

AGENDA

Clallam County Planning Commission

Planning Commission Meeting of Wednesday, January 21, 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:** January 7, 2026 minutes
- F. ANNOUNCEMENTS:** RV Ordinance update
- G. PUBLIC COMMENT on AGENDA ITEMS** – Please Limit Comments to Three Minutes
- H. UNFINISHED BUSINESS:** None
- I. PUBLIC HEARING/COMMISSION ACTION:** Continued Public Hearing of the Comprehensive Plan Update
- J. WORK SESSION ITEMS:** Continued work on the changes to the Comprehensive Plan Update
- K. PUBLIC COMMENT** – Please Limit Comments to Three Minutes
- L. DISCUSSION OF PUBLIC COMMENTS**
- M. GOOD OF THE ORDER**
- N. ADJOURNMENT**

Members:

Chair, Steve Gale & Vice-Chair, Katina Hester
Warren Billups; Thomas Butler;
Jane Hielman; Ron Long; Kenneth Reandeu; Janice Wilson; Vacancy

Department of Community Development Staff:
Donella Clark, Principal Planner; Bruce Emery, DCD Director

MINUTES

Clallam County Planning Commission

Meeting of January 7, 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 Ron Long, Ken Reandeau, Katina Hester, Tom Butler, Bonnie Booth, Warren Billups, Jane Hielman, 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 Gale and Long requested changes to the minutes. Commissioner Reandeau motioned to approve the minutes with the stated corrections and Commissioner Butler seconded. Motion passed with one abstention.
- F. **ANNOUNCEMENTS:** Introduction of newest District 3 member Janice Wilson. Announcement of vacancy in District 1 with Bonnie Booth's resignation. Appointment of Steve Gale as Chair and Katina Hester as Vice Chair.
- G. **PUBLIC COMMENT PERIOD:** John Worthington asked where the Cascadia Consulting Group, Puget Sound Partnership, and Straight ERN (SERN) comments on the Comprehensive Plan could be found. Wants to see their suggestions.
- Director Emery noted later in the meeting that there is no recorded testimony from any of these groups. Cascadia Consulting Group was the contractor hired to assist with the Hazard Mitigation Plan and we do not expect comments from them.
- H. **UNFINISHED BUSINESS:** None.
- I. **PUBLIC HEARING ITEM:** Director Emery noted a concerned citizen requested additional time to comment since they were experiencing computer issues and could not attend in person and suggested the public comment period and hearing be continued to January 21, 2026. Staff is still waiting for information from the subconsultant. Letter of testimony from the Hoh Indian Tribe was received and distributed, along with an aerial photograph of the Sequim Valley Airport.
- John Worthington commented that the Comprehensive Plan needs to be more detailed exactly how growth is being diverted to the Urban Growth Areas and asked what that means for farming and restoration.
- J. **WORK SESSION ITEMS:** Director Emery clarified that the Growth Management Act encourages growth into Urban Areas in order to connect to services and reduce sprawl, but that it does not specify that all development must be diverted to UGA's. Rural development is still anticipated and must be planned for.
- Discussion over Table 2 and responses to the Planning Commission's comments regarding essential public facilities were address, and the proposed language was deemed acceptable. Language gives latitude to create standards for the siting of such facilities along with the continued use of the Conditional Use Permitting process. Commission then went on to review Table 3 which includes public comments. Ambiguous language regarding artifacts was discussed with suggestions to meet the objectives. The group agreed to reject the proposed language regarding the climate requirements. The new climate element is already included and is likely all that the County will be able to achieve at this time. County will continue to work with the Tribes.

Conversation regarding the request by the Sequim Valley Airport was had. Zone 3 is approximately 23 acres. If we change the allowances to include all commercial activities with no standards we could unintentionally end up with an urban center. Providing some flexibility to allow some commercial activities with limitations could allow the airport some economic success to help maintain operations of the airport, but will also maintain the rural character that is intended.

Commissioner Long made a motion to continue the public hearing with Commissioner Booth seconding. Motion passed.

