

AGENDA

Clallam County Planning Commission

Planning Commission Meeting of Wednesday, March 18, 2026, 6:00 p.m.

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

- A. CALL TO ORDER**
- B. PLEDGE OF ALLEGIANCE**
- C. ROLL CALL**
- D. WELCOME**
- E. APPROVAL OF MINUTES:** March 4, 2026
- F. ANNOUNCEMENTS:**
- G. PUBLIC COMMENT on AGENDA ITEMS** – Please Limit Comments to Three Minutes
Heather Cantua granted 10 minutes.
- H. UNFINISHED BUSINESS:** None
- I. PUBLIC HEARING/COMMISSION ACTION:** Continued Public Hearing of the Comprehensive Plan Update
- J. WORK SESSION ITEMS:** Continued work on the changes to the Comprehensive Plan Update
- K. PUBLIC COMMENT** – Please Limit Comments to Three Minutes
- L. DISCUSSION OF PUBLIC COMMENTS**
- M. GOOD OF THE ORDER**
- N. ADJOURNMENT**

Members:

Chair, Steve Gale & Vice-Chair, Katina Hester
Warren Billups; Thomas Butler;

Jane Hielman; Ron Long; Kenneth Reandeau; Janice Wilson; Vacancy

Department of Community Development Staff:

Tim Havel, Deputy Director; Bruce Emery, DCD Director

CLALLAM COUNTY PLANNING COMMISSION

MEETING MINUTES

Wednesday, March 4, 2026 | 6:00 p.m.

Room 160, Clallam County Courthouse, 223 East Fourth Street, Port Angeles, WA 98362

Zoom Meeting No. 857 7304 5582 | Passcode: 12345

A. CALL TO ORDER / ROLL CALL

Vice-Chair Katina Hester called the meeting to order and presided in the absence of Chair Steve Gale.

Members Present:

Vice-Chair Katina Hester (presiding)
Commissioner Warren Billups
Commissioner Thomas Butler
Commissioner Jane Hielman
Commissioner Ron Long
Commissioner Kenneth Reandeau
Commissioner Janice Wilson

Members Excused:

Chair Steve Gale (excused absence)

Staff Present:

Bruce Emery, Department of Community Development (DCD) Director
Tim Havel, Chief Deputy Director

B. PLEDGE OF ALLEGIANCE

The Pledge of Allegiance was recited.

C. WELCOME

Vice-Chair Hester provided the welcome.

D. APPROVAL OF MINUTES — February 18, 2026

Commissioner Long moved to approve the minutes of February 18, 2026. Commissioner Wilson seconded the motion. The minutes were approved.

E. ANNOUNCEMENTS

There were no announcements.

F. PUBLIC COMMENT ON AGENDA ITEMS

Heather Cantua addressed the Commission, raising concerns about serious deficiencies in the public process related to the Comprehensive Plan Update (CPU). Her comments included the following:

Lack of early and continuous public engagement, as required under the Growth Management Act (GMA).

No email distribution list to notify the public of meetings or updates.

Insufficient opportunity for public input.

The deficiencies in the process warrant a more in-depth conversation.

Renee Paradis addressed the Commission as the second public commenter. Her comments included:

She seconded the comments of the previous commenter.

This meeting represents her first notice of the process.

Lack of preparation time to provide meaningful comment due to inadequate notice.

There was no Unfinished Business.

G. PUBLIC HEARING / COMMISSION ACTION: Continued Public Hearing — Comprehensive Plan Update

DCD Director Bruce Emery shared written testimony submitted by Heather Cantua and provided clarification regarding the notice deficiencies she had identified. He noted that the County website was not auto-generating update emails as expected; however, the website has since been updated and is now being consistently updated with new information and documents. He noted that legal notices have been published as required. Director Emery recommended keeping the public hearing open for the next two meetings. He also noted that Ms. Cantua had requested that she be added to the agenda to present to the Planning Commission.

Public Testimony — Heather Cantua: Ms. Cantua testified regarding the difficulty of distinguishing the CPU from the Grouse Glen Conditional Use Permit (CUP). She noted that her written testimony includes a facts section and a legal section. She stated that the Planning Commission's decision will be rendered based on Comprehensive Plan elements that have not been updated in 30 years. Her concerns for the Planning Commission begin on page 43 of her written comments. She stated that the GMA requires early and continuous engagement, and that extending the public hearing still fails to address the early and continuous engagement requirement. She referenced the 2019 process regarding the mineral resource lands consent order.

Renee Paradis: Expressed unfamiliarity with the details presented and echoed Ms. Cantua's comments.

