance on direct highway access, but in large part, that is where our urban and rural centers are located as a historic reality.
106) Limit growth on the east side of the County to within City limits only.	No policy recommendation.	1 Respondent. There is no reasonable mechanism for achieving this desired outcome.
107) Improve bike access and network of bike rentals.	No policy recommendation.	1 Respondent. The Bicycle Plan establishes routes designated for bicycle corridors (CCC 31.02.442, and subregional plans). Several of these routes coincide with urban and rural centers that provide opportunity for bicycle rentals. The expansion of rental opportunities are more a function of economic demand than lack of policy.
108) Tax home vacancies.	No policy recommendation.	1 Respondent. See response to Comment 6, above.
109) Improve day care availability.	No policy recommendation.	1 Respondent. As noted above, family day care providers (12 or fewer children) are allowed outright in most residential zones. Child

		daycare centers (unlimited) are allowed with a CUP in rural zones and allowed outright in all urban zones. The development of new daycare facilities are more a function of economic demand than lack of policy.
--	--	--

The above suggested policies have been included as a means of addressing comments received within the framework and requirements mandated by the Growth Management Act and that are internally consistent with other requirements of the Comprehensive Plan. They are not intended as the only alternatives available.

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

Sincerely,

Bruce Emery, Director
Clallam County DCD