- K. PUBLIC COMMENT PERIOD: John Worthington commented that the natural systems of the Dungeness and Elwha are dismal and the Jimmymelately Science should be used to provide space and tributaries for better salmon habitat.
- L. DISCUSSION OF PUBLIC COMMENTS: None.
- M. GOOD OF THE ORDER: Thank you to Bonnie for her years of service.
- N. ADJOURNMENT: The meeting adjourned at __8:05 p.m.____



HOH INDIAN TRIBE

P.O. Box 2196, Forks, WA 98331
(360) 374-6582 · hohtribe-nsn.org

Darlene Hollum CHAIRWOMAN
Maria Lopez VICE CHAIRWOMAN
Tahnee Hudson SECRETARY
Josephine Ward TREASURER
Rosetta Leitka MEMBER
Walter Ward-Bos V MEMBER
Cynthia Sheriff MEMBER

January 5, 2026

Hoh Tribe

P.O. Box 2196
Forks, Washington 98331

Clallam County Community Development

223 E 4th Street, Suite 5
Port Angeles, WA 98362

Subject: Comments on the Draft Clallam County Comprehensive Plan 2025

Dear Bruce Emery and the Clallam County Planning Team:

Thank you for the opportunity to review and provide feedback on Clallam County's Comprehensive Plan. As the Hoh Indian Tribe's Usual and Accustomed Area encompasses portions of Clallam County and because Forks is the closest town to the Hoh Indian Reservation, we are invested in the future that the County envisions. Following a review of the document, here are comments we'd like to share:

31.02.170 Designation of mineral resource land

As the plan states, "environmental impacts of mineral extraction can be substantial".¹ That level of ground disturbance can also have negative impacts on Tribal cultural assets and areas. If the County undertakes any actions that could potentially affect Tribal cultural resources, including analyzing whether resources are present in a SEPA process, the Hoh Tribal Chairperson and Tribal Historic Preservation Officer should be notified. We'd like to see Tribal consultation required and mentioned in the Comprehensive Plan so that our jurisdictions can work together and ensure valuable resources are not harmed.

31.02.282 Affordable housing issues & 31.02.283 Affordable housing policies

Developing more affordable housing in Forks and the surrounding area is a priority for Hoh Tribal members. The supply of affordable housing in the County does not currently meet demand. This affects both Tribal citizens and the Tribe's ability to attract and retain staff members. We appreciate the variety of housing policies and hope they will lead to a larger

¹ Comp. Plan, Public Review Draft, August 2025 at p. 29



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housing supply of varied types and affordability levels in Forks, the Three Rivers area, and Beaver.

31.02.340 Environment and open space policies

The Hoh Tribe is deeply invested in environmental protection and conservation. We run a robust Natural Resources Department dedicated to monitoring, restoration, and careful stewardship. We support many of the environmental policies within the Comprehensive Plan, but there are several areas in which these regulations could be strengthened to better protect our joint area's character and abundance:

- Wetlands in WA have been overwhelmingly developed, which is deeply troubling, given their ecological importance. Right now, Policy 9 in 31.02.340 (3) calls for no net loss of wetlands.² While no net loss has previously been standard practice, we are seeing wetlands continue to disappear. This policy is not protecting our ecosystems.³ It's time for bolder action. We encourage exploration and development of the "net ecological gain" or "NEG" concept in place of "no net loss".
- The general goals of the Habitat section in the Plan align with our own, including protecting habitat, restoring degraded fish habitat, etc. However, we'd like to see more specifics that will make environmental protections more concrete. Many of the policies contain the word "should" and are framed as goals rather than as strict requirements for development that could protect the environment.
- The Environment section does not discuss required riparian buffers. While the Forest Land Use section does discuss implementing best management practices as defined by the Forest Practices Act, we also advocate for establishing riparian buffers for all other types of land use as well. The County should consider policy language that adopts stream and river buffers the width of one 200-year site-potential tree height (SPTH) measured from the edge of the active channel or active floodplain, consistent with Washington Department of

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Fish and Wildlife Riparian Ecosystems guidance.⁴ Current buffers averaging 50-150 feet significantly under-protect riparian functions compared to optimal 200+ foot widths for large coniferous systems essential to salmon habitat. Whether addressed in the Comprehensive Plan policies or the Critical Areas Ordinance implementation regulations, these enhanced buffer standards are essential.

31.02.350 Historic and cultural resources policies

Consultation and notification prior to any action that may affect Tribal lands and/or resources is always the best policy. For this reason, we support 31.02.350 Policy 3. However, this should be expanded beyond development applications to consultation before changing zoning regulations and before any activity that will involve ground disturbance.⁵

31.02.426 Transportation – Goals and Policies:

Many Tribal members depend on public transportation around the Olympic Peninsula, including routes and connectors through Jefferson and Clallam County. In surveys we conducted about the Comprehensive Plan process, increased transportation around the Olympic Peninsula was a high priority. As Forks grows, we recommend including increased funding and support for the public bus routes that travel to Forks.

