

AGENDA

Clallam County Planning Commission

Planning Commission Meeting of Wednesday, May 20, 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:** May 6, 2026
- F. ANNOUNCEMENTS**
- G. PUBLIC COMMENT ON AGENDA ITEMS** – Please limit comments to three minutes
- H. UNFINISHED BUSINESS**
- I. PUBLIC HEARING/COMMISSION ACTION**
- J. WORK SESSION ITEMS:** Continued work on 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 and Vice-Chair Katina Hester;
Warren Billups; Thomas Butler; Jane Hielman;
Ron Long, Kenneth Reandeau; Janice Wilson; Dist. 1 Vacancy

Department of Community Development Staff:

Donella Clark, Principal Planner; Bruce Emery, Director

MINUTES

Clallam County Planning Commission

Meeting of May 6, 2026, 6:00 PM

- A. CALL TO ORDER: The meeting was called to order at 6:00 p.m.
- B. PLEDGE OF ALLEGIANCE.
- C. ROLL CALL: Members present were Chair Steve Gale, Vice Chair Katina Hester, Ken Reandeau, Tom Butler, Warren Billups, and Janice Wilson. Bruce Emery, Director and Donella Clark, Principal Planner, represented staff from the Department of Community Development.
- D. WELCOME: Chair Gale welcomed all in attendance.
- E. APPROVAL OF MINUTES: Commissioner Hester motioned to approve the minutes and Commissioner Wilson seconded. Motion passed with one abstention.
- F. ANNOUNCEMENTS: DCD is interviewing for a Planner I which we hope to have filled by July.
- G. PUBLIC COMMENT PERIOD: Letter was received from Virginia Shogren which was distributed. Virginia Shogren responded in person to Director Emery's memo regarding the irrigation piping. John Worthington spoke regarding the DRMT not being happy about water allocation and how the Dungeness project departed from Jimmycomlately science.
- H. UNFINISHED BUSINESS: None.
- I. PUBLIC HEARING ITEM: None.
- J. WORK SESSION ITEMS: Director Emery went over the memos and the zoning changes. Addition of small-scale resort policy with density limitations. Commissioner Wilson liked the direction. Standards will still need to be written and the use table completed. Ag accessory was discussed and a debate if 15% should be less. Commissioner Billups did not want to see a two acre cap and would like it to align with the RCW's. Master Planned resorts did not have a clear definition in other jurisdictions, but are rather defined by standards. Director Emery attempted a definition. Commissioners went through the Commerce comments and discussed the deficits of the Housing Element, the information provided, clarification of setbacks, and the explanations. Public Works is still working on the transportation portion, identifying projected cost and revenues. Next meeting want to discuss changes to the zoning as it may change the character.
- K. PUBLIC COMMENT PERIOD: Kim Williams from the Clallam Conservation District. commented that a moratorium on piping would be out of the authority of the County. Water conveyed is controlled by the water purveyors and land owners do not have rights to the seepage. Virginia Shogren noted that Kim Williams is the manager of the Clallam Conservation District. John Worthington noted that the miles took out of the Dungeness has not helped, the chinook are still on the endangered list.
- L. DISCUSSION OF PUBLIC COMMENTS: Commissioner Butler noted that the irrigation topic is very interesting but appears to be out of the purview of the Planning Commission and is a matter between Department of Ecology and the land owners. Director Emery commented that water adjudication is under the authority of Department of Ecology. Commissioner Billups restated comments from the last meeting that the County was not involved in permitting.
- M. GOOD OF THE ORDER: None.
- N. ADJOURNMENT: The meeting adjourned at __8:12 p.m.___

Virginia Shogren
961 W. Oak Court
Sequim, WA 98382
360-461-5551

May 6, 2026

Meeting of the Clallam County Planning Commission
223 East Fourth Street, Room 160
Port Angeles, WA 98362

Public Comment Re: Comprehensive Plan Periodic Update – Irrigation Pipeline
Moratorium and Ditch Protection

Dear Planning Commission Members,

I reviewed Director Emery's ("Director") April 29, 2026 memorandum to this Commission in which he states that the Department of Community Development "is adamantly opposed to any policy supporting or any action proposed to implement a moratorium on further ditch tightlining." Memo., p. 3.

The memorandum exposes several key inconsistencies. The Director's 'adamant' position should give this Commission serious reason to pause.

Response to "Permit Authority"

The Director states that the pipeline projects will need approval from the Washington Department of Fish and Wildlife. This is news to me. When I informed the Department of Fish and Wildlife about the so-called 'emergency' pipeline project along the original ditch line, they immediately wrote back to say that the matter was "outside of the[ir] regulatory authority" and that I should remove them from all correspondence. (copy enclosed)

Likewise, the Chair of the Conservation District stated at a public meeting that they are done with pipeline projects. The Conservation District's involvement with the so-called 'emergency' project was limited to engineering services.

The City of Sequim pointed the finger at the County for the environmental review. They did not say that environmental review was not necessary. The City stated that it was not the lead agency in charge of that aspect of the project.

recent requirement for a FONSI determination “had nothing to do with the adequacy of the [2003] FEIS.” Memo., p. 2.

Graysmarsh legally challenged the adequacy of the 2003 FEIS and obtained a favorable settlement in order to protect its aquifer recharge from the adverse impact of pipelines. Clearly, reasonable minds differ as to the adequacy of the 2003 FEIS.

The question now is whether a 2003 FEIS is still viable in 2026 given the changed conditions that the Director himself is addressing in this Comp Plan update.

Under Washington’s State Environmental Policy Act (“SEPA”, RCW 43.21C¹ and WAC 197-11), the rules to update or supplement a FEIS focus on whether there are *substantial changes or new information indicating probable significant adverse environmental impacts not adequately covered in the original document*. WAC 197-11-600 (copy enclosed); see also, WAC 197-11-620 (Supplemental EIS — Procedures).

SEPA documents do not have a fixed expiration date, but agencies must ensure the analysis *remains adequate for the pending decision*. See, ecology.wa.gov (Revising and adopting existing documents).

As demonstrated by the Bureau of Reclamation’s requirement for a FONSI determination, a 23-year-old FEIS for a project involving water resources (piping in ditches) faced *significant scrutiny* likely due to changed baseline conditions. Agencies are expected to ensure that the analysis reflects current circumstances, especially for dynamic elements like hydrology, climate, and water demand.

The County has updated data on: (1) climate change effects (*e.g.*, altered precipitation, drought frequency, streamflows); (2) drier baseline conditions (established, in part, by the City of Sequim’s 2008 study showing the severe drop

¹ The purposes of SEPA are: (1) To declare a state policy which will encourage productive and enjoyable harmony between humankind and the environment; (2) to promote efforts which will prevent or eliminate damage to the environment and biosphere; (3) and [to] stimulate the health and welfare of human beings; and (4) to enrich the understanding of the ecological systems and natural resources important to the state and nation. RCW 43.21C.010 (emphasis added).

[T]he [pipeline] project to be undertaken by the SPTIA is considered a Watershed Restoration Project in accordance with RCW 36.70A.460, and is subject to the limited permitting requirements articulated in RCW 89.08.450 to .510. **To date, Clallam County has not received the consolidated permit application nor any formal opportunity to comment on the proposal.** Any future review and official response will be based on the information provided by the proponent. **Consideration of permit conditions in advance of that information would be premature.**

December 18, 2023 Email from Bruce Emery to Judy Larson and Mike Gallagher (DOE), copied to Todd Coward and Dee Boughton, Esq. (emphasis added).

In 2023, according to Director Emery, the project would require review by the County of a consolidated permit application.

Three years later, the County is now ‘preempted’ from taking any action whatsoever.

The public is constantly asking if they are next on the pipeline crusade. I don’t know what to tell them. The more I try to become informed as a concerned citizen, the more confused I become. The projects seem cloaked in secrecy, with all participants highly protected by government officials.

When I spoke with an irrigation entity worker who was almost killed by an exploding pipeline connection, I asked her if the projects were intended to help the salmon. She laughed, and said, no, the projects are for jobs.

Having moved to Sequim in 2002, I understand that funding is tight everywhere, and that the local excavation industry and plumbing industry benefit from pipeline development and maintenance.

But that does not give our elected officials the right to ignore our water rights, and to actively turn a blind eye to severe environmental impacts.

We have all heard of the coming water wars. This is your opportunity to put a time out on a very bad situation. The Director’s inconsistent positions tell us that there is a lot more going on than meets the eye.



Virginia Shogren <vshogren@gmail.com>

Notice of Unauthorized Pipeline Construction Activity

Zitomer, Danielle R (DFW) <Danielle.Zitomer@dfw.wa.gov>

Fri, Oct 17, 2025 at 4:55 PM

To: Virginia Shogren <vshogren@gmail.com>, Kim Williams <kim.williams@clallamcd.org>, "Info@clallamcd.org"

<info@clallamcd.org>, CSD - Seth Woolson <swoolson@csdlaw.com>

Cc: "ihoiby@usbr.gov" <ihoiby@usbr.gov>, "skimbrel@usbr.gov" <skimbrel@usbr.gov>, "Fike, Jean (SCC)"

<JFike@scc.wa.gov>, "Culp, Jon (SCC)" <JCulp@scc.wa.gov>, "bruce.emery@clallamcountywa.gov"

<bruce.emery@clallamcountywa.gov>, DOR Clallam County BOE <Loni.Gores@clallamcountywa.gov>,"

"mark.ozias@clallamcountywa.gov" <mark.ozias@clallamcountywa.gov>, "mike.french@clallamcountywa.gov"

<mike.french@clallamcountywa.gov>, "randy.johnson@clallamcountywa.gov" <randy.johnson@clallamcountywa.gov>,"

"Boughton, Dee" <dee.boughton@clallamcountywa.gov>, "knelson-gross@sequimwa.gov" <knelson-gross@sequimwa.gov>,"

Paul Bucich <pbucich@sequimwa.gov>, julie Vig <secretary.spt@gmail.com>, "Ament, Shelly M (DFW)"

<Shelly.Ament@dfw.wa.gov>, "dmha@olypen.com" <dmha@olypen.com>, Hansi Hals <hhals@jamestowntribe.org>, Shawn

Hines <shines@jamestowntribe.org>, "ascalotti@jamestowntribe.org" <ascalotti@jamestowntribe.org>, Neil Harrington

<nharrington@jamestowntribe.org>

Good afternoon,

Thank you for your email. Based on the content of the letter you attached, this matter appears to be outside of the regulatory authority of the Washington Department of Fish and Wildlife.

The piping work, as described, is not occurring in a regulatory watercourse of the state, as defined in WAC 220-660-030. Bald Eagle management is the jurisdiction of the US Fish and Wildlife Service via the Bald and Golden Eagle Protection act, and is outside of the scope of Washington Department of Fish and Wildlife.

Going forward, please remove Shelly Ament and me from these correspondences and email chain. While I think it is most appropriate for us to be removed from *this* discussion and email chain, please do not hesitate to reach out to me directly if you have future questions regarding the Hydraulic Code of Washington, regulatory watercourses, or WDFW listed Priority Habitats and Species.

Best regards,

Danielle Zitomer

(she/her)

Area Habitat Biologist

Region 6, Port Angeles Office

Washington Department of Fish and Wildlife

Danielle.Zitomer@dfw.wa.gov

360-764-0866

(i) Substantial changes so that the proposal is likely to have significant adverse environmental impacts;

or

(ii) New information indicating a proposal's probable significant adverse environmental impacts.

(e) If a proposal is substantially similar to one covered in an existing EIS, that EIS may be adopted; additional information may be provided in an addendum or SEIS (see (c) and (d) of this subsection).

[Statutory Authority: 1995 c 347 (ESHB 1724) and RCW 43.21C.110. WSR 97-21-030 (Order 95-16), § 197-11-600, filed 10/10/97, effective 11/10/97. Statutory Authority: RCW 43.21C.110. WSR 84-05-020 (Order DE 83-39), § 197-11-600, filed 2/10/84, effective 4/4/84.]



CLALLAM COUNTY
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Memorandum

Date: May 12, 2026
To: Clallam County Planning Commission
From: Bruce Emery, Director of Community Development
Re: Planning Commission work session on the CPU, 05/20/2026

Hello, Planning Commissioners. The following details packet materials for the May 20th Work Session.

Packet items. Your packet includes the following:

- Revised Addendum 3, Appendix C, Racially Disparate Impacts
- Proposed edits to the Comprehensive Plan and Zoning Code to address issues raised by Commerce.
- Excerpt Table 3.4, addressing Letters of Testimony, #57 through #81 (for actual letters, please refer to your 05/06/26 packet).
- Draft Findings Resolution.

New policy edits from 5/06/26 discussion. In follow-up to the discussion on 5/06/26, the following is proposed:

Agricultural and Non-Agricultural Accessory Uses. The Growth Management Act does not specifically define *agricultural accessory uses* or *nonagricultural accessory uses*. However, the intent of both terms are made clear pursuant to RCW 36.70A.077(3)(b), which reads in part:

(b) Accessory uses may include:

- (i) **Agricultural accessory uses** and activities, including but not limited to the storage, distribution, and marketing of regional agricultural products from one or more producers, agriculturally related experiences, or the production, marketing, and distribution of value-added agricultural products, including support services that facilitate these activities; and
- (ii) **Nonagricultural accessory uses** and activities as long as they are consistent with the size, scale, and intensity of the existing agricultural use of the property and the existing buildings on the site. Nonagricultural accessory uses and activities, including new buildings, parking, or supportive uses, shall not be

located outside the general area already developed for buildings and residential uses and shall not otherwise convert more than one acre of agricultural land to nonagricultural uses; and

The prior meeting's discussion included debate on what the maximum allowed area should be for nonagricultural accessory uses. As it turns out, the draft language I originally proposed appears to conflict with the maximum established under the RCW, which limits them to "...the general area already developed for buildings and residential uses and shall not otherwise convert more than one acre of agricultural land to nonagricultural uses." Key to this passage is "...not otherwise convert more than one acre..." In total, nonagricultural accessory uses could include unused portions of the "developed area" of the farm and extend no more than one acre into the farmed portion of the property.

With the above statutory language and discussion, we recommend amending CCC 31.02.115(3)(c) as follows:

(c) *Agricultural Accessory Uses.* Clallam County supports the inclusion of agricultural accessory uses that assist local farms into maintaining profitability and sustainability. Uses that assist with storage, distribution and marketing of locally produced agricultural products from one or more producers, agriculturally related experiences, or the production, marketing and distribution of value-added agricultural products, including support services that facilitate these activities, will be allowed within agricultural operations. Non-agricultural accessory uses and activities that are ~~related to and~~ consistent with the size, scale and intensity of the existing agricultural use of the property and the existing buildings on the site, ~~that also support the economic viability of the agricultural operation,~~ including new buildings, parking, and supportive uses, ~~will be allowed within the intensively shall not be located outside the general area already developed for buildings and residential uses~~ portion of the agricultural property and shall not otherwise convert more than one acre of agricultural land, or 15% of the net property acreage, whichever is less, to nonagricultural uses, ~~and Non-agricultural accessory uses~~ shall be focused on the least agriculturally productive portion of the property.

Revised definition for "Fully-Integrated and self-contained." During discussion, planning Commissioners requested revisions to ensure multiple features within the definition are present before a project is determined to be an MPR. Also, it was requested that both onsite and contracted municipal power and other services be articulated as acceptable. The following draft definition under 31.02.050(21) has been edited in response:

"Fully-integrated and self-contained," as used in the context of a Master Planned Resort (MPR) as also defined herein, refers to the completeness of development in which all aspects of a large-scale resort community has been considered and provided in order to address nearly all needs of its clientele, generally including a majority of the following but not limited to: cabins, condominiums, lodges, motels,

rental homes, and other short-term occupancy accommodations; accommodations adequate to house caretakers, groundskeepers, service personnel and others needed for the logistic operations of the resort community; indoor and outdoor recreation facilities such as golf courses, clubhouses, pro shops, spa facilities and undeveloped recreational areas; commercial facilities such as restaurants, barber shops, beauty salons, specialty shops, real estate and other professional offices, grocery stores, pet boarding and care facilities, and other services; open space areas such as lakes, wetlands, green belts, buffers, and wildlife preserves; facilities necessary for public safety such as fire and security stations, waste disposal, utilities (within the MPR), emergency medical facilities, and storage structures; transportation facilities; cultural community and entertainment facilities such as theaters, amphitheaters, galleries, arts and crafts centers, and interpretive centers. Power generation and certain community services may be provided onsite or contracted through other municipal service providers with demonstrated service capacity."

Satellite bedroom. Concern was expressed by Planning Commissioners regarding the new standards proposed under 33.50.060. Specifically, Subsection 6 included vague language concerning what constitutes *kitchen facilities*. After discussing this matter with Building Division personnel, the following responsive edits are being proposed to address these concerns:

6) To ensure the satellite bedroom remains separate and distinct from an accessory dwelling unit, the satellite bedroom shall not contain a kitchen or related kitchen facilities, including any improvements arranged for or conducive to the preparation or cooking of food, as demonstrated by inclusion of ~~of~~ three or more of the following items: propane gas outlet, 220 AC electrical outlet, double sink, bar ~~sink~~ exceeding one square foot, hot water line to any bar ~~or~~ sink, refrigerator exceeding 5 cubic feet or a place designed for accommodating a refrigerator exceeding 5 cubic feet, garbage disposal, dishwasher or spaced ~~d~~ designed for a dishwasher, any device designed for cooking or heating of food, including a permanently-installed microwave oven, or total counter space exceeding 10 square feet.

Revisions to Addendum 3, Appendix C. Additional research was devoted to the Racially Disparate Impacts analysis contained in Addendum 3, Appendix C.

The original analysis anecdotally presumed that circumstances related to transient work force at the Port Angeles Coast Guard Station and OMC accounted for the differences in home owners verses renters. The data did not bare this out. The pivotal data shows disparity between rates of homeownership among white and non-white population segments. Without clear explanation of the discrepancies, the data suggests the presence of racially disparate impacts, displacement, or exclusion. The policy recommendations have been amended to address the issue.

Also, the problem that was also discussed regarding the difference in estimated household incomes had to do with discrepancy between *median household income*, and

median family of 4 household income. As a commonly used metric, we have retained the *median family of 4 household income* in the Addendum for consistency.

Proposed zoning changes in response to Commerce Letter. During the prior meeting, concern was expressed regarding proposed changes to the standards of the Zoning Code intended to address barriers to housing. Specifically, the changes provided in the 5/06/26 packet included measures intended to meet the County's obligation under the principle of *Reasonable Accommodations* per RCW 36.70a.070(2)(d), and as recommended by the Department of Commerce in their 4/13/26 Letter (Testimony #69).