Jake Seegers: Echoed Ms. Cantua's comments and recommended adding her request to the agenda. He noted that when there are separate elements with no local involvement, there is a disconnect. He added comments regarding the lack of timely notice for the RV Ordinance update, which has been referred back to the Planning Commission by the Board of County Commissioners (BOCC).

Arian Goodson — Western Region Committee / West End: Noted that the Western Regional Planning Committee (WRPC) has not met in 30 years. Director Emery came to the West End, and multiple people signed up to receive periodic notices of the updates that did not occur. He stated that placing a resort in the middle of a neighborhood is a violation of plans. He noted that in 2019, a Clallam County moratorium was imposed by the Growth Management Hearings Board (GMHB) in connection with the 2018 Comprehensive Plan update, and it was stopped until it could be proven that the public had participated.

Commissioner Butler: Stated that the Commission should hear more from the West End.

Commissioner Long moved to continue the public hearing to the next meeting. Commissioner Billups seconded the motion. Motion carried.

Commissioner Hester: Noted that Commission bylaws allow for a person to represent a group for 10 minutes. She invited Ms. Cantua to present at the next meeting for 10 minutes, with public comments to be limited to the CPU and not the CUP.

H. WORK SESSION: Comprehensive Plan Update

Director Emery addressed Table 3 of the Comprehensive Plan Update. He noted that Ms. Cantua's comments were not incorporated into the Table 3 document under review.

Table 3 Review:

Vice-Chair Hester presented a consent approach to Table 3.

Commissioner Butler raised a question regarding the definition on page 8.

Vice-Chair Hester noted that the word "science" was misspelled.

Commissioner Butler asked whether the definition of "Potable Water" could be changed. Director Emery noted this had previously been rejected on 2/4.

All other previously voted items were uncontested. Table 3 review was completed.

Vice-Chair Hester suggested creating Table 3.1 for any new comments based on new testimony.

Table 4 Review — Commerce Section:

Director Emery noted that 5 of the 6 remaining items in Table 4 are transportation-related and not required by applicable RCW/WAC provisions.

Vice-Chair Hester recommended tabling item #1 due to the planned revisit of the Agricultural Accessory Use ordinance.

Commissioner Long noted that quite a bit had been heard about public outreach, to which Director Emery responded that the West End issue is not invalid — only the GMHB can invalidate it. He clarified that the West Regional Planning Committee was disbanded, and that the Planning Commission has the final word on recommendations. The absence of the WRPC does not invalidate this process.

Table 4:

Commissioner Butler: "Conventional Pollutants" language under Item 2 is vague and limiting. Staff agreed to remove the term "Conventional."

Commissioner Long: Language of the last sentence Item 5 — "Assistance programs should..." — was noted as clunky. Staff agreed to provide an edited version.

High risk areas for displacement item 6 were discussed.

Item 10 was recommended as not applicable since no UGA boundaries were being expanded or modified under the CPU. Items 11, 14, 15 and 26 were identified as exempt from any update requirements pursuant to RCW 36.70A.095(2) and WAC 365-196-443, Table 1.

Vice-Chair Hester concerning Item 4: Although the transportation element is not required, should language regarding bicycle routes be included?

Commissioner Butler: Questioned what the demographic profile of the population growth will be and whether/how that should influence the plans.

Commissioner Butler, Item #22: Why are religious organizations specifically identified?

Commissioner Billups, Item #18: What is the difference between the CWPP (County Wide Planning Policies) and the Comprehensive Plan?

Vice-Chair Hester, Item #25: Concern about the last sentence — could "specific strategies" create loopholes?

Vice-Chair Hester, Item #26: Supplemental — Exempt.

Consideration of proposed policy changes in February 24, 2026 Memorandum:

Director Emery presented the draft policy changes to the Western Regional Plan (Ch 31.06) included in the February 24, 2026 Memorandum to the Planning Commission.

Commissioner Billups recommended that the threshold for triggering water resource review under 31.06.080(2) be the requirement for a water right. Vice Chair Hester expressed concern that the language under 31.06.010(3) was too broad and requested staff to prepare more specific thresholds for considering new large-scale projects. It was also suggested that more specific strategies be considered for incentivizing use of local materials and labor under 31.06.100(13).

Work session concluded.