31.02.720 Utility policies

Clallam PUD is the service provider for the Hoh Indian Reservation. Due to its remote location, power outages are frequent on the Reservation. Demand for power on the Olympic Peninsula is likely to increase as more people move to the area, more people drive electric vehicles, and summer temperatures continue to rise. Electricity is central to keeping Tribal members healthy. The Comprehensive Plan can address these future issues by prioritizing upgrades to existing infrastructure and development of additional lines.

Emergency Management

⁴ WDFW, Riparian Ecosystem, Volume 2: Management Recommendations, December 2020, at p. 8

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The Hoh Indian Tribe would like to continue to work with both Clallam and Jefferson Counties to strengthen our emergency response abilities. Due to the remote nature of the Hoh Indian Reservation and the complexity of insurance jurisdictions, among other things, it is difficult to get adequate and timely emergency services on the Hoh Indian Reservation. The Tribe has had to watch buildings burn down because there is no structural fire response on the Reservation. While the Reservation lies in Jefferson County, the proximity of Forks means that Clallam County assets are often physically closer. Whether through the Comprehensive Plan, the Hazard Mitigation Plan, or other efforts, we would like to continue to work with both Counties and the City of Forks to find multi-jurisdictional solutions that keep everyone safe.

In conclusion

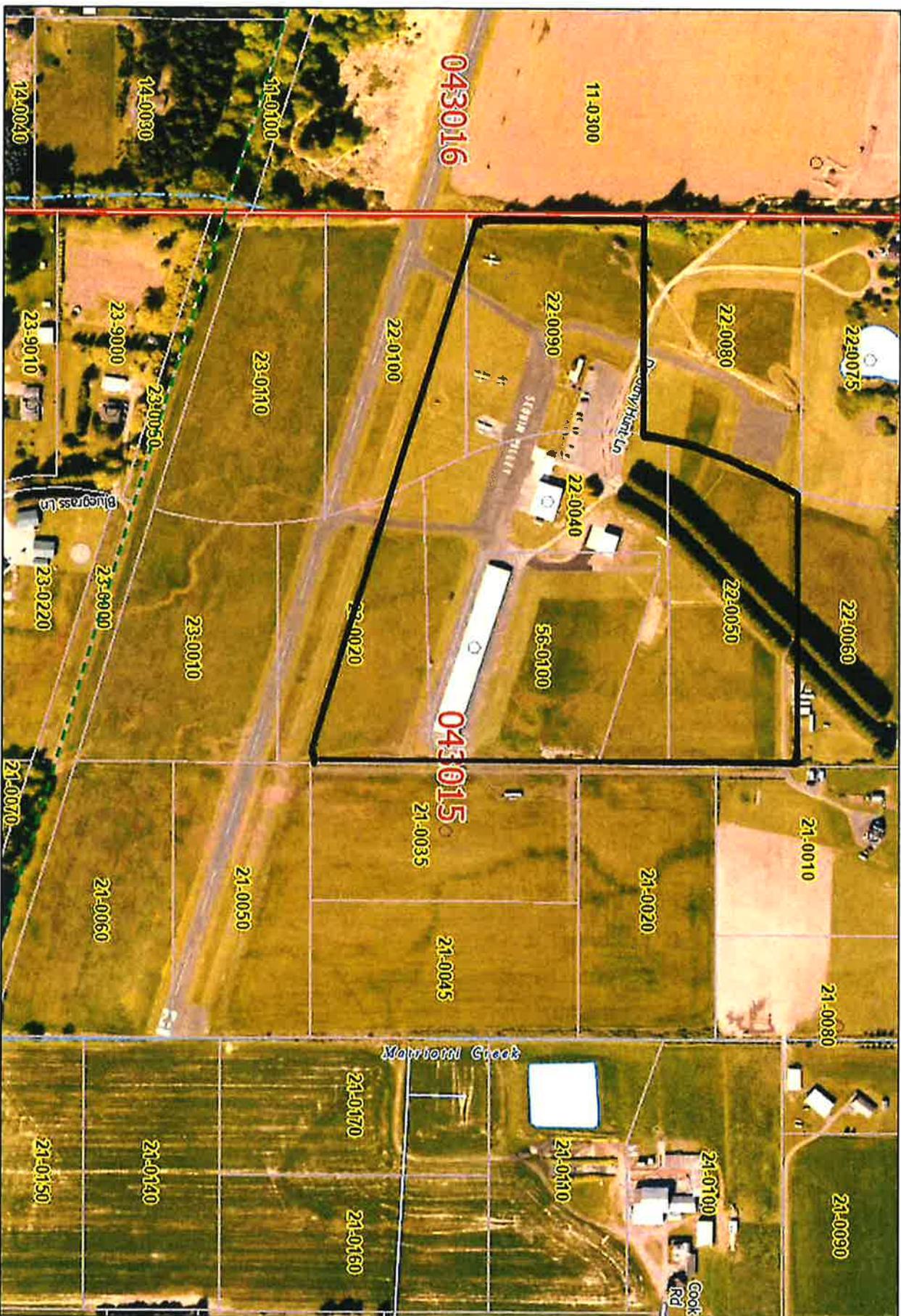
The Hoh Indian Tribe appreciates Clallam County's efforts to engage with Tribal concerns in the Comprehensive Plan update. We appreciate your revision of the plan based on previous edits provided, especially the response summary to our letter offering feedback on the Climate Element. **The Tribe looks forward to working with the County to strengthen protections for Treaty-protected resources and cultural heritage throughout Clallam County.**