The following table distills the proposed changes into categories and provides a description of the potential changes in development character and intensity for each.

Change Element	Description and Effect
Increase maximum residential density for multi-family housing. Zones include: URH, VLD, LD.	The change is provided as an incentive to increase development of multi-family dwellings (3 or more units). In the URH and VLD zones, urban services are limited, which will substantially reduce the number of projects experienced. In the LD zone, the change from density is 9 to 15 DU's/acre. Although the change provides significant capacity on paper, costs related to building and energy code still act as a barrier to significant development potential. For these reasons, the anticipated change is expected to be modest.
Increase maximum lot size for multi-family housing. Zones include: URH.	The maximum lot size standard prevents lot sizes that do not meet urban density standards (min. 4 DU's/acre) for traditional single-family dwellings. However, they also act as a barrier for multi-family development. As long as multiple units are being created, the lot size should be allowed to increase to accommodate building, parking, landscaping, etc. As noted, the URH zone is limited by available urban services (except Clallam Bay/Sekiu). This will limit the significance of this change but still allow for some expanded opportunity for multi-family projects.
Maximum lot size in zones where none currently exists. Zones include: LD, MD.	Same as above, the maximum lot size is intended to provide efficiency in lot sizes to ensure urban densities are achieved in UGAs. This was specifically cited by Commerce as a potential barrier. The change will assist the

	County in meeting its stated density objectives for each zone.
Uniform language for setback standards in all urban zones.	No change expected. New language captures what the Department already does.
Allowance of zero lot-line setback in all urban residential zones.	This feature is not expected to be widely implemented as it requires a covenant to address roof and exterior maintenance (all owners must agree). But it will help to facilitate townhouse style development, which is specifically identified under RCW 36.70A.070(2) as essential to increase housing affordability. Common walls and roofs help to reduce overall construction costs. Allowing them to be owned in fee increases economic status of the owners. It also makes more efficient use of available development space within UGAs.
Suspension of TDR program for all applicable zones.	As discussed, this will facilitate development at full densities within the Port Angeles and Sequim UGAs by removing this identified barrier.
Increase in minimum residential density. Zones include: LD, MD, VLD/LD, MD, CR-II, CR-III, CN, CC.	This affects the minimum density required for new subdivisions and ensures new development is concentrated at urban densities. The change varies depending on the availability of urban services (e.g. 4 to 5 DU's/acre for LD; 4 to 10 DU's/acre for MD). The goal is to ensure target densities are being achieved in new subdivisions consistent with the underlying zone.
Decrease side yard setbacks to 6-feet for all urban residential zones.	This will achieve more uniformity in urban development consistent with standards adopted in the cities of Sequim and Port Angeles, and the Carlsborg UGA.
Decrease minimum lot size. Zones include: S(R-III), S(R-IV).	This will allow greater flexibility for smaller lots to be created within the S(R-III) and S(R-IV) zones and improve opportunity for targeted densities to be achieved consistent with the underlying zones.

In general, the above changes are intended to encourage development that meets the targeted densities and housing types intended by the underlying zones, as required

under the GMA. In short, the changes will not change the character of the underlying zone as much as it will (hopefully) facilitate development consistent with the intent of the underlying zone. Another thing to consider is that all these changes will occur only in urban residential zones located exclusively within designated Urban Growth Areas. No changes are proposed within the rural or resource areas of the County.

Table 3.4, public testimony. Table 3.4 has been included in your packet. It contains testimony summary of policy recommendations for Testimony #57 through #81, which have yet to be discussed by the Planning Commission. The corresponding letters of testimony were provided in your May 6, 2026, packet but were not included in this packet. Completion of this review will complete the consideration of all public testimony before the Planning Commission on the CPU.

Draft Findings Resolution. In anticipated of wrapping up discussions, I have included a copy of the revised Draft Findings for the CPU. This is a Draft Resolution for the Board's signature, but the findings will be cited by the Planning Commission as part of their recommendation to the Board, assuming that recommendation is for approval. Please be ready with any suggested edits for discussion if you feel they are in order.

Other items. The following addresses other issues and concerns raised during the 5/06/26 meeting:

State regulations and other barriers. Addendum 1 to Appendix C was revised to discuss the barriers to housing created by current landlord/tenant regulations, Energy Code requirements, prevailing wage calculation processes, and limited water resources. These changes are provided under *Other Barriers*, towards the end of the Addendum (page 4-6), and discusses the roles these barriers play in reducing the County's ability to provide housing and economic opportunity.

Follow-up on ditch tightlining project. *Loper Bright Enterprises v. Raimondo* (June 28, 2024) overturned the Chevron Doctrine (*Chevron U.S.A., Inc. v. Natural Resources Defense Council, Inc.* (1984)). The Chevron Case afforded Federal agencies autonomy to interpret vague regulations and instructed courts to grant deference to the agency's "reasonable interpretation." *Loper Bright* removed that deference, instructing the courts they had the responsibility to interpret and apply regulations in their decision-making outside of the interpretations applied by the agencies.

In the matter of the ditch tightlining project, there does not appear to be any matters currently before the courts that would implicate *Loper Bright*. For the decision to apply, there must be an ambiguous law, interpretation by an agency, and a court must then assert their required review and interpretation of the law. The *Loper Bright* decision does not automatically presume an interpretation of a state agency is erroneous but simply grants the courts the responsibility to not assume the interpretation is correct. There is no case currently before the courts on this matter, and therefore no bearing of *Loper Bright* currently.

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

Sincerely,

A handwritten signature in blue ink that reads "Bruce W. Emery". The signature is fluid and cursive, with the first name "Bruce" being the most prominent.

Bruce Emery, Director
Clallam County DCD



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Memorandum

Date: May 12, 2026

To: Public

From: Bruce Emery, Director of Community Development

Re: Addendum 3, Housing Element Technical Analysis (Appendix C), Racially Disparate Impacts Analysis

In accordance with RCW 36.70A.070(2)(e) & (f), the Growth Management Act (GMA) requires Clallam County to identify policies and regulations that result in racially disparate impacts, displacement, and exclusion (RDI); and implement policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing. This Addendum to Appendix C provides the results of the County's review of its Comprehensive Plan policies and development regulations in the context of racially disparate impacts, displacement and exclusion potential.

Background. The Washington Department of Commerce compiled demographic data for Clallam County, dating back to 2020.¹ Although this information is slightly different from that contained in the Land Capacity Analysis (Appendix B) and the Housing Element Technical Analysis (Appendix C), it is useful for highlighting trends and providing RDI analysis. Based on this information, the following depicts the racial demographic profile of Clallam County as shown in Table 1, below:

Table 1: Racial Demographic Profile of Clallam County

Ethnicity	2015 Population	2020 Population	5-Year Change	Percent Change	2020 % of total
American Indian and Alaskan Native	3,198	3,580	382	11.9%	4.7%
Asian	1,046	1,065	19	1.8%	1.4%
Black or African American	612	708	96	15.7%	0.9%
Hispanic or Latino (of any race)	4,119	5,147	1,028	25.0%	6.7%
Native Hawaiian and Other Pacific Islander	43	26	-17	-39.5%	0.0%
Other Race	154	114	-40	-26.0%	0.1%
Two or more races	2,564	3,003	439	17.1%	3.9%
White	60,661	62,839	2,178	3.6%	82.2%
Totals:	72,397	76,482	4,085		100%

¹ Washington Department of Commerce, Obtained October 16, 2025, from:
https://www.ezview.wa.gov/site/alias__1976/38930/2025_periodic_updates.aspx

The information highlights that that Clallam County is not a widely demographically diverse region. However, growth in certain demographics, especially Hispanic or Latino, Black or African American, and American Indian and Alaskan Native, indicate that the demographic makeup is changing. With the exception of tribal members residing on tribal reservation land, there is generally no local or regionally identified areas fostering ethnically concentrated neighborhoods and the populations are generally intermixed and integrated throughout. This suggests that segregation is not evident in the communities across the County. The racial demographics between the County and its three Cities, with few exceptions, are generally consistent. One exception is the Hispanic or Latino ethnic group, which comprises around 19% of the population within the City of Forks, compared to 7% for the rest of the County. Although data specific to the unincorporated Forks Urban Growth area is not available, the Hispanic or Latino demographic within the City of Forks would suggest that a higher-than-County average also exists within the unincorporated UGA and vicinity. The population data is consistent with known economic trends related to the forest products industry.

According to the US Census Bureau, the County currently has a population of 78,550 (adjusted for 2024 by OFM), and employment rate of 46.3%, a median household income of \$90,400 (family of 4), a total of 39,993 housing units with 35,453 total households, and a college education rate (bachelor's degree or greater) of 33.2%. It has an older population (65 years and older) of 33.8% compared to a state average of 17.3%. Approximately 9.7% of the County's population is considered within the poverty level. The median gross rent in Clallam County is estimated at \$1,189 per month.

When considering Housing affordability, one key metric is the number of households within their own home verses households within rental units. Rentals include a higher degree of risk of price change impacting the ability of certain households to remain housed. According to the 2020 Commerce data, there were 32,953 households in Clallam County (less than OFM-adjusted 2024 data, above), including 23,194 owner households and 9,759 renter households. Based on the Commerce data, the following Table 2 includes details on home ownership and rental data by ethnicity:

Table 2. Home Ownership Households and Rental Households by Ethnicity

Ethnicity	Owner Households	Percent Owner	Renter Households	Percent Renter
American Indian or Alaskan Native	745	58%	535	42%
Asian	185	47%	210	53%
Black or African American	25	7%	340	93%
Hispanic or Latino (of any race)	800	60%	540	40%
Other Race	545	62%	330	38%
Pacific Islander	4	50%	4	50%
White	20,890	73%	7,800	27%
Total:	23,194		9,759	

The information in Table 2 indicates trends that could be considered exclusionary. The White ethnic category represents just over 82% of the population, yet accounts for 90% of all household home ownership and 73% home ownership within its own category. In contrast, Black or African American represents just 0.9% of the population, and only accounts for 0.1% of overall home ownership, including only 7% within its own category. Aside from these two extremes, Hispanic or Latino households account for 6.7% of the County's population, and 3.5% of overall home ownership, and 60% home ownership within its own category. This data suggests the possible presence of racially disparate impacts.

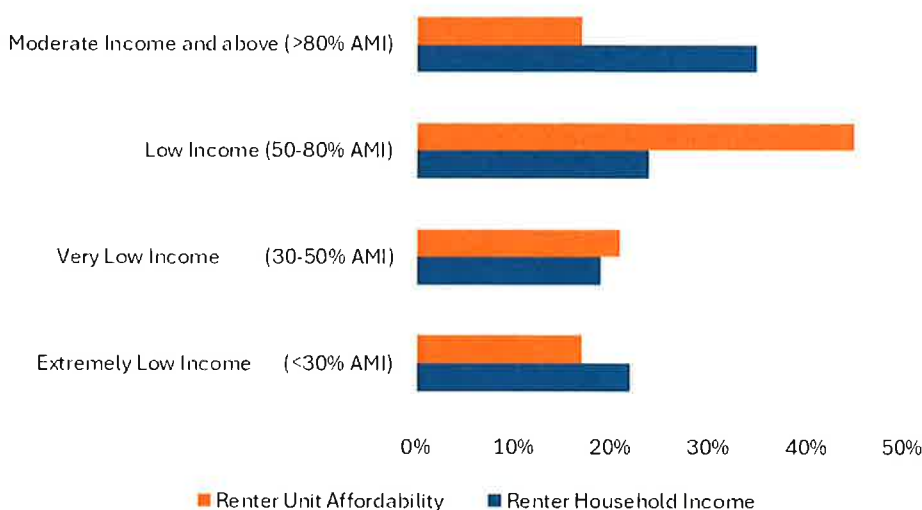
Clallam County is unique in its setting and economic history. The County is largely geographically isolated from the rest of Western Washington due to the Puget Sound and the Olympic Mountains. Historically, the economy for Clallam County was driven by timber, agriculture and fishing industries. Although these industries have substantially curtailed in recent decades, identifiable new industries have not clearly taken their place. Coupled with the geographic setting, there has been little to attract new wage earners to the region and immigration has largely been fueled by retirees. Illustrating this, the median age in Clallam County is 53.2 compared to a State median age of 38.7.² The result has been a slow progression towards increases in ethnic diversity.

The lack of clear causation of racially disparate impacts does not mean that exclusion is not taking place. As a retirement destination, competition for limited housing stock is increased by individuals migrating to the region from other locations with more robust real estate markets. The sale of a comparable home in the Seattle/Tacoma area would net 60 to 70% more than the same dwelling within Clallam County, giving the prospective seller an advantage when it comes to purchasing in Clallam County's housing markets. In contrast, a local family of four wishing to purchase has to compete for housing in which the median house prices is presently \$427,000. However, with a median household income within Clallam County of \$90,400, a family of four would only be eligible to purchase a home of around \$320,000, or \$107,000 under the current median price.

The obstacle this hypothetical "median-income family" faces is made substantially more challenging when we consider those household incomes that are below the median average. In most cases, renting is the only viable option but still suffers from a similar high demand market that artificially elevates the market price. To illustrate this impact, Figure 1 (below) shows the breakdown of renter households within the Extremely low (0 to 30% AMI), very low (30-50% AMI), Low (50-80% AMI) and moderate income (>80% AMI) households:

² Source: US Census Bureau, obtained May 11, 2026, from:
https://data.census.gov/profile/Clallam_County,_Washington?g=050XX00US53009#populations-and-people

Figure 1: Renter Household Income and Rental Unit Affordability



(Source: US HUD, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) (Table 8))

The information in Figure 1 sets forth on a market-wide basis the percent of the market within each income segment, and the percent of housing stock within the market that is available within the affordability range of each segment. Based on the information, substantial housing stock is needed in the Extremely low and moderate-income segments to meet current demand. What is also clear is that most of these housing segments require some level of supplemental funding to assist with rent costs to be affordable to the household income segment noted. The overall annual funding needed to assist income segment households with rental costs is identified in Addendum 2, Appendix C.

Policy and Regulation Analysis. The current land use and housing policies of the Comprehensive Plan and development regulations were analyzed to identify those policies and regulations that may be approaching, or are creating, challenges with respect to potential racially disparate impacts, displacement or exclusion. Recommendations were also developed for addressing the potentially impactful policy or regulation. The results are provided in Table 2, below:

Table 2: Land Use and Housing RDI Policy Review

Existing Policy/Regulation	Proposed Amendment	Explanation
Several passages referencing "citizens"	Amend to include "residents"	"citizens" excludes residents who may not be citizens but are members of the community.
Lacking policy to address displacement due to effects of climate change.	31.02.820(3)(b): "Align with the County's Climate Action Plan to collaborate with partners to incentivize building improvements and retrofits for residential and commercial buildings in the County to improve energy	Climate change can render residential structures marginal for habitation and increase displacement, especially to vulnerable populations. New policy

	efficiency, resilience, and justice... Specific activities to support energy justice may include upgrading cooling infrastructure in facilities serving vulnerable populations, and implementing alternatives like preserving and increasing tree cover, shade structures, and other passive cooling and heating designs. Prioritize incentives and assistance programs for cost burdened communities and ensure outreach is targeted towards and benefits vulnerable populations, such as those who live in multifamily and affordable housing units.”	works to mitigate these impacts.
Lacking policy to address displacement due to effects of climate change.	31.02.820(5)(a): “Encourage the development and implementation of culturally relevant educational programs to communicate and provide targeted, accessible engagement around immediate and future climate change threats and methods... Equitably distribute funds for climate resilience engagement opportunities in the most affected communities, with a focus on equity and underrepresented groups.	Cost-burdened communities are typically more susceptible to the impacts of climate change and are more at risk of displacement as a result. Proactively providing information and assistance on methods for improving resilience can reduce this risk.
Lacking policy to address displacement due to effects of climate change.	31.02.820(8)(d) “Integrate climate impacts into the planning and coordination of operations for preparedness, response, and recovery activities among County departments, Tribes, first responders and partners, including public health, law enforcement, fire, school, and emergency medical services (EMS) personnel. This may include... assessing and improving the adaptive capacity of people who are most vulnerable to climate change-exacerbated hazards, such as Elders or people living in high-risk areas.	Focusing on the most vulnerable populations to instill climate resilience with further safeguards against climate-induced displacement.

Lacking policy to address displacement due to effects of climate change.	31.02.820(9)(a): "Promote health impact assessments and other tools to address health, equity, and climate change impacts on vulnerable communities in the County such as Tribal communities, the elderly, residents who are cost-burdened, those with existing health conditions, and mobile home communities."	Policy to address proactively safeguarding vulnerable populations against climate-related impacts and related displacement potential.
Lacking policy to address environmental justice.	31.02.100(3): "Clallam County shall give special consideration to achieving environmental justice when implementing land use goals and policies, including efforts to avoid creating or worsening environmental health disparities in accordance with RCW 36.70A.070."	General policy to proactively address and implement environmental justice with the implementation of land use goals and policies, to help avoid displacement from adverse conditions.
Lacking policy to address economic displacement.	31.02.280(3)(f): The Department of Commerce provided a <i>Draft Displacement Risk Map</i> and supporting data in 2023 to assist jurisdictions in determining areas potentially at risk of displacement with increased community development. The Map identified two key areas within Clallam County that may meet the high-risk threshold for displacement potential... Standards, techniques and resources should be developed that address the risk of housing displacement as these and other areas within Clallam County develop.	General policy to proactively address displacement risks tied to economic conditions of two subareas of the County.
Lacking policy to address gentrification.	31.02.281(2): Development regulations within urban growth areas should focus on adequate provisions for affordable housing opportunities, especially for moderate, low, very low, and extremely low-income households... [M]easures should be developed to avoid	General policy to proactively address displacement risks related to changes from economic growth.

	displacement of existing low, very low, and extremely low-income households as local communities develop and improve, resulting in a commensurate increase in property values. Assistance programs and continued monitoring should be established to evaluate and respond to avoid active displacement.	
Identify and remove regulatory barriers that limits access to or provision of affordable housing supply.	Analysis under Appendix C and Addendum 1, along with the proposed changes to urban residential zoning regulations.	Proposed changes are designed to facilitate moderate and high-density residential housing types that help to meet affordability targets identified with the Land Capacity Analysis (Appendix B).