I. PUBLIC COMMENT

Renee Paradis: Expressed difficulty finding parts of the GMA Update on the County's website. Recommended that the proposed draft be presented in a comprehensive format rather than piecemeal. Stated that a comprehensive format is preferable and agreed that, regarding pollutants, lists are a bad idea. Noted that "Conventional" definition should come from a dictionary. Observed that the shifting older demographics in the area are likely due to a lack of jobs or affordable housing and encouraged focusing on that rather than RVs, codes, or other issues. Added comments regarding the use of reclaimed water for major developments.

Heather Cantua: Appreciated the invitation to present at the next meeting. Agreed that the WRPC is not currently invalid but stated that lack of public comment is grounds for invalidation. Noted that maps used to be printed and published at libraries. She appreciated the suggestions from oral comments and directed the Commission to Subsection 3 of her written testimony, with particular emphasis on wildfires, employment plans, and the lack of updates to the Western Regional Plan. She noted she plans to hold a public meeting and invited the County to attend.

Arian Goodson: Appreciated all who volunteer their time and understand the complexity of the changes. Appreciated Director Emery's understanding of West End water issues. Stated that entrenched citizens should be protected first. Noted that Grouse Glen has brought many people to this forum, and that to say nothing has changed in 30 years is inaccurate. Expressed concern that outside influences are consuming tourist resources.

J. DISCUSSION OF PUBLIC COMMENTS

Commissioner Wilson requested that staff determine whether it is possible to obtain a history of the Western Regional Planning Committee. She noted that concerns about communication methods had been raised repeatedly and suggested surveying the public to determine the best communication methods and what constitutes adequate notice in the community.

Commissioner Long: Stated that the Commission has met and exceeded the threshold required by the state. Acknowledged there may be more that could be done, but confirmed the Commission has done more than required.

K. GOOD OF THE ORDER

Director Emery: When representing the public, ensure it is clear that you are not representing the Planning Commission or any individual, without intention.

L. ADJOURNMENT

The meeting was adjourned at 8:06 p.m.

DRAFT — NOT APPROVED



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Memorandum

Date: March 11, 2026
To: Clallam County Planning Commission
From: Bruce Emery, Director of Community Development
Re: Planning Commission CPU Continued Public Hearing, 03/18/2026

Hello, Planning Commission Members. The public hearing for the CPU will continue on March 18, 2026.

Packet Items. Your packet includes the following:

- Testimony Response Table 3.1
- Draft Changes to Comprehensive Plan discussed during March 4th meeting

The Table 3.1 is a truncated version of Table 3, providing staff response specifically to written testimony item 31, which was received from Heather Cantua on February 25, 2026. The Draft Changes to Comprehensive Plan includes those edits to the Western Regional Plan as we discussed during the March 4th meeting. I also included the remaining items included in the February 24th memo but not yet discussed by the Commission. Included is draft language concerning agricultural accessory uses.

Follow-up Items

During the March 4th meeting, Commission members expressed interest in the history of the Western Clallam County Planning Commission (WPC). The Commission was created on August 10, 1993, under Ordinance 514, 1993. It amended the County Code to create new sections 26.01.062 and .064, which created the WPC. Under the Ordinance, the purpose of the WPC was to:

“...work jointly and cooperatively with the City of Forks and surrounding area in regional planning and to formulate and recommend to the legislative bodies of the City of Forks and Clallam County the comprehensive plan elements required by the Growth Management Act.”

The Ordinance conferred the planning recommendation responsibilities reserved for the Planning Commission for the specified area of the Western Clallam County region (CCC 26.01.064).

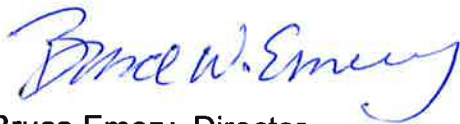
Although amending the County Code, the Ordinance clearly articulated the terms for the newly formed WPC, limiting those terms to the earlier of the adoption of the City and County Comprehensive Plans under the GMA, or within three years from the effective date of the Ordinance. This made clear the WPC was intended to be a temporary commission for the purpose of formulating a recommendation on the GMA-required changes to the County's Comprehensive Plan. The Western Regional Comprehensive Plan was adopted by the BOCC on November 7, 1995 (Ord. 583), representing the discontinuance of the WPC from that day forward.

On another matter, I investigated the allocation quantity represented in a water right certificate issued in the WRIA 18 Water Exchange program. Each allocation certificate requires a mitigation fee of **\$5,250**. The following represents what is available to a landowner based on desired indoor or outdoor water uses:

- Indoor domestic use: 150 GPD
- Outdoor domestic use (landscaping/limited ag): 210 GPD
- Livestock use (up to 15 animals): 180 GPD

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

Sincerely,



Bruce Emery, Director
Clallam County DCD

Clallam County Comprehensive Plan Update

Summary of Public Testimony and Corresponding Recommendations

as of March 11, 2026, Table Version 3.1

The following provides a summary and recommended response to testimony received during the public hearing process. To avoid duplication and per the planning Commission's instruction, this table is being provided as a supplement to CPU Policy Response Table 3.