Sincerely,

Hannah Tennent, Climate Change Specialist for the Hoh Indian Tribe

hannah.tennent@hohtribe-nsn.org

505-917-0490



We are happy to share our maps and hope you find them helpful. Please be advised, however, that these maps are intended to serve as a guide to the general location of features shown. The accuracy of the individual layers varies and layers may not align with one another. Determination of actual regulatory location of features shown on this map typically requires a field examination by qualified staff. Any person or entity that relies on any information contained herein does so at their own risk. Callam County makes no warranty of the accuracy or usefulness of this data.

https://webserver31.dallamcountywa.gov/server/rest/redirectories/arcsinfooutput/Callam_Print_Service_New_GPService/_ags_e99530ee-aa58-11f0-878e-c4044d863eb3.png



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Department of Community Development
County Courthouse
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Fax: (360) 417-2443
bruce.emery@clallamcountywa.gov

Memorandum

Date: January 14, 2026
To: Clallam County Planning Commission
From: Bruce Emery, Director of Community Development
Re: Planning Commission CPU Continued Public Hearing, 1/21/2026

Hello Planning Commission Members. The public hearing for the CPU will continue on January 21, 2026. My suggestion is that during the work session, we continue to work through the Policy Tables and other materials included in your 1/7/26 packet.

Enclosures

Rather than make new copies of all the materials included in the 1/7/26 packet, I have only included new materials or updated versions with changes included. Your packet includes:

- Letter from Hoh Indian Tribe dated January 5, 2026,
- Updated Table 3, Public Agency Testimony 010826
- Updated Table 4, Checklist Response 011226
- Excerpt CCC 31.02.350 for context on discussing historic and cultural resources policies, and
- Chapter 6, Washington State Wildland-Urban Interface Code.

Table 3 is the Policy Response to Public and Agency Testimony received during the public hearing for the CPU. This will continue to be an active document as new testimony is received. I have included the Letter from the Hoh Tribe as entry #25, along with possible policy responses. I included updates to Section 31.03.260(8), removing the John Hyer Farm from "*Historical and Cultural Resources*" in the Sequim-Dungeness Regional Plan (Item 11.d, p. 17). Also, and as requested, I included the text excerpt for Section 31.02.350 of the County-Wide Plan, *Historic and Cultural Resources Policies*, to give context to the discussion on Items 11.b (p. 16) and 25 (p. 37).

For future discussions, I would recommend referring to your printed, Draft Comprehensive Plan documents to review the context of the policies being discussed. We're using the enclosed table method to reduce paper and keep the topics and materials manageable. As an alternative, you can always refer to the current CPU Drafts that we post on our CPU web page at:

<https://www.clallamcountywa.gov/1842/Comprehensive-Plan-Update>. Simply scroll down to "Current Drafts" and click on the document you wish to review. We update

these drafts approximately once per month to incorporate changes and to keep them current to afford the public opportunity for review.

On a general note, the goal of Table 3 is to consolidate testimony and for staff to provide a possible policy response that addresses the concerns raised. While we work to keep those responses within reason and context of the GMA, we are not necessarily advocates for or against the policy choices. The Planning Commission is certainly free to apply their own judgement and approve, modify, or reject any proposed language.

Table 4 is the Policy Response to the items raised in the Commerce Checklist. These are items that require a policy response as determined by the Department of Commerce. The Table includes a new entry #5 that coincides new requirements under RCW 36.70A.070(1) requiring the County to reduce and mitigate risks posed by wildfire. The two proposed policies adopt portions of the Washington State Wildland-Urban Interface Code (Ch. 6) and the 2025 Clallam County Hazard Mitigation Plan. Both the Plan and the State Code will provide specific measures to help mitigate and defend against impacts and proliferation of wildfires. Chapter 6 of the Wildland-Urban Interface Code is provided in your packet.