Conclusions on Racially Disparate Impacts. The information contained in Appendix C and further analyzed herein does support the existence of racial disparity in housing. Specific policies or circumstances that could have the potential to create racially disparate impacts were identified and addressed under Table 2 above. The historic and current demographic profile of the County coupled with changing economic conditions has created an exclusionary environment based on economics. The County should carefully consider the potential for racially disparate policies into the future as changes in the demographic makeup of the County, such as increases in the Hispanic or Latino population experienced recently, occur in the future. As for the need currently demonstrated by the data, it is apparent the County should take steps to increase opportunity for higher-density housing options to broaden the range of affordable housing stock, such as those identified Addendum 1, Appendix C. Such efforts will begin to address the affordability gap and reduce the exclusionary barriers created by lack of affordable housing options.

If you have any questions, please feel free to contact me at 360-417-2323 or by email at bruce.emery@clallamcountywa.gov.

Sincerely,



Bruce Emery, Director
Clallam County DCD

Propose Development Regulation and Policy Amendments to address Concerns Raised by the Department of Commerce

May 12, 2026

The Department of Commerce provided a written response, dated April 13, 2026, to the Draft Periodic Update documents submitted on behalf of Clallam County. The Commerce review letter included constructive suggestions for improving the Draft documents and supporting documentation with respect to the requirements of the Growth Management Act. The following Comprehensive Plan policy and development regulation amendments are being suggested as changes to the County Code in response to suggestions provided by Commerce.

Recommended changes to the Zoning Code

33.13.010 Urban Residential High Density (URH).

- (4) *Maximum Residential Density.* One dwelling unit per 12,500 square feet, provided this density may be increased to 10 dwelling units per acre for multiple-family dwellings.
- (5) *Maximum Lot Size.* 21,500 square feet, unless the remaining lot in a subdivision is greater than five (5) acres and capable of being redivided, provided further that the maximum lot size may be increased 4,800 square feet for every unit over five total units for multiple-family dwellings.
- (6) Minimum Lot Size: 7,000 square feet.
- (7) Setbacks:
 - (a) Front yard – forty-five (45) feet from the centerline of the right-of-way of a local access street, fifty (50) feet from the centerline of an arterial street, sixty (60) feet from the centerline of a highway, or 15-feet from the property line, whichever is greater.
 - (b) Side yard – ~~six~~eight (68) feet (forty (40) feet from the centerline of the right-of-way of a side street). A zero-side yard setback may be allowed provided a covenant is filed with the Clallam County Auditor that, at a minimum, addresses agreement on maintenance schedules, material selection and color choice for the roof and exterior of the building.
 - (c) Rear yard – fifteen (15) feet (forty (40) feet from the centerline of the right-of-way of a rear street).

33.13.030 Urban Very Low Density (VLD).

- (4) *Maximum Residential Density.* One dwelling unit per 21,500 square feet, provided this density may be increased to 6 dwelling units per acre for multiple-family dwellings.
- (5) *Minimum Lot Size.* 12,500 square feet.
- (6) *Minimum Lot Width.* Fifty (50) feet.
- (7) *Maximum Width to Depth Ratio.* 1:5 (0.20).
- (8) *Setbacks.*
 - (a) Front yard – forty-five (45) feet from the centerline of the right-of-way of a local access street, fifty (50) feet from the centerline of an arterial street, sixty (60) feet from the centerline of a highway, or 15-feet from the property line, whichever is greater.
 - (b) Side yard – ~~six~~eight (68) feet (forty (40) feet from the centerline of the right-of-way of a side street). A zero-side yard setback may be allowed provided a covenant is filed with the Clallam County Auditor that, at a minimum, addresses agreement on maintenance schedules, material selection and color choice for the roof and exterior of the building.
 - (c) Rear yard – fifteen (15) feet (forty (40) feet from the centerline of the right-of-way of a rear street).
- (9) *Open Space Overlay:* When Urban Very Low Density zoning districts contain contiguous critical areas they are identified by an Open Space Overlay/(OS) designation which identifies them as an area from which development rights may be transferred.
- (10) *Land Divisions.* Divisions of land are subject to the following additional requirements:
 - (a) *Connection to Public Water Supply.* All new lots shall be connected to a public water supply. Land divisions of two (2) lots or less located more than 200 feet from a public water system, as measured along existing public right-of-way or utility easement, are not required to connect to a public water supply, except where necessary to comply with State and County health code requirements for potable water.
 - (b) *Connection to Public Sanitary Sewer.* All new lots shall be connected to public sanitary sewer services, if available within 200 feet of the land division, as measured along existing public right-of-way or utility easement.

33.13.040 Urban Low Density (LD).

(4) *Maximum Residential Density.* Nine (9) dwelling units per acre, provided this density may be increased to 15 dwelling units per acre for multiple-family dwellings.

(5) *Minimum Lot Size.* 4,840 square feet.

(6) Maximum Lot Size. 10,000 square feet, provided that the maximum lot size may be increased 4,800 square feet for every unit over 3 total units for multiple-family dwellings.

(76) Setbacks.

(a) Front yard – forty-five (45) feet from the centerline of the right-of-way of a local access street, fifty (50) feet from the centerline of an arterial street, sixty (60) feet from the centerline of a highway, or 15-feet from the property line, whichever is greater.

(b) Side yard – ~~six~~eight (68) feet (forty (40) feet from the centerline of the right-of-way of a side street). A zero-side yard setback may be allowed provided a covenant is filed with the Clallam County Auditor that, at a minimum, addresses agreement on maintenance schedules, material selection and color choice for the roof and exterior of the building.

(c) Rear yard – fifteen (15) feet (forty (40) feet from the centerline of the right-of-way of a rear street).

(87) Land Divisions. Divisions of land are subject to the following additional requirements:

(a) *Minimum Residential Density.* ~~Five~~our (54) dwelling units per acre with the following exceptions:

(i) Land divisions where each lot is five (5) acres (or 1/128 of a standard section) or larger.

(ii) Land divisions creating four (4) lots or less located more than 200 feet from a public sanitary sewer, as measured along an existing public right-of-way or utility easement.

(b) *Connection to Public Water Supply.* All new lots shall be connected to a public water supply. Land divisions of two (2) lots or less located more than 200 feet from a public water system, as measured along existing public right-of-way or utility easement, are not

required to connect to a public water supply, except where necessary to comply with State and County health code requirements for potable water and sewage disposal.

(c) *Connection to Public Sanitary Sewer.* All new lots shall be connected to public sanitary sewer services, if available within 200 feet of the land division, as measured along existing public right-of-way or utility easement.

33.13.050 Urban Very Low Density/Low Density (VLD/LD).

(4) *Maximum Residential Density.*

~~(a) Two (2) dwelling units per acre without purchase of development rights.~~

~~(b) Nine (9) dwelling units per acre with purchase of development rights.~~

(5) *Minimum Lot Size.* 4,840 square feet.

(6) *Setbacks.*

(a) Front yard – forty-five (45) feet from ~~the centerline of the right-of-way of~~ a local access street, fifty (50) feet from ~~the centerline of~~ an arterial street, sixty (60) feet from ~~the centerline of~~ a highway, ~~or 15-feet from the property line, whichever is greater.~~

(b) Side yard – ~~sixeight~~ (68) feet (forty (40) feet from the centerline of the right-of-way of a side street). ~~A zero-side yard setback may be allowed provided a covenant is filed with the Clallam County Auditor that, at a minimum, addresses agreement on maintenance schedules, material selection and color choice for the roof and exterior of the building.~~

(c) Rear yard – fifteen (15) feet (forty (40) feet from the centerline of the right-of-way of a rear street).

(7) *Transfer of Development Rights.* ~~[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.]~~

(a) Development rights may be transferred from any urban property located within an Urban Very Low Density/Open Space Overlay zone or any rural property located within an Open Space Overlay Corridor. Development rights may be utilized to increase densities in

the VLD/LD zoning district utilizing the transfer of development rights process of Chapter 33.26 CCC.

(b) The base density of the VLD/LD zoning district shall not be increased above nine (9) dwelling units per acre.

(8) *Land Divisions*. Divisions of land are subject to the following additional requirements:

(a) *Minimum Residential Density*. ~~Five~~^{four} (54) dwelling units per acre with the following exceptions:

(i) Land divisions where each lot is five (5) acres (or 1/128 of a standard section) or larger.

(ii) Land divisions creating four (4) lots or less located more than 200 feet from a public sanitary sewer, as measured along an existing public right-of-way or utility easement.

(b) *Connection to Public Water Supply*. All new lots shall be connected to a public water supply. Land divisions of two (2) lots or less located more than 200 feet from a public water system, as measured along existing public right-of-way or utility easement, are not required to connect to a public water supply, except where necessary to comply with State and County health code requirements for potable water and sewage disposal.

(c) *Connection to Public Sanitary Sewer*. All new lots shall be connected to public sanitary sewer services, if available within 200 feet of the land division, as measured along existing public right-of-way or utility easement.

33.13.060 Urban Moderate Density (MD).

(4) *Maximum Residential Density*. Fifteen (15) dwelling units per acre.

(5) *Minimum Lot Size*. 4,840 square feet.

(6) *Maximum Lot Size*. 10,000 square feet, provided that the maximum lot size may be increased 4,800 square feet for every unit over 4 total units for multiple-family dwellings.

(6) *Setbacks*.

(a) Front yard – forty-five (45) feet from the centerline of the right-of-way of a local access street, fifty (50) feet from the centerline of an arterial street, sixty (60) feet from the centerline of a highway, or 15-feet from the property line, whichever is greater.

(b) Side yard – ~~six~~eight (68) feet (forty (40) feet from the centerline of the right-of-way of a side street). A zero-side yard setback may be allowed provided a covenant is filed with the Clallam County Auditor that, at a minimum, addresses agreement on maintenance schedules, material selection and color choice for the roof and exterior of the building.

(c) Rear yard – fifteen (15) feet (forty (40) feet from the centerline of the right-of-way of a rear street).

(7) *Land Divisions.* Divisions of land are subject to the following additional requirements:

(a) *Minimum Residential Density.* Four (4) dwelling units per acre with the following exceptions:

(i) Land divisions where each lot is five (5) acres (or 1/128 of a standard section) or larger.

(ii) Land divisions creating four (4) lots or less located more than 200 feet from a public sanitary sewer, as measured along an existing public right-of-way or utility easement.

(b) *Connection to Public Water Supply.* All new lots shall be connected to a public water supply. Land divisions of two (2) lots or less located more than 200 feet from a public water system, as measured along existing public right-of-way or utility easement, are not required to connect to a public water supply, except where necessary to comply with State and County health code requirements for potable water and sewage disposal.

(c) *Connection to Public Sanitary Sewer.* All new lots shall be connected to public sanitary sewer services, if available within 200 feet of the land division, as measured along existing public right-of-way or utility easement.

33.19.050 Sequim Urban Growth Area, Bulk and Dimensional Standards.

Table 33.19.050(2)(A). Bulk, Dimensional and General Requirements

Zone	Minimum (feet)							Maximum		
	Lot Size	Lot Width	Required Setbacks ¹					Lot Coverage	Building Height (feet)	Residential Density
			Front			Side (each)	Rear			
			Access Road	Collector Road	Arterial Road					
S(R-II)	9,000 square feet	50'	1520'	1525'	2035'	640'	15'	50%	35'	4 du/acre without TDR ² OR up to 5 du/acre with TDR
S(R-III)	96,000 square feet for single-family 96,000 square feet plus 2,000 square feet per additional unit for duplex and	50'	1520'	1525'	2035'	640'	15'	50%	35'	4 du/acre without TDR ² OR up to 10 du/acre with TDR

Zone	Minimum (feet)							Maximum		
	Lot Size	Lot Width	Required Setbacks ¹					Lot Coverage	Building Height (feet)	Residential Density
			Front			Side (each)	Rear			
			Access Road	Collector Road	Arterial Road					
	multifamily residences regardless of the number of buildings									
S(R-IV)	65,000 square feet for single-family 65,000 square feet plus 2,000 square feet per additional unit for duplex	50'	1520'	1525'	2035'	610'	15'	50%	50'	4 du/acre without TDR ² OR up to 16 du/acre with TDR

Zone	Minimum (feet)							Maximum		
	Lot Size	Lot Width	Required Setbacks ¹					Lot Coverage	Building Height (feet)	Residential Density
			Front			Side (each)	Rear			
			Access Road	Collector Road	Arterial Road					
	and multifamily residences regardless of the number of buildings									
S(RDP)	2 acres	100'	25'	50'	50'	100' ³	100' ³	50%	50'	N/A

¹ Setbacks are measured as per subsection (5) of this section. Where required setbacks under the International Building Code adopted by Clallam County differ from the minimum setbacks established in this table, the more restrictive regulation shall apply.

² Clallam County will allow for a maximum residential density of four dwelling units per acre without the transfer of development rights from lands zoned Agricultural Retention. Residential density greater than four dwelling units per acre up to the maximum allowed residential density of the zone (see above) shall require transfer of development rights from an Agricultural Retention zoned lot(s) pursuant to subsection (3) of this section. The requirement for the purchase or transfer of development rights shall not apply to the construction of up to two dwelling units on a legal lot of record created prior to July 28, 1998. [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 and the full density allowed by the underlying zone is in effect.]

3 Setback applies in the S(RDP) zone where abuts adjacent rural or urban residential land use and zoning districts.

4 For all residential zones, A zero-side yard setback may be allowed provided a covenant is filed with the Clallam County Auditor that, at a minimum, addresses agreement on maintenance schedules, material selection and color choice for the roof and exterior of the building.

(3) *Transfer of Development Rights.* This chapter designates the S(R-II), S(R-III), and S(R-IV) residential zones as receiving areas of transferable development rights from lands designated Agricultural on the Official Sequim-Dungeness Regional Comprehensive Plan Map, as amended, consistent with CCC [31.03.230\(6\)\(a\)](#), Comprehensive Plan Policy 10. Table 33.19.050(2)(A) establishes the residential density for which transfer and/or purchase of transferable development rights shall be required within the S(R-II), S(R-III), and S(R-IV) zones. The actual transfer and/or purchase of transferable development rights shall follow the requirements as set forth under Chapter [33.26](#) CCC. [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 and the full density allowed by the underlying zone is in effect.]

(4) *Exceptions.* The bulk, dimensional and general requirements set forth in subsection [\(2\)](#) of this section shall apply to specifically permitted and conditional uses tabulated in CCC [33.19.040](#), excepting the following:

- (a) The maximum building height provided in subsection [\(2\)](#) of this section shall not apply to antennas; provided, that antennas are set back from all exterior property lines at a minimum ratio of one foot of setback for every three feet of vertical height as measured from grade.
- (b) Antennas, satellite dishes, or other communication devices shall not be located in the front setback area.
- (c) No structures, excepting fences and berms, shall be placed within the front setback area.

(d) Planned unit developments approved consistent with this title and CCC Title 29, Clallam County Land Division Code, may specifically delineate setback, bulk, height or dimensional requirements which differ from these standards.

(5) *Measurement of Setbacks.* All setbacks shall be measured from the lot line to the foundation of any building as defined in Chapter 33.03 CCC.

(6) *Sight Clearance.* In all zones, corner lots shall maintain, for safety purposes, a triangular area in which no physical obstruction, such as a structure, fence, tree or shrub higher than 36 inches above grade shall be permitted. Such triangular area shall have one angle formed by the front lot line and the side lot line separating the lot from the side street, the length of which lot line sides of the triangle shall be 15 feet. The third side of the triangle shall be a line connecting the two lot lines at the 15-foot point on each.

(7) *Road Classifications.* The purpose of establishing road classifications is to clarify the setbacks for development activities consistent with the requirements of this section. The following road designations shall apply to the following streets maintained by either City of Sequim, Clallam County, or Washington Department of Transportation that are within the Sequim urban growth area; all roads not specifically listed shall be classified as an access road:

Arterials	Collectors
SR 101 By-Pass	N. Brown Road
Existing Highway 101	Hendrickson Road
Old Olympic Highway	Keeler Road
Sequim-Dungeness Way	Miller Road
North Sequim Avenue	Port Williams Road
Priest Road	River Road

Arterials	Collectors
SR 101 By-Pass South Frontage Road	Still Avenue
Third Avenue	West Sequim Bay Road

33.20.050 Carlsborg Urban Growth Area, Bulk and Dimensional Standards.

Table 33.20.050(2)(A). Bulk, Dimensional and General Requirements:

Carlsborg Residential, Commercial, and Mixed Zones

Zone	Minimums								Maximums	
	Lot Size	Lot Width	Required Setbacks ¹					Minimum Residential Density	Building Height	Residential Density
			Front			Side (each)	Rear			
			Access Road	Collector Road	Arterial					
CR-I	None	None	15 ft.	15 ft.	2060 ft.	6 ft.	10 ft.	4 dwelling units per acre ³	36 ft.	6 dwelling units per acre
CR-II	None	None	15 ft.	15 ft.	2060 ft.	6 ft.	10 ft.	64 dwelling units per acre ³	36 ft.	8 dwelling units per acre

Zone	Minimums								Maximums	
	Lot Size	Lot Width	Required Setbacks ¹					Minimum Residential Density	Building Height	Residential Density
			Front			Side (each)	Rear			
			Access Road	Collector Road	Arterial					
CR-III	None	None	15 ft.	15 ft.	2060 ft.	6 ft.	10 ft.	84 dwelling units per acre ³	36 ft.	10 dwelling units per acre
CN	None	None	15 ft.	15 ft.	None	Zero ²	Zero ²	84 dwelling units per acre ³	36 ft.	10 dwelling units per acre
CGC	None	50 ft.	45 ft.	50 ft.	60 ft.	Zero ²	Zero ²	Not Applicable	36 ft.	Not Applicable
CI	0.5 acre ²	50 ft.	Zero ²	Zero ²	Zero ²	Zero ²	Zero ²	Not Applicable	36 ft.	Not Applicable
CC	None	50 ft.	45 ft.	50 ft.	60 ft.	Zero ²	Zero ²	84 dwelling units per acre ³	36 ft.	10 dwelling units per acre

¹ Where required setbacks under the International Building Code adopted by Clallam County differ from the minimum setbacks established in Chapter 33.03 CCC the more restrictive regulation shall apply.

² Subject to the International Building Code, side and rear yard setbacks for commercial uses shall be a minimum of 15 feet when abutting a residential zone.

³ See CCC 33.20.070, minimum density standards.

4 In all residential zones, A zero-side yard setback may be allowed provided a covenant is filed with the Clallam County Auditor that, at a minimum, addresses agreement on maintenance schedules, material selection and color choice for the roof and exterior of the building.