Summary of Testimony	Recommended Policy/Response
31) Emailed testimony from Heather Cantua, dated February 25, 2026. Written correspondence included an extensive report concerning the Luminary Resort facility project (PCUP2025-00011) and five attachments, including three series of email correspondences with County and City if Forks staff, unofficial transcription of proceedings before the Planning Commission (2/18/2026), and the original Western Regional Comprehensive Plan (WRCP) (Ord. 583, 1995). The Comments also included the current iteration of draft changes to Ch. 31.02, WRCP, but are not included as this is a draft document subject to change during the public review process. Issues raised (Part III) concerning the WRCP include: a) There is no historical information in the WRCP. Comments recommend incorporating information from <i>Olympic Peninsula Loop Heritage Corridor Tour</i> recording on Youtube. b) There is no historical population and growth projections within the WRCP.	The following responds to the issues identified in Part III of the written testimony, concerning the Western Regional Comprehensive Plan (WRCP): (a) Each of the County's four sub-regional plans were developed under their own separate process, involving BOCC-appointed community advisory groups, including the Western Clallam County Regional Planning Commission (RPC). As a result, each regional plan is notably different than the others—reflecting the individual choices made by the advisory committees under their respective grass-roots planning efforts. Pursuant to RCW 36.70A.080(2), regional plans are not required, but if adopted, are only required to demonstrate consistency with the county-wide comprehensive plan. There is no requirement that a comprehensive plan include historical information, although as a planning principle, it is usually a good idea for context. If specific information is requested, it could be considered for inclusion. If the Planning Commission wished to take a wholesale look at including historical information, I would recommend docketing this item so that sufficient time can be devoted to its development and recommendation. b) Historical data for the CPU is contained in the updated Clallam County Profile, 2024 (Appendix F) and projected regional growth data is contained within the Clallam County Land Capacity Analysis, 2025 (Appendix B). The latter included an analysis on the adequacy of existing zoning and vacant land capacity to meet projected growth over the 20-year planning horizon. c) Under the proposed Climate Element of the County-wide Comprehensive Plan, emergency preparedness is being considered on a regional approach (31.02.810(5)). This includes last year's adoption of the Multi-Jurisdictional

c) There is no documentation of historic wildfires in the Planning Area within the WRCP. d) Concerns were expressed concerning infrastructure vulnerabilities, especially the risk of power outages given the area's remoteness. e) Concerns were expressed about the length of travel required due to the area's remoteness and the Highway's (main travel corridor) limited improved width. f) Concerns were expressed that there are no paved parking lots or electrical fueling stations throughout the region, presumably desiring that it remain that way as part of the region's character (e.g. not large, paved parking surfaces). g) Concerns were expressed that new development should be conditioned to avoid impacts to the natural night sky. h) Concerns were expressed regarding the capacity of existing emergency responders to handle increased response load due to new recreational and resort development.	Hazard Mitigation Plan (HMP, Appendix M). The HMP is based, in part, on the County's Climate Vulnerability Assessment (Appendix K), which includes fire and flood risks prevalent in the western region. Additional policies are being proposed under CCC 31.02.820(8). d) Power and other infrastructure is vulnerable to the risk of wildfire, landslides, flooding and other risks associated with climate change. In addition to the new policies under 31.02.820, utility policy 31.02.720(6) specifically speaks to integrating resiliency to power transmission. e) The western region is largely a remote area consisting primarily of small areas of rural development within large areas of commercial forest resource lands. The transportation corridor is adequately-sized to meet the demand of the area. f) There are currently no standards requiring parking areas to be paved or not be paved, or to require electric fueling stations. Although the majority of parking areas in the western region are unpaved, it may not be advisable to require no pavement or not, or electric fueling stations as standards for development. Depending on the scale and type of use, a paved parking area may be necessary to avoid track-out, control stormwater, or for aesthetic reasons. Similarly, as electric vehicles increase, prohibitions on electric fueling stations would not be advisable and would conflict other policies of the Comprehensive Plan. g) Impacts to nighttime sky viewing have been addressed under 31.02. 340(1)(b). (h) all conditional use applications are forwarded to the regional fire districts for review and comment. Conditions are often required for new development to address potential issues. Large-scale risks (e.g. wildfire) is addressed in the Multi-jurisdictional Hazard Mitigation Plan and in the Clallam County Community Wildfire Protection Plan.
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Draft Changes to Western Clallam County Regional Comprehensive Plan, Ch. 31.06

The following includes revisions to the responsive changes to Chapter 31.06 following the Planning Commission's deliberations on March 4, 2026. Several of these excerpts were included in the February 24, 2026, Memo to the Planning Commission. Changes from the prior memo are highlighted in yellow.