(3) *Exceptions.* The bulk, dimensional and general requirements set forth in subsection (2) of this section shall apply to specifically permitted and conditional uses tabulated in CCC 33.20.040, excepting the following:

(a) The maximum building height provided in subsection (2) of this section shall not apply to antennas; provided, that antennas are set back from all exterior property lines at a minimum ratio of one foot of setback for every three feet of vertical height as measured from grade.

(b) Antennas, satellite dishes, or other communication devices shall not be located in the front setback area.

(c) No structures excepting signs, fences and berms shall be placed within the front setback area.

(d) Planned unit developments approved consistent with this title and CCC Title 29, Subdivisions, may specifically delineate setback, bulk, height or dimensional requirements which differ from these standards.

(4) *Sight Clearance.* In all zones, corner lots shall maintain a triangular safety zone consisting of an area in which no physical obstruction, such as a structure, fence, tree or shrub higher than 36 inches above grade shall be permitted. Such triangular area shall have one angle formed by the front lot line and the side lot line separating the lot from the side street, the length of which lot line sides of the triangle shall be 15 feet. The third side of the triangle shall be a line connecting the two lot lines at the 15-foot point on each.

(5) *Road Classifications.* The purpose of establishing road classifications is to clarify the setbacks for development activities consistent with the requirements of this section. The following road designations shall apply to the following streets maintained by either Clallam County or Washington State Department of Transportation that are within the Carlsborg UGA; all roads not specifically listed shall be classified as local access roads:

Arterials	Collectors
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State Route 101	Atterberry Rd.
	Carlsborg Rd.
	E. Runnion Rd.
	Hooker Rd.
	Mill Rd.
	Taylor Cutoff Rd.

33.40.100 No Prohibition on Temporary Accommodations by Religious Organizations.

In accordance with RCW 36.01.290, Clallam County will not prohibit temporary housing, safe parking, or other temporary overnight accommodations on land owned by a religious organization. Clallam County may consider reasonable provisions for life-safety, sanitation, or other critical standards, provided said standards do not conflict with RCW 36.01.290 or RCW 35.21.915.

33.48.030 Agricultural Accessory Uses, Applicability

To be eligible for the accessory agricultural uses specified in this chapter, a farm on which such uses are conducted must meet all of the following:

- (1) Contain a minimum of one acre of land utilized in the production of agricultural products.
- (2) Is located within a Rural or Resource zoning district in which agricultural activities are listed as an allowed use per the underlying zoning of the property.

Uses that assist with storage, distribution and marketing of locally produced agricultural products, including support services that facilitate these activities, will be allowed within agricultural operations. A temporary farm stand is not restricted by the conditions stated in subsections (1) and (2) of this section and is considered to be an allowed accessory use of any agricultural

operation in which agricultural activities are permitted by the underlying zone, including Rural, Resource and Urban zoning districts.

All other agricultural accessory uses proposed on farms that fail to meet the above applicability standards may be considered through a conditional use permit utilizing the standards outlined in this chapter as well as additional standards specific to the proposal.

33.48.050 Agricultural Accessory Uses, General Requirements.

(4) *Placement.* All agricultural accessory uses, including new buildings, parking, or supportive uses, should be located inside the general area already developed for buildings and residential uses and must not otherwise convert more than 25 percent of land to accessory uses. Non-agricultural accessory uses and activities that are related to and consistent with the size, scale and intensity of the existing agricultural use, that also support the economic viability of the agricultural operation, including new buildings, parking, and supportive uses, will be allowed within the intensively developed portion of the agricultural property and shall not otherwise convert more than one acre of agricultural land, or 15% of the net property acreage not to exceed two acres in total, to nonagricultural uses. Non-agricultural accessory uses shall be focused on the least agriculturally productive portion of the property.

33.50.060 Satellite bedrooms.

A satellite bedroom, as defined under CCC 33.03.010(94), is not an Accessory Dwelling Unit and may not be used as an Accessory Dwelling Unit as described elsewhere in this Chapter. A satellite bedroom may be allowed in conjunction with a single-family dwelling in accordance with the following requirements:

- 1) There shall be no more than one satellite bedroom allowed per lot.
- 2) The satellite bedroom must be approved as habitable space and consist of no more than one room, except that the satellite bedroom may include a bathroom.
- 3) The exterior of the building of a satellite bedroom shall not exceed 1/3rd of the gross floor area of the primary dwelling or 450 square feet, whichever is greater.
- 4) There shall be no more than 30 feet of separation between the satellite bedroom and the primary dwelling. The satellite bedroom must be placed consistent with all structural setbacks of the underlying zone.

5) The satellite bedroom must share the same water and wastewater disposal system with the primary dwelling. Said systems must be reviewed and approved as adequate to serve the primary dwelling and satellite bedroom.

6) To ensure the satellite bedroom remains separate and distinct from an accessory dwelling unit, the satellite bedroom shall not contain a kitchen or related kitchen facilities, including any improvements arranged for or conducive to the preparation or cooking of food, as demonstrated by inclusion of three or more of the following items: propane gas outlet, 220 AC electrical outlet, double sink, bar sink exceeding one square foot, hot water line to any bar sink, refrigerator exceeding 5 cubic feet or a place designed for accommodating a refrigerator exceeding 5 cubic feet, garbage disposal, dishwasher or space designed for a dishwasher, any device designed for cooking or heating of food, including a permanently-installed microwave oven, or total counter space exceeding 10 square feet.

7) Satellite bedrooms do not qualify as and shall not be made available for Vacation Rentals or as part of a Bed and Breakfast Inn.

Recommended Changes to the Comprehensive Plan

CCC 31.02.300 Public Utilities, Facilities and Services.

(8) *Essential Public Facilities. (Policy 17)* Essential public facilities are public capital facilities of a County-wide or State-wide nature which are typically difficult to site. Essential public facilities may be located in designated commercial forest or rural lands provided the County finds that such facilities cannot otherwise be located in urban areas, are largely self-contained or served by urban governmental services in a manner that adjacent rural or urban development is not promoted, and the facility does not cause nuisances (noise, dust, light, etc.) on adjacent properties that cannot be adequately mitigated. A process for determining and siting of essential public facilities shall be developed that addresses the following:

- (a) The conditional use permit process will be utilized to ensure adequate consideration of operational characteristics and site conditions that, if left unaddressed, could introduce significant impacts to neighboring properties.
- (b) The siting of essential public facilities in resource lands should not interfere with resource management on adjacent resource lands.
- (c) Avoids to the degree practicable existing rural and urban neighborhoods where impacts may be unavoidable.

- (d) Favors larger parcels where adequate room exists for addressing potential impacts from operational characteristics.
- (e) Considers alternatives for site selection that will substantially meet facility objectives but with reduced potential for impacts on neighboring properties or facilities.
- (f) Considers the adequacy of transportation facilities and other facilities and services needed to adequately provide for the new facility.
- (g) Considers the periodic performance review of essential public facilities to ensure adequate measures to reduce or mitigate potential impacts from operational characteristics are being addressed.
- (g)(h) In accordance with RCW 36.70A.200(5)(a), it is the intent of this policy and related review criteria not to preclude the siting of essential public facilities, but to allow for reasonable conditions deemed necessary to address project compatibility and mitigation of potential impacts.

Clallam County Comprehensive Plan Update

Summary of Public Testimony and Corresponding Recommendations

as of April 28, 2026, Table Version 3.4

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
57) Letter from Virginia Shogren, dated April 1, 2026. The testimony requests a moratorium on the continuation of the irrigation system tightlining project, and requests historical protections for the remaining ditch network.	Response provided in Memorandum of April 6, 2026, regarding <i>Public Testimony concerning the tightlining of irrigation ditches in the Sequim-Dungeness Valley</i> . Staff has provided a Supplemental Report on this issue to the Planning Commission, dated April 29, 2026, and included in the 5/6/26 Packet.
58) Email from Wendy Clark, Transportation Program Manager, Jamestown S'Klallam Tribe, dated April 1, 2026. Comments include: a) Request 2 nd sentence under 31.08.380 be amended to read: "To ensure adequate opportunity for public and <u>tribal</u> engagement and involvement and full consideration by the Planning Commission..." b) Regarding 31.03.130, Table 3, <i>Substandard Road Widths</i> , concern that Chicken Coop Road was removed and Palo Alto Road was retained. c) Concerns regarding the outdated reference to the FEIS for the Palo Alto to O'Brien Road corridor study.	a. Recommend the requested policy edit as consistent with RCW 36.70A.040 and .210. b. There were two entries for Chicken Coop Road. One was removed. Palo Alto Road continues to show substandard widths according to the Road Department. c. Recommend edits to 31.03.140(1)(a): "Encourage the Washington State Legislature and Washington State Department of Transportation to complete the improvements to the Highway 101 corridor for the City of

d) Concern about inclusion of "US 101 FEIS from Palo Alto to O'Brien Road," given it is nearly 30 years old and mentioned more than once in the Regional Plan. It should be included as a supporting document. e) Suggestion that the City of Sequim provide updated transportation policy to replace the completed projects under 31.03.310(4). f) Concern that Diamond Point Road is federally classified for truck traffic (T-3 rating), which appears to conflict with 31.03.320(5)(a), which states "...road standards should be more rural in nature."	Sequim's Simdars Road Interchange and Bypass project as outlined in the Final Environmental Impact Statement for the Palo Alto to O'Brien Road corridor." Recommend edits to 31.02.420(1)(c)(i): "Insist upon the State Legislature and Department of Transportation to complete improvements for the <u>City of Sequim's Simdars Road Interchange and Bypass project in the Sequim-Dungeness subregion as described in the final environmental impact statement for SR 101, Palo Alto to O'Brien Road."</u> d. Recommend the following edit to 31.03.140(1)(a): "Encourage the Washington State Legislature and Washington State Department of Transportation to complete the improvements to the Highway 101 corridor for the <u>City of Sequim's Simdars Road Interchange and Bypass projects outlined in the Final Environmental Impact Statement for the Palo Alto to O'Brien Road corridor."</u> e. Recommend the following edit to 31.03.310(4): "<u>Transportation (Policy 6). Coordinate with the City of Sequim on improving multi-modal circulation patterns and connections inside and adjacent to around the Sequim urban growth area.:</u> (a) Encourage improvements to the circulation patterns within the City, including consideration of interim measures to reduce congestion until the Sequim Bypass is constructed and mobility improvements to West Sequim Bay Road. See also <u>p</u>Paths, <u>t</u>Trails and <u>s</u>Sidewalk policies in CCC <u>31.03.140(4).</u>" f. Recommend the following edit to 31.03.320(5)(a): "Policy 7. Since Diamond Point and Sunshine Acres are geographically confined, roads within the development are not expected to carry large traffic volumes, <u>except for Diamond Point Road,</u> and road standards should be more rural in nature."
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g) Noted that Jamestown S'Klallam Tribe transferred to trust land adjacent to SR 101 at Miller Peninsula, suggesting update to 31.03.415(6)(c). h) Noted that the last sentence under 31.03.435(4) is non-binding; suggests removal. i) Noted that the Dungeness Nature Center is complete, suggesting an update to 31.03.455(6)(b).	g. Suggest the following amendment to 31.03.415(6)(c): “Policy 15. Commercial development at the intersection of Diamond Point Road and US 101 or at any point along US 101 between the eastern Clallam County line and the Blyn rural center will be discouraged as sufficient areas for commercial development have been provided within the Diamond Point/Sunshine Acres and Blyn rural centers. Should tThe Jamestown S'Klallam Tribe <u>has</u> put its ownership in the vicinity of the intersection of Diamond Point Road and US 101 into tribal trust status. <u>The County will work with the Tribe to encourage that future use of the trust lands is done so consistent with the goals and policies of the Comprehensive Plan in order to allow commercial development of this site contrary to the direction provided by local residents as expressed in the Sequim-Dungeness Regional Plan, then such development shall not provide any justification for adjacent commercial development of lands under Clallam County jurisdiction.</u>” h. Suggest the following amendment to 31.03.435(4): Future development by the Jamestown S'Klallam Tribe in the Blyn LAMIRD will require increased public services, particularly police and fire. Future development plans should be carefully coordinated with those service providers. It is also assumed that some services will be provided by the Tribe and would be open to local residents. i. Project is complete. Suggest removing 31.03.455(6)(b): (b) Policy 11. The Jamestown S'Klallam Tribe is planning a natural history center adjoining the Dungeness River; this location would be adjoining the Railroad Bridge Park. The Dungeness River Greenway Concept Plan also envisions other public access potential along portions of the Dungeness River in this area, if cooperatively implemented with landowners.
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j) Policies 31.03.455(6)(b), .465(5)(c) and .475(4)(b), refer to the Dungeness River Greenway Concept Plan. Requests including the plan as a supporting document.	j. There is no record of any formal adoption of the Dungeness Greenway Concept Plan. The overall intent of these policies has been implemented. Recommend eliminating 31.03.455(6)(b). Recommend edits to 31.03.465(5)(c): “Policy 11. A nonmotorized trail segment is a possibility along the Dungeness River if the landowners agree. The Dungeness River Greenway Concept Plan identifiesConsider use of the dike on the east side of the River between Sequim-Dungeness and Woodcock for potential public access.” Recommend edits to 31.03.475(4)(b): “Policy 8. A nonmotorized trail segment is a possibility along the Dungeness River if the landowners agree. The Dungeness River Greenway Concept Plan identifiesConsider use of the dike on the east side of the River between Sequim-Dungeness and Woodcock for potential public access.”
k) Notes that there is no reference to the 2022 OFM population projections in the June, 2025 Regional Transportation Plan by the PRPTO. Requests removal.	k. The official comments from Thera Black, PRTP0 (10/14/2025), specifically stated the PRTP0 based their long-range forecast on the 2022 OFM data.
l) Requests removal of reference to levels of service (LOS) for Transit service under 31.02.425	l. This same request was stated (but missed) in the PRTP0's 10/14/2025 comments. Recommend the following edits to the first paragraph of 31.02.425: “The Peninsula Regional Transportation Planning Organization is recommending two measures of level of service, demand and supply, to characterize transit LOS in urban and rural areas. Clallam County shall continue to coordinate with Clallam Transit to support implementation of the agency's long-range system plan, with emphasis on primary routes serving urban areas and regional transportation corridors, consistent with its currently adopted service standards. The following two tables summarize the recommended thresholds and point system used in determining Table 11 (Existing LOS Conditions of Transit Routes).”

m) Concern that the Victoria Express is not a viable UTC. Implies it may not be appropriate under transportation policies.	m. Victoria Express is no longer in service as a passenger ferry (now an eco-tour service under Expeditions Northwest). Recommend elimination of 2nd paragraph, 31.02.415(3).
59) Emailed testimony from John Worthington, dated April 1, 2026. Comments challenged the premise that the Planning Commission does not have purview over project-level decision making, including: a) Authority under the Comprehensive Plan, citing that the Plan establishes policy impacting river restoration and other project-level guidance. Large-scale projects directly impact the outcomes of Comprehensive Plan policy. b) Authority under the Shoreline Master Program. Silar to the Comprehensive Plan, the SMP establishes policy and regulations for activity in shoreline jurisdictions. Comments suggest the Commission reviews shoreline permits. c) Authority under the Critical Areas Ordinance. Comments suggest the Commission is responsible for reviewing projects administered under the CAO d) Authority under SEPA. Comments suggest the Commission serves as Lead Agency for SEPA determinations and project review.	a) The administration of all ordinances affiliated with the Comprehensive Plan is the responsibility of the Department of Community Development (CCC 26.01.040(2)). Although large-scale projects do impact future policy, the Planning Commission's role is limited to recommendations on policy and regulations (CCC 26.01.050(1) & (2)). b) The same organizational structure identified in a) above, also applies here. c) The same organizational structure identified in a) above, also applies here. The limited project review authorities expressed under CCC 26.01.050(3) and (5) were preempted with the adoption of Ch. 26.04, Hearing Examiner (Ord. 580, 1995). d) The Lead Agency responsibility for the county is vested in the Director of DCD (CCC 26.01.040(4) and 27.12.030(8)).

e) Historical and ongoing role in River Management. Comments suggest the Commission has previously reviewed and made recommendations regarding Dungeness River Floodplain projects.	e) The Planning Commission has reviewed and made recommendations concerning watershed planning (WRIA 18 Plan) but has not been involved in the review and recommendations of specific projects involved in the restoration of any river system or similar habitat. This is the responsibility of DCD and other County agencies (CCC 26.01.040 and Section 4.25, Clallam County Charter).
60) Emailed testimony from John Worthington, dated April 1, 2026. Comment indicated a “Jimmycomelately hybrid” could be built on the Dungeness for \$42M. Comments included an estimated cost breakdown, and an estimated price range of \$29 - \$38M.	No policy change is recommended.
61) Emailed testimony from John Worthington, dated April 2, 2026. Comments provided rebuttal testimony to discussion held by the Planning Commission on April 1, 2026. Comments criticized the Lower Elwha Levy project; lack of “professional endorsement” concerning Dungeness policy; allegations that the CPU process is being influenced by North Olympic Development Council (NODC) and the Straits Ecosystem Recovery Network (SERN); and failure to apply the “Jimmycomelately science” to other river restoration projects is a “violation of equal protection.”	No policy change is recommended. To date, the County has not received comments from the NODC or SERN regarding the Comprehensive Plan Update.
62) Emailed testimony from John Worthington, dated April 2, 2026. Comments include:	

a) Express concern that future plans of the Jamestown S’Klallam Tribe and the Lower Elwha Klallam Tribe are not integrated into the CPU process. b) Express concerns about citizen engagement and lack of response to testimony. c) Criticisms of the Lower Elwha Levy project, including placement of log jams d) Concerns that there is a lack of lack of endorsement concerning Dungeness policy;	a) The DCD engaged area tribes in the CPU process as required under RCW 36.70A.040 and .210. Four of five tribes have responded with comments. They are under no mandate to provide comment and their involvement is strictly voluntary. b) The County has generally followed its Public Engagement Plan, as detailed in the Public Engagement Report. Questions are responded to. Suggestions or other comments that do not lend themselves to meaningful policy recommendations are not offered a policy response. c) Not applicable to the CPU. d) The work of the DRMT is not specifically germane to the CPU.
63) Emailed testimony from John Worthington, received April 4, 2026. Included comments from Testimony #56, and includes: rebuttal that the proposal is “too grandiose,” criticisms of the entities focused on recovery of the Dungeness, criticism of log jam construction in the Lower Dungeness Levee project area, criticism of the Dungeness irrigation piping project, advocating for diversion of other stream corridors to supplement water flow in the Dungeness, and criticism of the Dungeness Off-Channel Reservoir project—citing seismic structural risks.	No policy change is recommended.

64) Emailed testimony from John Worthington, dated April 5, 2026. Comments appear to incorporate edited versions of Testimony #59 and #63.	No policy change is recommended.
65) Email from Stephanie Martin, Habitat Division Manager, Makah Indian Tribe, dated April 6, 2026. Comments included reference to habitat and water resource studies that have been conducted in the Hoke Watershed, and recommendations for further study and collaboration, including: “natural restoration to help naturally increase water storage in the watershed and slow drought impacts, and man-made opportunities to capture and store water.”	Recommend including the following sub-regional policy regarding water resources under new subsection 31.05.360(1)(c): <u>“Policy 3. Despite exceptional precipitation, water availability in the Straits Region is limited by geologic formations that prevent the accumulation of ground water in naturally occurring aquifers. Where available, the withdrawal of water for domestic use can impact instream flows needed for restoration and health of fish stocks. More study of the region’s water resources is needed along with additional efforts focused on naturally increasing water storage for resilience against drought impacts, considering man-made structures and other opportunities to capture and store water, and balance domestic and environmental needs.”</u> No policy change is recommended.
66) Article from Hood Canal Environmental Council, dated Spring, 2024, discussing the Pleasant Harbor Master Planned Resort in Jefferson County, submitted by Heather Cantua, received April 7, 2026.	No policy change is recommended.
67) Emailed letter from Judy Larson, received April 8, 2026. Comments included a series of email chains with communications with County staff. Comments included: a) Concern that respondent was unable to provide testimony during the 4/1/26 hearing due to being held in “muted” status.	a) Under the Zoom meeting format, all electronic attendees are held in “mute” until opportunity for public comment. They signify their desire to provide comment by raising their hand icon during opportunity for comment. Those attending by phone can raise their hand by touching “*9” on their keypad.

b) Expressed concerns about proposed zoning changes represented in Zoning Amendment Map Exhibit B. c) Concerns that the SEPA Threshold Determination should have considered testimony regarding impacts related to the irrigation ditch tightening project. d) Concern that record of public and agency comments were not included in the Draft CPU hardcopy documents placed at the Public Library. e) Concerns about consideration of the historic, cultural and hydrologic contributions provided by the open-ditch irrigation network—citing comments submitted by Virginia Shogren (Testimony #57). f) Reference to email correspondences with DCD staff and “questionable responses” relating thereto. g) Requests that Part 6 (Critical Aquifer Recharge Areas) be “added as a Comp Plan element.” New language is also requested: “Activities that can impact quality or quantity	b) The siting of the proposed zoning change from S(R-II) to S(R-III) included analysis of the vicinity. The proposed zoning designation was determined by the Planning Commission to represent a transition from the more intensive commercial and high-density residential areas to the west and south, and the character of residential development within the Palo Verde Loop area (ranges 0.7 to 2.9 acre lots). c) The potential impacts related to the ongoing irrigation system tightening project was fully analyzed in the FEIS for the project in 2003, including the concerns expressed by the commentator. The project is an adopted element of WRIA 18 Watershed Plan (2004). More analysis is provided in the April 6, 2026, Memorandum on this subject. d) All written public and agency testimony is included in the packets to the Planning Commission and are available at the Planning Commission portal at: https://www.clallamcountywa.gov/AgendaCenter. As an ongoing process, it is impracticable to maintain current written testimony with the hard-copy CPU documents at the libraries. e) Please see analysis provided in the April 6, 2026, Memorandum on this subject, as well as the Supplemental Report included in the 5/6/26 Packet. f) Unclear what responses were “questionable.” There was need to provide clarification on certain issues. g) The Standards of Part 6, Critical Areas Ordinance (CAO), is a regulation required to implement the policies of the Comprehensive Plan. It does not serve as a policy document. Section 27.12.615 establishes specific performance standards for land use activities within
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e) Identify future funding capability for transportation improvements needed to accommodate growth. f) Update Zoning standards to address identified barriers to meeting housing needs. g) Transfer policies that establish regulatory standards to the Zoning Code (e.g. temporary shelters on religious properties, agricultural accessory standards). h) Ensure that the use of the CUP process does not preclude the siting of essential public facilities, only conditions them.	e) Staff to provide analysis on this issue by the May 6th meeting. f) Addendum 1 to Appendix C also includes analysis and recommended actions on this issue. Corresponding changes to Zoning standards were provided to the Planning Commission in the 5/6/26 packet. g) Corresponding changes to Zoning standards were provided to the Planning Commission in the 5/6/26 packet. h) Corresponding changes to Zoning standards were provided to the Planning Commission in the 5/6/26 packet.
70) Emailed letter from George Mazur, Washington Department of Transportation, dated April 14, 2026. Comments included: a) Need to provide “analysis of the impacts of planned growth on the state transportation system...” this should include specific actions to bring facilities into compliance with adopted standards. b) Indication that WSDOT will not recognize SEPA Categorical Exemptions under RCW 43.21C.229(3)(b) without requested analysis.	a) Staff has been reviewing the statutory basis for the demand for analysis on impacts to state highway facilities, which appears to be absent. We are working on a response. b) (Same as a, above).

71) Emailed letter from Andy Sallee, Sequim Valley Airport, dated April 14, 2026. The submittal included five letters of support from various County, state and federal agencies expressing support for water service extension to the airport. Comments included: a) Requests amending new language under 31.03.340(8)(d) from "[t]his may..." to "[t]his <u>shall...</u>" b) Requests amendment to 31.03.120, or elsewhere, "that prioritizes and assists the PUD to provide water to Sequim Valley Airport.	a) The use of "may" was deliberate, given that allowing for intensification of uses has to be balanced with GMA requirements prohibiting land use intensities that are not "rural" in nature from occurring outside of UGAs. It is recommended that the current language be retained. b) Recommend amending 31.03.120(3)(a) as follows: "(a) <i>Policy 7</i> Public water systems should be provided within designated urban growth areas, rural centers, rural villages, and rural commercial activity centers. <u>Given the role the Sequim Valley Airport fills for air transportation, and as a vital component of the regional emergency management infrastructure, The PUD should be encouraged to work cooperatively with the Department of Health and the Department of Ecology to facilitate expansion of their water service area to incorporate the Sequim Valley Airport.</u> Public or municipal water systems (i.e., PUD and City of Sequim) should <u>otherwise</u> be limited in rural lands to those areas that can demonstrate water quantity limitations, water quality problems or hydraulic continuity to rivers and streams."
72) Email from John Worthington, dated April 15, 2026. Comments argue that the Planning Commission has authority and obligation to review the proposal for the "Dungeness Hybrid Jimmycomelately Proposal" referenced in the submitted materials.	See response provided for Testimony #59, above. No further policy response is recommended.

73) Email from Maureen McElravy, dated April 15, 2026. Comments included: Concerns over changes in zoning proposed for Bullman Beach, and referencing a development proposal that appears to be of large scale.	There are no land use or zoning changes for the Bullman Beach area, or any area outside of the Clallam Bay/Seki UGA. The Planning Division is unaware of any large-scale commercial, residential, or mixed use development proposal for the Bullman Beach area. No policy response is recommended,
74) Emailed letter from Virginia Shogren, dated April 15, 2026. Comments articulated the historic and cultural significance of the irrigation ditch network in the Sequim-Dungeness Valley, drawing comparisons to early 20 th Century efforts to eliminate the canal systems in Venice Italy. Includes images from the 1978 Sequim Irrigation Festival booklet.	Though received by email on 4/16/26, comments were received based on the Planning Commission's verbal commitment on 4/15/26 to honor submittal or written testimony summarizing oral comments given during the public hearing. No policy response is recommended.
75) Letter from Virginia Shogren, dated April 15, 2026. Comments reiterated oral testimony provided 4/15/26, and included: a) Advocates for a moratorium on further ditch piping to provide certainty, citing no easements, no permits, and lack of notice. b) Need for an updated environmental impact statement. c) Lack of local permitting for the project. d) Lack of funding allocated for future maintenance of the pipeline facilities.	Though received by email on 4/16/26, comments were received based on the Planning Commission's verbal commitment on 4/15/26 to honor submittal or written testimony summarizing oral comments given during the public hearing. Staff has amended its April 6, 2026, Memorandum on this issue. Staff has provided a Supplemental Report on this issue to the Planning Commission, dated April 29, 2026, and included in the 5/6/26 Packet.

e) Moratorium is needed to protect local jurisdictions from legal exposure.	76) Email from Judy Larson, dated April 16, 2026. Comments reiterated oral testimony received 4/15/26, and included: a) Requests an updated EIS/ES, citing the Bureau of Reclamation cancelling a WaterSMART grant for a project on 12/31/25. b) Requests incorporation of comments from 4/8/26 into the Climate Element policies, to include requirement for permitting and SEPA review for future irrigation pipeline projects. c) Requests that policy 31.02.220(1) be expanded to include “rural non-commercial farmers.” d) Requests “the original, first Sequim Prairie Ditch” be added to the list of historic & cultural resources under 31.03.260(8). e) Requests that Part 6 (Critical Aquifer Recharge Areas) be “added as a Comp Plan element.” New language is also requested: “Activities that can impact quality or quantity of exempt wells must complete an environmental assessment described under Section (9) on p.27-82.”
	Though received by email on 4/16/26, comments were received based on the Planning Commission’s verbal commitment on 4/15/26 to honor submittal or written testimony summarizing oral comments given during the public hearing. Responses to these concerns were initially provided in the April 6, 2026, Memorandum to the Planning Commission. Staff has provided a Supplemental Report on this issue to the Planning Commission, dated April 29, 2026, and included in the 5/6/26 Packet.

f) Provided data concerning respondent's private well.	
77) Email from Judy Larson, dated April 16, 2026. Comments included emailed well level data from individual with email address "jsteeby@olypen.com" dated March 8, 2026.	Though received by email on 4/16/26, comments were received based on the Planning Commission's verbal commitment on 4/15/26 to honor submittal or written testimony summarizing oral comments given during the public hearing. No policy response recommended.
78) Email from John Worthington, dated April 20, 2026. Comments contradict direction provided by staff concerning the scope of review afforded the Planning Commission under the County Code.	Though received by email on 4/20/26, comments were received based on the Planning Commission's verbal commitment on 4/15/26 to honor submittal or written testimony summarizing oral comments given during the public hearing. See response to Testimony #59, above.
79) Email from John Worthington, dated April 20, 2026. Comments suggested changes to Bell Creek to provide restoration similar to that provided in Jimmyscomelately Creek, addressed hatchery vs. wild habitat restoration, and provided maps showing the possible locations of improvements. Comments included prior email chains.	Though received by email on 4/20/26, comments were received based on the Planning Commission's verbal commitment on 4/15/26 to honor submittal or written testimony summarizing oral comments given during the public hearing. No policy response is recommended. See responses to Testimony #12, 13, 53 and 59, above.
80) Mailed testimony/materials from Judy Larson, received April 22, 2026. Submittals included excerpts from the FEIS for the Dungeness Agricultural Irrigators Water Conservation Plan (11/26/2003); Map from {Pacific Water Group depicting Modeled Water Level Declines in the Shallow Aquifer (no date); and hand-written water depth data provided by Jim Steeby, 1080 Palo Verde Loop.	Though received by email on 4/22/26, comments were received based on the Planning Commission's verbal commitment on 4/15/26 to honor submittal or written testimony summarizing oral comments given during the public hearing. No policy response is recommended.

81) Series of three emails from John Worthington, dated April 25, 2026. Comments raise concerns regarding Bell Creek impacts from urban runoff creating unnatural flows and supplementing flows in Bell Creek by diverting water from Johnson Creek. Suggests replacing culverts with "clear-span overpasses."	Though received by email on 4/25/26, comments were received based on the Planning Commission's verbal commitment on 4/15/26 to honor submittal or written testimony summarizing oral comments given during the public hearing. No policy response is recommended. See responses to Testimony #12, 13, 53 and 59, above.



RESOLUTION _____, 2026

AFFIRMING COMPLETION OF THE STATE MANDATED PERIODIC REVIEW AND UPDATE UNDER RCW 36.70A.130 THAT CLALLAM COUNTY COMPREHENSIVE PLAN AND DEVELOPMENT REGULATIONS CONTINUE TO COMPLY WITH THE STATE GROWTH MANAGEMENT ACT (GMA).

THE BOARD OF CLALLAM COUNTY COMMISSIONERS finds as follows:

1. Under the Washington State Growth Management Act (GMA), RCW 36.70A, Clallam County is required to develop and maintain a Comprehensive Plan and implementing development regulations that are consistent with the goals and other requirements of the GMA.
2. The Clallam County Comprehensive Plan and Development Regulations are subject to continuing review and evaluation under the GMA. RCW 36.70A.130(1).
3. The GMA provides two mechanisms for updating comprehensive plans and implementing development regulations:
 - a. **Mandatory GMA Periodic Review/Update.** Each county and city subject to fully planning under the GMA is required to periodically take legislative action to review and, if needed, revise their comprehensive plan and development regulations every eight years to ensure that they comply with the GMA, as per the schedule in RCW 36.70A.130.
 - b. **Annual Amendments.** In addition to the required GMA Periodic Review/Update action every eight years, local jurisdictions may consider proposed amendments on a more frequent basis. Under RCW 36.70A.130(2), local jurisdictions may consider amendments to their comprehensive plans no more frequently than once per year, with some exceptions. This is to ensure that proposed amendments are considered "concurrently so that the cumulative effect of the various proposals can be ascertained." Adoption or amendment of development regulations that do not require an amendment of the comprehensive plan are not subject to this once-a-year requirement.
4. The GMA Periodic Review/Update must be accomplished through "legislative action." Legislative action means the adoption of a resolution or ordinance following notice and a public hearing indicating at a minimum, a finding that a review and evaluation has occurred and identifying the revisions made, or that a revision was not needed and the reasons therefore (RCW 36.70A.130(1)).
5. Clallam County took legislative action to complete its last GMA Periodic Review/Update on August 7, 2018 (Resolution 82). With the adoption of Resolution 82, Clallam County affirmed that the County had reviewed and updated its countywide comprehensive plan, regional comprehensive plans, and development regulations to ensure continued compliance with the GMA. This action completed the County's last GMA Periodic Review/Update under RCW 36.70A.130.
6. Under the schedule established in RCW 36.70A.130(4), the deadline for Clallam County to take "legislative action" to comply with the latest, mandated GMA Periodic Review/Update was December 31, 2025. RCW 36.70A.130(7) allows County's additional time where substantial progress is demonstrated towards compliance for development regulations to protect critical areas. Clallam County was delayed in taking final legislative action to complete the GMA Periodic Review/Update by the December 31, 2025, deadline, but is now able to proceed with adoption. In accordance with RCW 36.70A.130(7)(a)(ii), the County has made substantial progress towards updating its protection standards for critical areas and will move to adopt said standards in less than 12 months from adoption of the Comprehensive Plan update.

7. Pursuant to RCW 36.70A.130 and .131, and WAC 365-196-610 (1)(e), the GMA Periodic Review/Update must at a minimum include:
 - a. Consideration of critical area regulations;
 - b. Analysis of urban growth areas to accommodate the urban growth projected to occur in the county based on the most recent 20-year population forecast by the state Office of Financial Management;
 - c. Review of mineral resource lands designations and mineral resource lands development regulation;
 - d. Establishment of a climate change and resiliency element and integration of the same throughout other Plan elements, regional plans and development regulations; and
 - e. Other applicable changes to the GMA since the last review that have not been addressed in the comprehensive plan and development regulations.
8. To assist with the GMA Periodic Update/Review, the County received state grant funding administered by the Washington State Department of Commerce for work completed between July 1, 2024, and June 30, 2025. This state funding supported County review and update efforts, including related public process, in the following primary work areas during the GMA Periodic Update/Review process:
 - a. Review and amendment of County Comprehensive Plan for consistency with updated requirements of the GMA.
 - b. Review and amendment of County development regulations for consistency with updated requirements of the GMA.
 - c. Specific review and update of County Critical Areas Ordinance consistent with updated requirements of the GMA.
 - d. Specific review and update of the Housing Element consistent with updated requirements of the GMA.
 - e. Specific development of a Climate Element and integration in other elements of the Comprehensive Plan.
 - f. Development of Findings and adoption of Resolution that the periodic Comprehensive Plan update is complete.
9. At the conclusion of the prior periodic review/update in August 2018, the County determined that, as amended, the Comprehensive Plan met the goals and requirements of the GMA (RCW 36.70A), as applicable at that time (Resolution 82, 2018).

County GMA Comprehensive Plan and Development Regulations

10. The Clallam County Comprehensive Plan has served as a guide for directing local land use policy and decision-making since adoption of the first plan in 1967.
 - a. In 1995, Clallam County adopted a comprehensive plan (Title 31 CCC) under the GMA planning framework (Ordinances 572, 573, 574, and 583) that included a County-wide Comprehensive Plan (Chapters 31.01 and 31.02 CCC) and four regional plans (see Map below)—Sequim-

Dungeness Regional Plan (Chapter 31.03 CCC), Port Angeles Regional Plan (Chapter 31.04 CCC); Straits Regional Plan Chapter 31.05 CCC), and Western Regional Plan (Chapter 31.06 CCC).

- b. The objective of the County-wide Comprehensive Plan, Chapter 31.02, is to identify goals and policies for those issues that are of a county-wide nature and provide the framework for regional comprehensive plans. Those issues that are of a county-wide nature are: forest and mineral lands, urban growth and sprawl, transportation, economic development, affordable housing, natural, historical and cultural resources, utilities and capital facilities (CCC 31.01.300).
- c. The objectives of the County's regional comprehensive plans are to implement county-wide objectives and address regional/local issues and needs more specifically (CCC 31.01.300).



- 11. The County's adopted Official Comprehensive Plan Land Use and Zoning Map and related countywide and regional comprehensive plan policies and implementing zoning regulations designate urban growth areas (UGAs), natural resource lands, and rural lands as required under the GMA pursuant to RCW 36.70A.070, .110 and .170 as summarized below:

Clallam County General Comprehensive Plan Land Use Designations

GENERAL LAND USE DESIGNATION	ACRES (REV)	% OF COUNTY (REV)
Urban Growth Areas (UGA)	21,724¹	1.94%
Sequim UGA	5,269 ²	0.47%
Port Angeles UGA	9,220 ³	0.83%
Forks UGA	4,944	0.44%
Carlsborg UGA	559	0.05%
Clallam Bay-Sekiu UGA	1,397	0.13%
Joyce	335	0.03%
Natural Resource Lands	640,899⁴	57.44%
Commercial Forest	634,696	56.88%
Agriculture Retention	6,202	0.56%
Rural Land	100,806	9.03%
Rural	92,126	8.26%
Residential LAMIRDs	6,308 ⁵	0.57%
Commercial and Mixed Use LAMIRDs	2,371 ⁶	0.21%
Other Public Lands	4,689⁷	0.42%
Other Lands	347,676⁸	31.16%
Olympic National Park	313,355	28.08%
Tribal Reservation & Trust	34,322	3.08%
COUNTY TOTAL	1,115,794	100%

1- Calculated by adding up each individual UGAs. UGA total equals both incorporated and unincorporated UGA.