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

- Testimony suggested that Water resources and sewage disposal in rural areas were lacking. 31.06.070(5) and (6) address water and sewer systems, including onsite septic systems in the region. Water resource issues could benefit from new policy under 31.06.080(2) (see below).
- Testimony suggested that water availability should be demonstrated for all CUPs, subdivisions, and major development proposals including hydric continuity and impacts to vicinity wells and aquatic habitats. Suggest the following under 31.06.080(2). PC discussion suggested the threshold for requiring a water right should be incorporated.

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

- Testimony suggested that project approvals need to fit within the local ecosystem, resource limitations, and reflect the unique natural resources of the community. Originally, staff recommended edits to 31.06.010(3) to include a broadly-worded requirement for reviewing "major new development" for compatibility with the local setting. Given the desire of the Planning Commission to provide more specific details on what should be reviewed, staff recommends this policy be relocated under a new section 31.06.100(5), to read as follows:

(5) The rural character and natural resources of the Planning Region should be protected. For new development requiring a conditional use permit, This should include evaluation to ensure its characteristics and scope are compatible with the rural community character, resources, and natural setting of the project vicinity, including but not limited to:

- a. The size and design of new buildings and other improvements,
- b. Anticipated traffic and whether improvements to the transportation network should be required,
- c. Hours of operation, noise, odors, or other nuisance characteristics that could significantly impact area residents,

- d. An analysis of water availability that ensures existing wells, water systems or river and stream environments will not be adversely impacted,
- e. Location of known wildlife corridors, scenic vistas or other natural features that could potentially be impacted by the development.

- Testimony requested policies that require use of local materials, labor, and other requirements that address local community needs. New policy 31.06.100(13) could be considered including broader strategies for incentivizing use of local resources as discussed during the 3/4/26 meeting, as follows:

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

- Testimony requested removal of reference to "Bear Creek Resort" and "golf courses." These specific references are found under CCC 31.06.070(7). The following changes were generally consented to by the PC during the 3/4/26 discussion:

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

- Pursuant to Table 3, Testimony #3, the Western Clallam County Regional Planning Commission (RPC) vision statement was retained under 31.06.010. However, in reviewing the text, it implies that the RPC still exists as an entity, which it does not presently. To address this, staff recommends the following edits to 31.06.010:

The Western Clallam County Regional Planning Commission (RPC) ~~is~~was a planning commission formulated by joint agreement of Clallam County and the City of Forks. Its mandate ~~is~~was to create a comprehensive land use plan for an area in Western Clallam County that is defined by the borders of the Quillayute Valley School District, ~~as detailed in the attached map.~~ This

comprehensive plan ~~was~~will be submitted directly to the Clallam County Commissioners and the Forks City Council. The RPC serveds as the first cooperative planning venture between Clallam County and the City of Forks.

Other changes discussed on 3/4/3036 by the Planning Commission

- Per PC discussion regarding rainwater catchment, staff recommends the following edit to 31.02.820(12)(b):

(b) Policy 12.2: Seek funding from the Department of Ecology to develop and implement a comprehensive drought resilience strategy that incorporates climate projections and sets action levels for different drought stages. Encourage residents to reduce water consumption through smart grid water use, repairing infrastructure, rainwater catchment where allowed, water reclamation systems, smart irrigation technologies, and updated water rates to discourage lawn watering. Promote lawn alternatives through xeriscaping and other low-water use, low maintenance designs. The Clallam Conservation District can provide resources to landowners to help facilitate lawn conversions and create co-benefits of reducing water use and promoting native species that support local wildlife and pollinators. Promote incentives for sustainable food cultivation.

Continued discussion on agricultural accessory uses

The following was included in the February 24, 2026, Memo to the Planning Commission and was instructed by the Vice Chair to be considered at the March 18, 2026, Planning Commission meeting:

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

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

- Consider additional accessory uses, including Harvest-Host and Wineries, Cideries, Breweries and distilleries. Concerning Harvest-Host, the reservation of one RV use site on a farm would not conflict with the existing or proposed RV

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

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

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

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

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

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

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