2- Includes 53 acres of tidelands.

3- Includes 2405 acres of water area (harbor) and 143 acres of ONP within City boundaries.

4- Commercial Forest Lands are also designated mineral resource land s of long-term commercial significance.

5- Includes Beaver - Lk Pleasant, Bell Hill, Bogachiel Bridge, Bullman, Cedar Glen, Cres, cent Beach, Deer Park - 4 Seasons, Diamond Point, Dungeness Bay - Marine Dr, Dungeness Meadows, East Anderson, East Sequim Bay, Hoko River, East Hoko River, West Kitchen Dick, Lake Farm, Lake Sutherland, Maxfield, NE Carlsborg, Old Beaver, Place Road, Quillayute River, Snider, Solmar – Dryke, Straits, Sunland, The Bluffs, Whitcomb/Dimmel.

6- Bear Creek, Beaver - Lk Pleasant, Blyn, Bogachiel Bridge , Camp Hayden, Clallam River, Deer Park - 4 Seasons, Diamond Point, Dungeness Village, Granny's Café, Indian Creek, Laird's Corner, Laird's Corner East, Lake

Sutherland, Miller Peninsula, O'Brien, Quillayute Airport, Sappho, Sequim Lodge, Silver King, Solmar – Dryke, Straits, Three Rivers, Whiskey Creek, Whitcomb/Dimmel.

- 7- Includes Public and Parks and Recreation zoning.
 - 8- Olympic National Park and Tribal Reservation and Trust Lands are not subject to GMA or County Comprehensive Plan and development regulations.
12. Clallam County GMA development regulations that implement the comprehensive plan include: Consolidated Development Permit Process, Chapter 26.10 CCC; Clallam County Environmental Policy (SEPA Review), Chapter 27.01 CCC; Right to Practice Forestry, Mining and Agriculture, Chapter 27.10 CCC; Critical Areas Code, Chapter 27.12 CCC; Subdivisions, Title 29 CCC; and Zoning, Title 33 CCC. In accordance with RCW 36.70A.020(15) and .480(1), the Clallam County Shoreline Master Program, as adopted under Title 35, CCC, is considered an element of the Comprehensive Plan. Compliance with GMA development regulations is administered through the County's requirements under Title 20 CCC, Code Compliance. Implementation of the County's Comprehensive Plan and GMA goals is also achieved by a variety of other County plans, regulations, interlocal agreements, and non-regulatory programs including, but not limited to:
- a. Building and Construction Code, Title 21 CCC;
 - b. County Board of Health Regulations, Title 41 CCC;
 - c. Open Space Current Use Tax Reduction Program, Chapter 27.08 CCC;
 - d. Clallam County Comprehensive Parks and Recreation Master Plan (2016-2026);
 - e. 2025 Clallam County Hazard Mitigation Plan (Appendix M);
 - f. 2014 Comprehensive Solid Waste Management Plan;
 - g. Junk Vehicle Public Nuisance Code, Chapter 19.60 CCC;
 - h. WRIA 18 and 20 Watershed Plans;
 - i. Community outreach, projects and other efforts benefitting the health of County Coastal areas through the Clallam County Marine Resources Committee (MRC – Puget Sound) and the North Pacific Coast MRC projects;
 - j. Partner on local salmon and ecosystem recovery planning and restoration efforts through the efforts of the North Olympic Peninsula Lead Entity (NOPE), North Pacific Coast Lead Entity (NPCLE), and Strait Ecosystem Recovery Network (Strait ERN); and
 - k. Habitat restoration projects throughout Clallam County.

Growth Allocations and Land Capacity Analysis

13. In accordance with RCW 36.70A.110(2), the County shall designate Urban Growth Areas (UGAs) of adequate size to accommodate future development "based upon the growth management population projection made for the county by the office of financial management." The target growth period to be accommodated is 20 years.
14. RCW 36.70A.070(2) requires the County to accommodate housing for all income segments, including "units for moderate, low, very low, and extremely low-income households." This section of the Act specifically requires the County to include "...an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage growth, as provided by the Department of Commerce."
15. In an effort to assist counties and cities in meeting their obligations for housing allocations, the Department of Commerce developed the Housing for All Planning Tool, or HAPT tool, to assist Counties in allocating housing needs based on anticipated future growth. The HAPT tool is an excel

spreadsheet that includes pre-loaded data for calculating future housing needs based on current housing data within the jurisdiction. Originally, the HAPT model included two methods: HAPT Method A, and HAPT Method B. HAPT Method A allocated housing targets on a pro-rata share of new growth among the jurisdictions. HAPT Method B considered the current status of existing housing stock within each jurisdiction and adjusted the allocation for housing needs accordingly. Both methods failed to consider the limits inherent in the Growth Management Act for allocating low-income housing—typically requiring high-density zoning allowances—in unincorporated UGAs and rural areas.

16. On July 26, 2024, Commerce made available HAPT Method C to all counties in recognition of issues related to the provision of affordable housing in unincorporated urban and rural areas. The HAPT Method C tool exempted rural areas from being required to accommodate very low to extremely low-income housing (0-50% AMI) and required that those needs be accommodated in UGAs and incorporated cities.
17. In considering the input assumptions for the HAPT Method C tool, The Department of Commerce recommended using the medium growth projection model. According to analysis provided by the Department of Community Development, the medium growth projection appeared most in line with growth trends experienced in Clallam County (see Clallam County Demographic Profile, May 2024, Appendix F). Based on these inputs, the HAPT Method C tool projected a County-wide population of 86,700 people by 2045, representing an increase of 7,241 people over the OFM 2025 population estimate (9,545 from 2020 census population figures).
18. Several joint and individual discussions were held between county planning staff and the planning staff from the three incorporated cities between July 12th and August 28, 2024. General consensus was established for supporting the use of the HAPT Method C tool, and for specific growth allocations for the three incorporated cities, the six UGAs within the County, and the remainder non-urban (county) area.
19. On November 26, 2024, the Board of Clallam County Commissioners adopted the growth allocations under the HAPT Method C tool (Resolution 101, 2024), as consented to by the County and three incorporated cities therein. The results of the housing allocation are provided in the following table:

Clallam County Housing Allocations, HAPT C, 8/28/24								
	0-30% AMI						Emergency Housing (temp)	
	Non-PSH	PSH	>30-50%	>50-80%	>80-100%	>100-120%	>120%	
City of Forks	100	45	92	37	13	10	2	27
Forks UGA	10	5	9	4	1	1	0	3
City of Port Angeles	664	299	605	241	85	63	13	173
Port Angeles UGA	100	45	91	37	13	10	2	27
City of Sequim	623	280	568	227	80	61	11	164
Sequim UGA	100	45	91	37	13	10	2	27
Clallam Bay/Seki UGA	10	5	9	4	1	1	0	3
Joyce UGA	0	0	0	0	0	0	0	0
Carlsborg UGA	60	27	55	22	8	6	1	16
Unincorporated Rural	0	0	0	124	44	34	812	0

20. Based on the requirements of RCW 36.70A.110(2) and .070(2), the County prepared a Land Capacity Analysis (LCA, Exhibit B) that determined the suitability of existing lands under the existing land use/zoning array to accommodate projected housing, commercial and industrial growth over the 20-year planning horizon, including the needs of housing within extremely low, very low, low and moderate-income households, emergency housing and emergency shelters. Uniform methodologies were applied, including consideration of vacant parcels, developed parcels with additional capacity, maximum units available under existing zoning densities, and consideration of accessory dwelling units. Concessions were made for the presence of critical areas and application of a reasonable market factor for parcels unlikely to experience development over the 20-year planning horizon.

- a. *Residential capacity.* The analysis for residential unit construction further considered densities needed to meet housing demand based on income bracket. The analysis was completed for the six unincorporated urban growth areas and the non-urban (rural, resource) area of the County. The analysis concluded that an expansion of high-density residential zoning (10 units/acre or greater) would be needed to accommodate a projected 24-unit need within the Clallam Bay/Seki UGA, and a projected 147-unit need within the Sequim UGA. Comprehensive Land Use Map and Zoning Map amendments have been proposed for changing the current URH designation in Clallam Bay/Seki to MD (change from 1 dwelling/12,500 SF to 15 dwellings/acre), and approximately 46.7 acres of currently designated Sequim S(R-II) to S(R-III) (Change from 5 dwellings per acre to 10 dwellings per acre).

Analysis of the 46.7 acres within the Sequim UGA demonstrates that, taking into consideration land precluded by existing development, critical areas and a reasonable market factor, a total of 22.0 net acres would be available for development. At a density of 10 units per acre, that would produce a net capacity of 220 potential residential units, satisfying the shortfall of 147 high-density residential units identified in the LCA (Appendix B). The net capacity of this change will allow for the reasonable attainment of the targeted 147 high-density residential units without significantly increasing densities beyond what is projected over the 20-year planning horizon for the UGA. The LCA and the Clallam County Housing Technical Analysis (Appendix C) both demonstrate that the 10 units-per-acre density threshold is adequate for meeting the County's high-density target needs, including growth needs for low, very low, and extremely low-income households.

Appendix L includes an analysis of the land use and zoning density increase within the Clallam Bay/Seki UGA. Although this change (from 1 dwelling per 12,500 SF to 15 dwellings per acre) could create significant capacity for growth, the analysis clearly details that the expectation for growth within the UGA is very limited—with a 20-year forecast of only 30 total units. Given the population trends of the past two decades demonstrating a slow decline, this projection is optimistic. As demonstrated in Appendices B, C and L, the proposed change will assist the community in meeting its housing targets without risk of over-extending the UGA's urban services and infrastructure in meeting the demands of that growth.

- b. *Emergency housing/emergency shelters.* The adopted HAPT Method C tool included allocations for emergency housing/emergency shelters (Finding 19). The analysis provided in the LCA (Appendix B) demonstrated adequate capacity to accommodate all allocated emergency housing/emergency shelter needs for the 20-year planning horizon except for the unincorporated Sequim UGA. Within the Sequim UGA, a deficit of 27 allocated beds was noted. In evaluating possible alternatives for accommodating this projected need, it was determined that the changes would be substantially disruptive to existing neighborhoods. The County coordinated with the City of Sequim on the matter. According to the City's analysis, substantial capacity existed within the City's commercial core to accommodate the 27-bed allocation applicable to the unincorporated UGA. The Sequim City Council considered this matter during their November 24, 2025, Council Meeting and followed up with a letter of concurrence on December 1, 2025, agreeing to accept the reallocation of the identified 27-bed need within City

limits. The Board of County Commissioners responded on December 9, 2025, adopting Resolution 94, 2025 that officially reallocated the 27-bed emergency housing/emergency shelter need to within city limits.

- c. *Commercial and industrial capacity.* The LCA (Appendix B) included an analysis of existing and potential capacity for existing commercial and industrial-zoned areas to accommodate projected future employment and growth within these categories. The analysis demonstrated that adequate capacity was available under existing land use and zoning designations to accommodate commercial, industrial and related job growth over the 20-year planning horizon. The Findings of the LCA concluded that additional analysis may be needed to evaluate the adequacy of existing development patterns and the ability of available parcels at meeting the County's future economic development needs.
21. *Accessory Dwelling Units (ADUs).* Accessory dwelling units have been allowed in Clallam County since prior to the adoption of the GMA in 1990 as both attached and detached units. In response to changes under the GMA concerning ADU development in UGAs, amendments to Ch. 33.50, CCC, are being proposed that will ensure compliance with the new requirements. These changes will be adopted simultaneous with the Comprehensive Plan Update.
 22. *Adequate Provisions.* RCW 36.70A.0780(2)(d) requires the County to "make adequate [housing] provisions for existing and projected needs of all economic segments of the community..." This includes but is not limited to the following:
 - a. "Incorporating consideration for low, very low, extremely low, and moderate-income households." The housing needs of economic household segments were considered in the analysis of the LCA (Exhibit B), The Housing Element Technical Analysis (Exhibit C), and specifically articulated under CCC 31.02.281(2). This included households with moderate incomes (>80% to 120% of Area Median Income or AMI), Low incomes (>50% to 80% AMI), very low incomes (>30% to 50% AMI), and extremely low incomes (0 to 30% AMI). Specific housing density brackets were assigned to each income category to determine adequacy of existing capacity under current zoning to meet demand over the 20-year planning horizon. Based on this analysis, some changes in zoning density for areas of the unincorporated Sequim UGA and Clallam Bay/Seki UGA have been proposed to accommodate future housing needs of all income segments of the population.
 - b. "Documenting programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations." Several actions have been taken to comply with this section, including adoption of the 2025-2030 Clallam County Homeless Housing Plan (CCC 31.02.280(2)(g)); suspension of the County's TDR program pending improved economic conditions to assure its success (CCC 31.02.283(3)(i)); Expansion of consideration of middle income housing types, such as duplexes, triplexes, townhomes, as well as special accommodations under emergency housing, emergency shelters and permanent supportive housing (CCC 31.02.281(1)), inclusion of zero lot line standards (CCC 31.02.283(3)(b)), Implementation of siting standards for emergency housing and emergency shelters (CCC 31.02.283(3)(i)), and allowing for the installation of temporary housing, safe parking, and other overnight accommodations on land owned by religious organizations (CCC 31.02.283(3)(m)). Additional standards are being proposed under the Clallam County Zoning Code to implement these and similar policies. Analysis of these changes are included under Appendix C and Addendum 1 and Addendum 2, thereto.

- c. "Consideration of disparate impacts, displacement, and exclusion." Pursuant to RCW 36.70A.070(2)(e)&(f), the Growth Management Act requires the County to identify policies and regulations that result in racially disparate impacts, displacement, and exclusion, and implement policies and regulations to address and undo these impacts in housing. The Housing Element Technical Analysis (Appendix C) and Addendum 3 thereto analyzes the racial demographic profile of the County, considers racial distribution across the County, considers family income based on ethnicity, and other factors as recommended by the Department of Commerce to identify and address said impacts in housing. The documents further make recommendations for addressing the issues identified, demonstrating compliance with this requirement.
 - d. "Consideration of housing locations in relation to employment location." This section is specifically addressed under amended policy CCC 31.02.281(1).
 - e. "Consideration of the role of accessory dwelling units in meeting housing needs." Accessory dwelling units have been allowed in Clallam County since prior to the adoption of the GMA in 1990 as both attached and detached units. The role of ADU's in meeting the County's housing allocation targets were fully analyzed within the LCA (Exhibit B). In response to changes under the GMA concerning ADU development in UGAs, amendments to Ch. 33.50, CCC, are being proposed that will ensure compliance with the new requirements. These changes will be adopted simultaneous with the Comprehensive Plan Update.
23. To inform the GMA Periodic Review/Update, the County updated the *Clallam County Demographic Profile – Population, Housing and Economy, May 2024* (Appendix F). The information was updated according to the latest census data as provided by the Office of Financial Management (OFM). The Demographic Profile addresses both countywide and regional population and housing characteristics and changes. The Report informed the development of the LCA and updates to the data contained in the Comprehensive Plan.

Critical Area Regulations

- 24. Chapter 27.12 CCC of the County Code contains the County's critical area regulations. These regulations were originally adopted in June 1992 and have been amended 17 times by ordinance, with the last amendment adopted in June 2025 (Ordinance 1030).
- 25. The County's Critical Area Code, Chapter 27.12 CCC, defines and regulates critical areas consistent with the GMA definitions of critical areas under RCW 36.70A.030 that includes wetlands; areas with a critical recharging effect on aquifers used for potable water; fish and wildlife habitat conservation areas; frequently flooded areas; and geologically hazardous areas.
- 26. Clallam County's critical area regulations considered the state guidelines (WAC 365-190) in the designation and classification of critical areas as required under RCW 36.70A.170.
- 27. The GMA requires the County to include best available science (BAS) in their critical area designations and regulations (RCW 36.70A.172). As part of the GMA Periodic Review/Update process, the consulting staff prepared the Best Available Science Review, Clallam County Critical Areas Ordinance Update (March 18, 2025), and the Gap Analysis, Clallam County Critical Areas Ordinance Update (June 11, 2025). Both documents inform the County as to the specific changes needed in order establish clear compliance with the current regulatory requirements of the GMA. In accordance with RCW 36.70A.130(7)(a)(ii), the analysis indicates the County has made substantial progress towards updating its protection standards for critical areas and will move to adopt said standards in less than 12 months from adoption of the Comprehensive Plan update.

Urban Growth Areas

28. Clallam County has designated six Urban Growth Areas (UGAs)—Carlsborg UGA, Clallam Bay-Sekiu UGA, Forks UGA, Joyce UGA, Port Angeles UGA, and Sequim UGA—that total approximately 21,724 acres (includes incorporated areas), or 1.94% of the County's land base. The largest UGAs are associated with the County's three cities—Forks UGA (~4,944 acres), Port Angeles UGA (~9,220 acres), and Sequim UGA (~5,269 acres). The other three UGAs are associated with the unincorporated communities of Carlsborg (~559 acres), Clallam Bay-Sekiu (~1,397 acres), and Joyce (~335 acres).
29. The Clallam Bay-Sekiu, Forks, Joyce, Port Angeles and Sequim UGAs were all formally designated in 1995 under the County's adopted GMA comprehensive plan. The unincorporated community of Carlsborg was formally designated as the County's sixth UGA in 2000 because of its urban characteristics including an industrial and commercial core, higher residential densities, and urban services and facilities such as public water systems, fire station, school, transit and post office.
30. During the 2007 GMA Periodic Review/Update (Resolution 77), Clallam County completed a 10-year comprehensive review and analysis of its six UGA's in accordance with RCW 36.70A.130(3). The analysis addressed: UGA characteristics; growth trends; projected 20-year population growth for Clallam County and its cities; permitted densities in the cities and unincorporated UGAs; projected UGA population allocations; and analysis of land availability and housing needs. The analysis was coordinated with the cities and the results compiled in a report titled: *Clallam County's Urban Growth Analysis and 10-Year Review, May 2007* (Appendix A).
31. The 2007 UGA Report considered whether the County's six UGAs had sufficient land and densities to accommodate the urban growth that is projected to occur in the county through Year 2030. The county performed the review considering the state OFM's 2002 population projections (Year 2005 to 2025) for Clallam County, which was supplemented to incorporate the OFM's September 2007 population projections for the County through the Year 2030. The analysis showed the County's population growth trending between the OFM's medium and high projections trending to the high population projection.
32. Based on the 2007 UGA Report, the County determined that no revisions to existing UGAs were required to accommodate the projected 20-year growth and that its six UGAs continued to comply with the GMA. The 2007 UGA Report was incorporated by reference under the 2007 comprehensive plan amendment (Ordinance 829, December 11, 2007).
33. The County's six UGAs were challenged following the completion of the 2007 GMA Periodic Review/Update to the GMHB as being oversized. The WWGMHB could not reach agreement on the challenged size of the County's UGAs; and therefore, the County's existing UGA boundaries maintained their presumption of invalidity (April 23, 2008, WWGMHB Final Decision and Order; Case No. 07-0-0018c).
34. Clallam County has determined that the 2007 UGA Report, as supplemented, remains applicable to demonstrate that County UGA's continue to provide sufficient land and permitted densities to accommodate the urban growth and meet housing needs that is projected to occur in the county through Year 2040. This is based on the following:
35. As referenced earlier, the 2025 LCA (Exhibit B) confirmed that the current UGAs are adequate to accommodate the projected growth over the 20-year planning horizon without need for adjusting the boundaries thereto. With minor adjustments to current zoning, the current UGA configuration is sufficient to accommodate all growth projected to occur.
36. Clallam County and its three cities have experienced population growth that has been accommodated by their respective comprehensive plans without any major revisions to UGA boundaries. Since the

2007 GMA Periodic Review/Update, the County has updated its comprehensive plan and development regulations related to the Sequim, Port Angeles and Carlsborg UGAs as summarized below (see Attachment A for more information on referenced Ordinances):

a. Sequim UGA:

- i. Eliminated the Sequim Residential – I comprehensive plan land use and zoning designation that limited urban residential densities to 2 dwelling units (du) per acre and re-designated these areas to Sequim Residential – II that allows for maximum densities of up to 5 du per acre (Ordinance 835, October 2008).
- ii. Expanded the UGA by approximately 105 acres and created a new Research and Development land use and zoning designation (Ordinance 857, December 2009).
- iii. Removed approximately 82 acres from the UGA and designated as rural lands (Ordinance 861, December 2009). The area removed was determined to not significantly impact accommodation of residential growth in the Sequim UGA.

b. Port Angeles UGA:

- i. Amended the comprehensive plan land use and zoning designation of approximately 60 acres from urban residential to industrial (Ordinances 880 and 921).
- ii. Amended the comprehensive plan land use and zoning designation of approximately 6 acres from urban residential to urban neighborhood commercial (Ordinances 932 and 933).

c. Carlsborg UGA:

- i. Constructed a sewer system at an approximate cost of 14.5 million dollars to convey Carlsborg UGA wastewater to the City of Sequim for treatment. The County-financed part of the sewer system was approximately 14.5 million dollars and Carlsborg UGA residents and businesses were able to start connecting in July 2017. Related actions included:
 - Entered into an Interlocal Agreement (November 24, 2014), between the County and the City of Sequim for the treatment of Carlsborg UGA wastewater at the Sequim Wastewater Reclamation Facility.
 - Adopted Resolution 18, 2015 noting the intent to adopt the December 2014 “Carlsborg Wastewater Facilities Plan Amendment” as the sewage general plan for the Carlsborg UGA.
 - Adopted the 2014 Carlsborg Wastewater Facilities Plan as the Carlsborg UGA sewage general plan by reference under the Sequim-Dungeness Regional Comprehensive Plan, Chapter 31.03 CCC (Ordinance 920, November 2016)
 - Adopted new County Code Chapter 13.12, Carlsborg Sewer System related to regulation (e.g., connection requirements) and administration of the sewer system within the Carlsborg UGA (Ordinance 925, March 2017).
- ii. Amended the Comprehensive Plan Land Use and Zoning Map (Ordinance 916, November 2016) affecting over 50% of the UGA as follows:
 - Amended approximately 260-acres of Carlsborg Residential (CR) land use and zoning designations throughout the UGA that allowed for 2 du per acre into three new CR zones that allowed for higher and a variety of residential densities—CR-I (4 to 6 du/ac.), CR-II (4 5 to 8 du/ac.), and CR-III (4 to 10 du/ac.). (Ordinance 916, November 2016)
 - Eliminated the Carlsborg Village Commercial comprehensive plan land use and zoning designation and re-designated the approximately 26 acres impacted into the adjacent Carlsborg Village Center designation. (Ordinance 916, November 2016)
 - Re-designated approximately 12 acres from Carlsborg Residential (CR) to Carlsborg Commercial (CC). (Ordinance 916, November 2016)

- Amended two, small isolated areas associated with the Parkwood Residential Community from commercial to the Carlsborg Residential-II (CR-II) designation for the Parkwood development. (Ordinance 916, November 2016)
- iii. Concurrent and consistent with the land use and zoning map amendments the County also updated the Sequim-Dungeness Regional Comprehensive Plan, Chapter 31.03 CCC, related to the UGA community vision and policies addressing public services and facilities, critical areas, open space, transportation, development standards and land use (Ordinance 920, November 2016).
- iv. Concurrent and consistent with the land use map and comprehensive plan amendments, the County updated the Clallam County Zoning Code zoning and development standards for the Carlsborg UGA (Ordinances 917, 918, and 919; November 2016).
- v. The County's above actions to plan and provide for a Carlsborg Sewer System; update the Carlsborg UGA comprehensive plan future land use map and related policies, and update of implementing zoning controls for the Carlsborg UGA comply with: GMA planning goals to encourage development in urban areas and ensure adequate public facilities and services to support development (RCW 36.70A.020 (1)(2)); capital facility planning for sewer facilities pursuant to RCW 36.70A.070(3); and requirements that UGA's plan for urban growth in areas that have adequate public facility and service capacities to serve such development.

The proposed amendments to the Comprehensive Land Use Map and Zoning Map as referenced in Finding 20, above, will further ensure compliance with the requirements of RCW 36.70A, and ensure the adequacy of the County's UGAs for accommodating future growth through 2045.

Comprehensive Plan Elements

37. Land Use Element. The County's adopted Official Comprehensive Plan Land Use and Zoning Map and related countywide and regional comprehensive plan policies and implementing zoning regulations designate UGAs, natural resource lands, and rural lands as required under the GMA pursuant to RCW 36.70A.070, .110 and .170 (see also Finding 11). Since the 2007 GMA Periodic Review/Update, the County has updated the Comprehensive Plan Land Use and Zoning Map and related comprehensive plan policies and implementing zoning regulations as summarized in Attachment A.
38. Housing Element. The Countywide Comprehensive Plan includes a housing element that addresses housing for all household incomes, including low, very low, extremely low and moderate incomes (CCC 31.02.280 through .283). Consistent with RCW 36.70A.070(2), the County has completed the required analysis of existing and projected housing needs and identifying the number of housing units necessary to manage projected 20-year growth (see Findings 13 through 22).
39. Capital Facilities Element. The Countywide Comprehensive Plan capital facilities element addresses County capital facilities that include County Courthouse (administration), parks and recreation, fairgrounds, sanitary sewer (Clallam Bay, Sekiu, and Carlsborg), solid waste management, detention and corrections, county roads, and equipment maintenance facilities (CCC 31.02.310-.320). A Capital Facilities Plan has also been developed as part of this Comprehensive Plan Update, adopted under Appendix I. The countywide and regional Comprehensive Plans contain additional inventory information and policies for public facilities and services. The cities of Forks, Port Angeles and Sequim have developed capital facilities plans for their respective UGAs as well as the Port of Port Angeles for its Port properties.

The County has adopted a capital facilities plan specific to the Carlsborg UGA. Other supporting County capital facility planning efforts include the six-year Transportation Improvement Program (see Finding 40), parks and recreation master plan, fairground master plan, solid waste management plan,

and annual 10-year capital improvement plan. These provisions guide County investment in developing public facilities and services and maintenance of existing facilities and services.

The County reviews and updates its capital facility needs as needed. The county finds that the comprehensive plan provisions related to capital facilities and supporting planning efforts together with the annual reviews continue to comply with GMA requirements based on local needs. Since the 2007 GMA Periodic Review/Update, significant updates include:

- a. Adoption of the "Carlsborg Wastewater Facilities Plan Amendment" as the sewage general plan for the Carlsborg UGA (2016).
 - b. Annual update of the Six-Year Transportation Improvement Program to address road and multi-modal transportation projects (e.g., trails)—see Finding 40.
 - c. County Park & Recreation Master Plan (2016-2026).
 - d. County Comprehensive Solid Waste Management Plan Update 2021
 - e. Annual update of a 10-Year Capital Facilities Plan to address capital projects and actions identified in the comprehensive plan, various county capital facility plans, and other plans concurrent with adoption of the county's annual budget.
 - f. Clallam County 5 Year Capital Plan, 2024-2028.
 - g. Adoption of the Clallam Bay/Seki General Sewer/Wastewater Facilities Plan (2018 Plan, amended 2025).
40. Utilities Element. The County-wide Comprehensive Plan provides a Utilities Element that identifies the general distribution, location, and extent of the county's public utilities, while analyzing the issues and goals for the same (CCC 31.02.300). Public utility policies and related provisions are also found in the four Regional Comprehensive Plans. Specific utility plans (e.g., electric, water, sewer) are also available from public utility service providers such as the Clallam County PUD #1, the County's three cities, and other larger public water utilities. Clallam County owns and operates a public sewer system utility serving the unincorporated communities of Clallam Bay and Sekiu. Since the 2007 GMA Periodic Review/Update, a major utility improvement by the County in cooperation with the City of Sequim was the construction of a new public sewer collection system serving the Carlsborg UGA that conveys wastewater to Sequim for treatment. Similarly, improvements to the Clallam Bay/Seki Sewer/Wastewater Facility system was completed in 2024.
41. Rural Element. The County's comprehensive plan land use and zoning map related countywide and regional plan policies and implementing zoning designate approximately 100,806 acres, 9% of County, as rural lands. Consistent with RCW 36.70A.070(5), these rural lands provide for a variety of rural densities with allowed maximum residential densities ranging between 1 du per 5 acres to 1 du per 20 acres. In addition, many County rural zones provide for innovative land use management techniques supported by RCW 36.70A.070(5)(b) and RCW 36.70A.090 such as flexible minimum lot size (where consistent with maximum density) to support retention of larger rural lots and density incentives if the property when subdivided meets adopted rural character conservation/cluster design policies and design standards.

County rural lands include formally designated (CCC 31.02.263) limited areas of more intensive rural development (LAMIRDs) consistent with RCW 36.70A.070(5)(d). These LAMIRDs include over 40 areas scattered throughout the County including approximately 6,224 acres (0.56% of County) of Residential LAMIRDs and approximately 2,364 acres (0.21% of County) of Commercial and Mixed Use LAMIRDs. Residential LAMIRDs include seven land use and zoning designations that allow for densities ranging from 1 du per 12,500 sf to 1 du per 2.4 acres, with approximately 70% of Residential LAMIRDs allowing a maximum residential density of 1 du per acre. County Commercial

and Mixed Use LAMIRDs are typically associated with isolated or cross-road commercial nodes along state highways, existing small communities, rural airports, and other locations.

The GMA provides that “because circumstances vary from county to county, in establishing patterns of rural densities and uses, a county may consider local circumstances, but shall develop a written record explaining how the rural element harmonizes the planning goals in RCW 36.70A.020 and meets the requirements of this chapter (RCW 36.70A.070(5)).” Clallam County previously developed a written record that shows how local circumstances guided the development of the rural element of the comprehensive plan consistent with the GMA as noted in the following two reports entitled: *Clallam County Rural Lands Report, December 2006*, as supplemented (Appendix D) and the *Clallam County LAMIRD Report, September 2006*, as supplemented (Appendix E).

Upon review of the County’s rural areas through the LCA (Exhibit B), it was determined that no additional changes were needed to the Land Use Designation and Zoning Map for this portion of the County under this Comprehensive Plan Update.

42. Transportation Element. The countywide comprehensive plan inventories, describes, and analyzes county transportation, including multimodal, needs and resources (CCC 31.02.410-444). The transportation element inventories roads; ports, terminals, and moorage; ferries; airport resources; recreational, pedestrian, and bicycle trails; and public transit resources and includes goals and policies for multi-modal transportation facilities (CCC 31.02.415). The Plan analyzes level of service (LOS) standards, which are used to measure whether transportation facilities are performing at acceptable levels and to identify capacity deficiencies (CCC 31.02.410-432), including adopting a policy that highway level of service (LOS) be consistent with the Peninsula Regional Transportation Planning Organization (PRTPO) regional plan. The county’s four regional comprehensive plans, including neighborhood plans within the Port Angeles and Sequim planning regions, provide additional inventory, goals, and policies for transportation. The County also maintains an up-to-date inventory of County roads which includes functional class and road characteristics (e.g., width), and a pavement management system that involves videotaping of County roads.
43. Six Year Transportation Improvement Plan. Consistent with RCW 36.70A.070(6)(iv), the County annually reviews and updates a six-year Transportation Improvement Plan (TIP). Consistent with the comprehensive plan and 6-year TIP, a number of major transportation improvement projects have been implemented since the 2018 GMA Periodic Review/Update to improve LOS, road/bridge safety, and multi-modal transportation including, but not limited to:
 - a. Major collector/arterial road improvement projects:
 - i. Sequim-Dungeness Way and Woodcock Road Intersection Improvement Project. Constructed a roundabout.
 - ii. Dry Creek Road Improvement Project (~ 0.7 miles). Reconstruction, widening, and resurfacing. Project also added a left turn lane at US 101 intersection and moved intersection with Edgewood Drive to west to accommodate future left turn land from Edgewood Drive onto Dry Creek Road.
 - iii. Laird Road Improvement Project (~ 0.5 miles). Resurface, restore, and shoulder widening.
 - iv. Carlsborg Road Improvement Project. Resurface, restore, and shoulder widening (Mile Post 1.01 to 1.76) between Olympic Discovery Trail crossing and Old Olympic Highway.
 - v. South Airport Road Improvement Project (~ 0.7 miles). Resurfacing of key connecting road between US 101 to William Fairchild International Airport.
 - vi. Old Olympic Highway Improvement Project (~ 0.85 miles). Resurfacing, widening, and stormwater improvements (Milepost 2.75 to 3.6).
 - b. Major local access road completed improvement projects:

- i. Town Road Relocation and Improvement project. Relocated North Segment of Towne Road to top of relocated levee, including construction of separated (by curb) bike and pedestrian path along the road.
 - c. Major culvert/fish passage improvement projects:
 - i. Hoko-Ozette Road culvert replacement. Replaced structurally failed culvert and fish passage barrier at milepost 8.8 – Johnson Creek crossing.
 - ii. Kugal Creek culvert replacement on Cooper Ranch Road. Fish passage improvement project.
 - iii. Bear Creek Road culvert replacement. Fish passage improvement project.
 - iv. Crescent Beach Road culvert replacement. Replaced storm damaged culvert that failed.
 - v. Wilson Creek culvert replacements. Replaced culverts on Wilson Creek for fish passage improvement along Wisen Creek and Swede Roads.
 - d. Major bridge improvement projects:
 - i. Old Olympic Highway, McDonald Creek Bridge replacement.
 - ii. Woodcock Road, Dungeness River Ward Bridge scour repair project.
 - e. Olympic Discovery Trail (ODT) major improvement projects:
 - i. ODT-Freshwater Bay Road to Thompson Road, via Onella/historic railroad grade alignment (~ 1.75 miles).
 - ii. ODT-Gossett Road to Waterline Road connector (~ 1.6 miles).
 - iii. ODT-Spruce Railroad Trail Final Phase, North Shore Lake Crescent. Completed the remaining gap of the ODT around the north shore of Lk. Crescent to provide a safe, 10-mile long, ADA accessible, trail alternative for non-motorized users that completely bypasses the busy US 101 route around Lake Crescent. Key final phase improvements included: (a) restore Daley-Rankin Tunnel; (b) restore and pave approximately four miles of shared use trail.
 - iv. ODT-Diamond Point to Gardiner Road connector. Constructed the last ~600 feet trail segment from Diamond Point Rd. to East County Line and extending to Old Gardner Road in Jefferson County.
- 44. Economic Development Element. Under the GMA, the economic development element is mandated where funds sufficient to cover applicable local government costs are appropriated and distributed by the state at least two years before the jurisdiction must complete the periodic review/update (RCW 36.70A.070(9)). The Legislature has not specifically allocated funds to cover County costs for the County's economic development element. Nonetheless, the County's comprehensive plan contains an economic development element under CCC 31.02.610 and .620 of the Countywide Comprehensive Plan. Additional economic development element provisions are found within the county's four regional comprehensive plans. Data has been updated to reflect current trends and additional policies have been included under CCC 31.02.620 to reflect current opportunities and challenges.
- 45. Parks and Recreation Element. Under the GMA, the parks and recreation element is mandated where funds sufficient to cover applicable local government costs are appropriated and distributed by the state at least two years before the jurisdiction must complete the periodic review/update (RCW 36.70A.070(10)). The Legislature has not specifically allocated funds to cover County costs for the County's park and recreation element. Nonetheless, the County has adopted and a 10-year Clallam County Comprehensive Park and Recreation Master Plan (2016-2026) and is currently working on an update to the Plan. In 2009, the County amended the comprehensive plan land use and zoning map creating a County Parks and Recreation (PR) designation and related zoning standards (Ordinance 860), and in 2015 the County expanded the PR designation associated with new 40-acre regional park (Rainshadow Disc Golf Park) on the Miller Peninsula. No additional changes are proposed under this Comprehensive Plan Update.

46. Natural Resource Lands. Clallam County has designated natural resource lands totaling approximately 641,000 acres, or 57.6% of the County's land base, to assure the conservation of forest, agricultural, and mineral resource lands of long-term significance consistent with RCW 36.70A.060 and .170.

- a. Commercial Forest Lands. Nearly 641,000 acres (~57 % of County) is designated as commercial forest lands. Forestry is also an allowed and preferred use in County designated rural lands. At the time of the county's initial natural resource lands designation in the early-1990's under the GMA, the county found that conversions from forest use to residential and other uses were negatively affecting the amount of land available for productive commercial forest use (CCC 31.02.130). The county went through an extensive study and evaluation that resulted in the enactment of policies for designation and protection of commercial forestlands (CCC 31.02.140). To implement its policies for designation and protection of commercial forest lands, the county enacted regulatory changes. For instance, most designated commercial forest lands were downzoned from the pre-existing zoning (which allowed densities ranging from one unit per 5 acres to one unit per 20 acres,) to new zoning that restricts residential development to one unit per 80 acres for most designated commercial forest lands.

In 2016, there were only an estimated 105 homes scattered throughout the County's over 630,000 acres of designated commercial forest lands, and only another 56 homes in the over 4,000 acres of commercial forest-mixed residential designations. Since the 2007 GMA Periodic Review/Update, there has been no loss of designated commercial forest lands, and approximately 160-acres of rural lands were re-designated to commercial forest lands. The commercial forest industry continues to face challenges of economic conditions and environmental regulations, but the pressures previously presented by conversions to conflicting uses have been effectively curtailed.

- b. Agricultural Lands. Approximately 6,202 acres (~0.6 % of County) is designated as agricultural retention lands. Agriculture is also an allowed and preferred use in County designated rural lands. The designation and regulation of agricultural lands of long-term commercial significance in Clallam County have been thoroughly vetted associated with two prior WWGMHB cases. In the 1990's, regulations applicable to the designated agricultural lands were challenged and found to be noncompliant. The County undertook a thorough review and evaluation of the unique local circumstances applicable to these lands and designed regulations to appropriately conserve and protect the designated agricultural lands, consistent with local circumstances and the goals and requirements of the GMA (Ordinance 627, October 1997). Upon review of the county's compliance, the WWGMHB not only found compliance and lifted invalidity, but congratulated the county for "a job well done" (WWGMHB 96-2-0031, Rescission of Invalidity and Finding of Compliance, 11 (Dec. 11, 1997)).
- c. Mineral Resource Lands. At the adoption of the last Comprehensive Plan Update in August 2018, the County had identified over 634,00 acres of mineral resource lands, which primarily coincided with the County's designation of Commercial Forest Resource Lands (CF) as well as existing mining locations. A challenge of the Comprehensive Plan update was filed with the WWGMHB, taking issue with the lack of full compliance with the mineral lands' designation criteria of RCW 36.70A.131, citing that the County had over-designated all Commercial Forest Resource Lands as Mineral Resource Lands. On November 10, 2020, the Board of County Commissioners adopted Ordinances 967, 968 and 969 establishing a formalized method for classification of mineral resource lands that uses a scoring method and awards points for the presence of key resource features. 39 existing mining sites were automatically included in the Mineral Resource Land Overlay District (MRLD), along with ten inactive sites based upon the designation criteria. Upon adoption of the ordinances, the petition before the WWGMHB was withdrawn. With no additional mineral resource inventory mapping or other information affecting the original data considered, no further changes to the mineral resource lands policies or the regulations included

under Chapters 27.10 or 33.62 are warranted. This review demonstrates that the County is presently compliant with the mineral resource lands designation criteria of RCW 36.70A.131 and .170.

- d. Natural Resource Land Notices. Clallam County has adopted development regulations consistent with the GMA requirements under RCW 36.70A.060(1) for notices and disclosure for development within 600 feet of natural resource land designations pursuant to its Right to Practice Forestry, Mining, and Agriculture code, Chapter 27.10 CCC, and Subdivision Code (Chapter 29.20.300(26)). To address recent changes under RCW 36.70A.060(1)(b), new notice requirements will apply to all new building and development permits occurring within 500 feet of designated agriculture, commercial forest or mineral resource areas designating those uses as priority uses, and limiting the County's consideration of possible nuisances if said operations are following best management practices (proposed CCC 33.40.110).
47. Climate and Resiliency Element. On July 23, 2023, the State Legislature adopted as law House Bill 1181, which amended, among other sections, RCW 36.70A.020(14) and .070(9), requiring the County to adopt a climate change and resiliency element to its Comprehensive Plan and development regulations. In association with a grant provided by the Department of Commerce, the County hired Cascadia Consulting to assist in the development of the newly required element. Following an extensive process involving an appointed focus group, public outreach meetings and coordination with County staff, the consulting team provided draft recommendations for a climate and resiliency element that has been incorporated under CCC 31.02.810 and .820 of the draft Comprehensive Plan Update. Key portions of the recommended element have also been integrated into other elements of the Plan and regional subarea plans.
 - a. To address specific requirements of RCW 36.70A.070(1), CCC 31.02.820(8)(f) and .820(13)(c) formally adopt the 2025 Clallam County Hazard Mitigation Plan and Chapter 6 of the 2021 Washington State Wildland-Urban Interface Code, respectively. These plans and regulations set forth standards and procedures for addressing public safety concerning the projected proliferation of wildfire and associated risks within Clallam County.
 48. Clallam County and its three cities are collaborating on updates to the Countywide Planning Policies adopted previously under RCW 36.70A.210. The City of Port Angeles adopted its Comprehensive Plan Update on December 26, 2025. It is anticipated that the remaining updates will be completed and adopted by the county and its cities in 2026.
 49. The Clallam County Planning Commission held a duly advertised public hearing on the proposed amendments to the Comprehensive Plan and development regulations on November 5, 2025. The public hearing was continued on five separate occasions, concluding on February 18, 2026, following which, the Planning Commission forwarded their recommendation to the Board of County Commissioners citing 49 findings in support of their recommendation.
 50. Board of Clallam County Commissioners held a public hearing on April 7, 2026, and continued the hearing to April 21, 2026. Following the close of the public hearing, the Board took unanimous action to approve the changes under the Comprehensive Plan Update based on Findings 1 through 50 within this Resolution.

NOW, THEREFORE, BE IT RESOLVED by the Board of Clallam County Commissioners, in consideration of the above findings of fact:

1. The County has completed its periodic review and update as required under RCW 36.70A.130.

2. The County's comprehensive Plan and implementing development regulations as amended (see Attachment A) from the previous 2018 GMA Periodic Review/Update meets the goals and requirements of the GMA (RCW 36.70A).
3. The County's periodic review considered many prior County actions, particularly since the last GMA Periodic Review/Update completed in August 2018 (Resolution 82) and August 2007 (Resolution 77), to review and revise its Comprehensive Plan and development regulations, which actions reflect changing local needs and GMA compliance measures. By recognizing prior enactments for which notice of action has already been published, this Resolution in no way incorporates or re-enacts such measures, and they remain outside of the notice of action and appeal period applicable to this Resolution. This Resolution collectively summarizes the compliance status of the County's comprehensive plan and development regulations in recognition of regular annual and periodic amendments and the County's update activities in response to the update provisions of RCW 36.70A.130.
4. The County will continue to review and update its comprehensive plan and implementing development regulations to be responsive to local needs and growth issues consistent with the GMA.

PASSED AND ADOPTED this _____ day of _____, 2026

BOARD OF CLALLAM COUNTY COMMISSIONERS

Mark Ozias

ATTEST:

Randy Johnson

Loni Gores, Clerk of the Board

Mike French, Chair



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: May 8, 2026

To: Public

From: Bruce Emery, Director of Community Development

Re: Addendum 1, Housing Element Technical Analysis (Appendix C), Response to Barriers to Housing Availability

In accordance with RCW 36.70A.070(2)(ii), the Growth Management Act (GMA) requires Clallam County to document “programs and actions needed to achieve housing availability including gaps in local funding, barriers such as development regulations, and other limitations.” The Housing Element Technical Analysis (Appendix C) identified several potential barriers to affordable housing, and prescribed actions that could be considered in response under Section 6.3. To meet the County’s obligation articulated under the GMA, the following provides a summary of how the County has responded to the barriers identified in Appendix C.

Barrier	Actions proposed to address barrier	Actions implemented concurrent with the CPU
Low maximum densities or low maximum FAR	- Exploring alternatives to TDR program and encoding higher density standards into base zoning. - Since URH is considered to be a zone that allows multi-family dwellings, the County should consider development regulation changes that allow higher maximum density in zones for multi-family dwellings.	- Changes made to temporarily suspend TDR and expand usable density in S(R-II), S(R-III) and S(R-IV) zones. See CCC 33.07.010(10), 33.13.030(9), 33.13.050(7), 33.13.070, 33.19.030, and 33.19.050(2)(A) & (3). - See proposed Generalize Zoning and Land Use Map change (Exhibit A) for area to be changed from URH to MD. - Increased densities as bonus for multi-family developments (see 33.13.010, 33.13.030, and 33.13.040).
Large setback requirements	County should consider reduced front setbacks for zones that allow multi-family dwellings.	Definition of “Setback” (CCC 33.03.010(97)) includes: “the distance...between a lot line or the center line of a street right-of-way and the foundation of a building...” Although some zones show a front yard setback of “45-feet,” this

		accounts for a presumed 30-feet of a standard 60-foot right-of-way. The functional setback from the property line is 15 feet, consistent with or less than city jurisdictions.
Environmental Constraints	County is proposing redesignation of all area currently zoned URH in Clallam Bay/Seki to MD, increasing capacity on the 208.3 acres of developable land not encumbered by critical areas. This will create plentiful capacity at much higher potential densities (and therefore lower income brackets) in a UGA with a shortage of low-rise multifamily capacity.	See proposed Generalize Zoning and Land Use Map change (Exhibit A) for area to be changed from URH to MD.
Arbitrary limits on number of occupants (in conflict with RCW 35A.21.314)	County is working on code changes as part of this plan update that includes a more expansive definition of household and corrects references in other definitions as appropriate.	Specific edits can be found under CCC 33.03.010(49) "Household," (86) "Permanent supportive housing," (106) "Single-family dwelling," and (118) "Transitional housing." Also, elimination of "Group homes" as treated differently than other residential developments (CCC 33.19.040(A) and CCC 33.20.040(A)).
Gaps in local funding	No additional funding streams anticipated.	Addendum 2 to the Housing Element Technical Analysis (Exhibit C) concluded an annual shortfall of identified local public funding of \$8,918,694 annually for funding subsidized housing needs in Clallam County. The State's Housing Trust Fund is identified as a primary source for obtaining grant funding for meeting subsidized housing needs. Other sources are periodically available and should be sought to meet this financial need.
Must allow two ADUs on each lot in UGAs; May not require owner	County is working on code changes that adopt updated	Changes have been made to Chapter 33.50 applicable to ADUs consistent with RCW 36.70A.681.

to occupy the property, and may not prohibit sale as independent unit, but may restrict the use of ADUs as short term rentals; Must allow an ADU of at least 1,000 SF; Must set parking requirements based on distance from transit and lot size; may not charge more than 50% of the impact fees charged for principal unit; must permit ADUs in structures detached from principal unit; may not restrict roof heights to less than 24 feet, unless that limitation applies to the principal unit; May not impose setback requirements, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review for ADUs that are more restrictive than those for principal units; must allow detached ADUs to be sited at a lot line if the lot abuts a public alley, unless the city or county routinely plows snow on the public alley; must allow conversions from existing structures, even if they violate current code requirements for setbacks or lot coverage; and may not require public street improvements as a	ADU requirements in tandem with the periodic update.	There are no functional alleyways in unincorporated Clallam County that would trigger requirements under RCW 36.70A.681(1)(i). Clallam County already allows the conversion of existing structures through the building permit process to convert existing structures into habitable dwellings, including ADUs. Lawfully established, nonconforming setbacks do not limit this ability.
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condition of permitting ADUs.		
Unclear development regulations	Unclear how “satellite bedroom” applies to ADUs. County is working on code changes that adopt updated ADU requirements in tandem with the periodic update.	A new Section CCC 33.50.060, “Satellite bedrooms,” has been added to provide clarity and reasonable conditions on the inclusion of satellite bedrooms as part of single-family development, including development parameters.
Off-street parking requirements	County is working on code changes that adopt updated ADU requirements in tandem with the periodic update.	ADU standards proposed to be amended in accordance with 36.70A.681. Changes amending 33.19.060(4)(a) & (c) and 33.20.060(4)(a) & (c) to reduce parking space from 1.5 to one per unit for five-unit and greater developments, and eliminating parking area landscaping requirement except for 5 units and greater.
Other issues identified: High or no maximum lot sizes.	Reduces land use efficiency and fails to encourage multi-family housing, which is needed to address needs in all income segments.	Established or increased maximum lot sizes in 33.13.040(6), 33.13.060(6). Also incentivized multi-unit housing by allowing expansion of maximum lot size and density over certain unit thresholds (see 33.13.010(4)&(5), 33.13.030(4), 33.13.040(4))
Other issues identified: Zero Lot Line	Allows for conservation of developable space and cost savings through reduced costs per square foot of construction.	Allowance of zero lot line setbacks (common wall/roof) (see 33.13.010(7)(b), 33.13.030(8)(b), 33.13.040(7)(b), 33.13.050(6)(b), 33.13.060(6)(b), 33.16.050(2)(A), 33.20.050(2)(A)).

Other Barriers. The analysis performed under the Housing Element Technical Analysis (Appendix C) focused on policies and regulations contained in the County Code as well as local economic circumstances. However, there exists multiple circumstances that exist as a result of state and federal regulations and requirements that contribute substantially to the County’s ability, or inability, to meet its housing needs. While there are additional barriers, the following includes some of the more significant barriers restricting the County’s ability to provide housing affordable to all segments of the population:

- *Imbalances in tenant and landlord rights.* The adoption of changes in RCW 59.18.650 (2021) establish significantly increased timelines and required showings for the

processing of evictions by a landlord for the removal of tenant. While new legislation was adopted in part to address the difficulties many renters were experiencing during the COVID 19 Pandemic with maintaining employment and meeting rent obligations, the continuation of these requirements has had a significant impact on the availability of private-sector rental stock. Specifically, landlords have found it frustratingly difficult to evict a renter, and given the time involved, many have encountered substantial damage to their rental structures out of retribution for the eviction.

As a result, many would-be landlords have converted their property to short-term rentals or have simply stopped renting their property and have kept them vacant. In 2004, the City of Port Angeles conducted an analysis to determine the extent of short-term rentals within City limits and their impact on housing availability. While over 200 STRs were discovered, an even grater rate of four to one vacant homes to STRs were realized. In considering the role of STRs in impacting rental housing availability, the data determined by the city suggests that home vacancies is a far greater problem, with the result being far fewer rental units available for housing.

- *Energy Code Requirements.* The State Energy Code adopted pursuant to WAC 51-11C, establishes requirements concerning energy efficiency of new construction. The regulation has been updated every three years since 2012, under direction of the State Legislature, with the intent of achieving zero net loss by 2030. However, in the efforts to meet full energy efficiency, significant costs have been introduced as part of the requirements to new construction. As noted in their Report, Economic Development in Clallam County (2023), the Clallam County Economic Development council noted that housing construction costs have "...increased by an average of \$114,000 due to the Washington State Building Code Council energy mandate changes."

While energy efficiency is a worthwhile and legitimate pursuit under the Building Code, the accelerated costs imposed under the regulation has to be carefully considered as a significant barrier to affordable housing. The Department of Commerce estimates that current development costs for new housing at \$359,266 per unit in Clallam County. This means the energy efficiency component represents 32% of the development costs. State another way, if home development was still operating under the 2012 Code, the cost per unit would be \$245,266, placing new home construction within reach of moderate-income households.

- *Prevailing wage requirement.* The use of state or federal funds available for the construction of housing must be compliant with requirements for *prevailing wage* as established under RCW 39.12. Prevailing wage is calculated by the Department of Labor and Industries (L&I). The procedures adopted by L&I require the prevailing wage to be determined based on an average of wage data provided by union supported labor within the largest city within the county jurisdiction. In Clallam County, this involves projects that occur within the City of Port Angeles.

With the absence of local union-supported employment, the data provided to L&I is typically from labor sources outside of the County (typically from I-5 corridor jurisdictions). The result is wage data that is artificially elevated due to home economic conditions of the responding business and added costs for out-of-area wages. The result is that Clallam County suffers from higher prevailing wage levels than King County. This means that costs associated with grant-funded projects from local NGAs is

going to be much higher in Clallam County than other areas of the state, meaning less local benefit for each dollar spent. It further means that local companies are outcompeted due to their inability to meet prevailing wage criteria. The result is less housing projects and more barriers for Clallam County and its cities.

- *Water Resources.* With the onset of the impacts of climate change, water resources have become front and center as a consideration for meeting future residential demand. Within the eastern portion of the WRIA 18 Watershed, the state adopted the Dungeness Water Rule under WAC 173-518. The regulation established the Dungeness Water Exchange, which requires a mitigation certificate and metered water intake, not to exceed 150 gallons per day, for new residences. The exchange, established in 2013, created an allocated reserve of 174,000 acre feet of water for new exempt well domestic uses. To date, over 34% of the original allocation has been used.

As part of the rules established for the exchange, the Department of Ecology also determined that new commercial uses would not be issued a water mitigation certificate for new commercial uses. The requirements of the exchange and the limits to new exempt-well domestic uses will require the County to plan for and determine alternatives once the domestic reserve has been used. It should also be noted that the limits for water allocation does have an impact on economic development as new home enterprises and home-based industries in the Sequim-Dungeness Valley are restricted from receiving water mitigation certificates and approval to use exempt wells.

Clallam County should work collaboratively with state and federal agencies to address these barriers. Documented experiences at the local level should be articulated to lawmakers so the unintended consequences of otherwise well-intended regulations and programs can be fully understood and needed adjustments made to address impacts. In the broader context of housing affordability and availability, these efforts will far outweigh changes in zoning or other local regulations in meeting future housing demand.

The changes cited herein will help address identified barriers to affordable housing and meet the County's obligation articulated under RCW 36.70A.070(2)(ii). If you have any questions, please feel free to contact me at 360-417-2323 or by email at bruce.emery@clallamcountywa.gov.

Sincerely,



Bruce Emery, Director
Clallam County DCD

Recommend amending 31.02.420(1)(d)(iv), as follows:

(iv) ~~A computer transportation model to forecast future road deficiencies and a transportation inventory data base will be maintained for the County and municipal jurisdictions to monitor growth and forecast predictions and also become the basis for a concurrency management system. (See CCC 31.02.425 for discussion of forecasting methodology.)~~Seek assistance from the Peninsula Regional Transportation Planning Organization to monitor the level of service and analyze impacts on level of service from any planned growth on the following segments and intersections identified by WSDOT as a planning priority for highways of statewide significance:

- Blyn: US-101 and Sophus Road
- Carlsborg: US-101 and Taylor Cutoff Road
- US-101 and Old Olympic Highway, and
- Port Angeles: US-101 and SR-112 immediately west of Port Angeles.

The County will consult with WSDOT concerning WSDOT's setting of level of service standards for Highway 101, a highway of statewide significance.