Items to Carryover from 1/7/26 packet

To save paper, ink and time, several of the packet items from your January 7th meeting packet are still relevant for discussion during the January 21st meeting. Please be sure to review and/or have access to these items for the upcoming meeting. They include:

- Zoning text changes
- Transportation Element (includes LOS Map, updated Sections 31.02.410 through .425, and Technical Memorandum from Facet (December 5, 2025))
- Sequim Zoning Change Maps, including Water and Sewer Service Maps, and Staff Analysis Memorandum (December 2, 2025).

Transportation Element

Materials constituting the scope of the Transportation Element include a Technical memo provided by Facet NW that covers the relationship between land use choices and transportation impacts, Copy of Section 31.02.410 through .425 (Transportation Element) of the Comprehensive Plan with updated edits, and the Projected Intersection Traffic Count and LOS Map for the Sequim Urban Growth Area.

Sequim Land Use and Zoning Map Changes

In response to the 12/3/25 discussion on the proposed changes to the S(R-II) Zoning and Land Use designation, we provided a county-wide press release to media outlets including all papers and radio stations. Posting of right-of-way or private property (without permission) is not an option. We do feel that the latest effort, combined with all prior efforts, does exceed our notification requirements and obligations.

During the 12/3/25 discussion, some interest was expressed concerning neighborhoods #5 and #16. We feel there exists a strong argument to include neighborhood #5 due to location and likelihood for higher-density development. A new Zoning Change Map, Exhibit D, has been provided to represent this possible change. This area would add an additional 67 (potential) high-density units, for a total of 242 additional units with the other proposed changes. In contrast, I would recommend against consideration of neighborhood #16 as it is not included within the City's water service area, and therefore, has very poor prospect of ever realizing higher-density development potential. The maps for the Sequim Water Service Area and Sewer Service Maps are also included for your reference.

Other Items

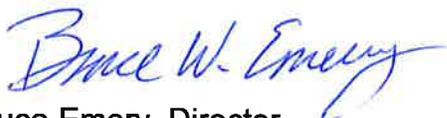
The question was raised during the 1/7/26 meeting whether (and presumably to what extent) rights or obligations articulated in the Comprehensive Plan are conferred. Generally speaking, the Comprehensive Plan, under the Planning Enabling Act (RCW 36.70) and the GMA (RCW 36.70A), establish local authority for the adoption of land use controls under the police powers of the state. They serve as:

- A basis for land use regulations
- A guide for decision-making
- A basis for substantive authority under the State Environmental Policy Act (RCW 43.21C)
- Are required to establish consistency between policies and regulations
- A basis for legal standing regarding its content

The primary authorities established by Comprehensive Plan are vested in the County. Specific policies can and do confer rights and obligations that have an impact on future decision-making and frame future regulations. Mandatory compliance with the statute means that, at a minimum, the requirements under state law will become requirements of the County. There also exists flexibility for the County to establish its own requirements and privileges (not inconsistent with state law), which typically translate into zoning and other regulations. In this regard, policies adopted under the Comprehensive Plan can and do confer rights and obligations.

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

Sincerely,



Bruce Emery, Director
Clallam County DCD



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In conclusion

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Sincerely,

Hannah Tennent, Climate Change Specialist for the Hoh Indian Tribe

hannah.tennent@hohtribe-nsn.org

505-917-0490

31.02.3530 Historic and cultural resources policies.

~~(1) Policy 1. All jurisdictions should work individually and cooperatively to identify, record, study and encourage the preservation, maintenance and use of lands, sites, and structures that have historical and archaeological significance. The early identification and resolution of conflicts between preservation of historical or archaeological resources and competing land uses should be promoted and facilitated.~~

(12) **Policy 12.** Preserve, restore, and maintain significant historical and cultural resources, including visual quality, along the County's scenic highways and roads.

(a) Avoid, minimize, or mitigate impacts of transportation projects on significant historical, cultural and archaeological resources.

~~(b) Sites and resources having known archaeological, historic, or cultural value should be protected. These sites/resources are important, nonrenewable resources and many are in danger of being damaged or lost because of ongoing development. Wherever possible, known sites should be permanently preserved for scientific study and/or public observation consistent with 36 CFR 800 and Chapter 27.53 RCW. If the presence of an archaeological site is suspected, then a survey should be conducted by an archaeologist.~~

~~(c) Proposed development on or adjacent to an identified archaeological, historic, or cultural site should be designed and operated to be compatible with continued protection of the archaeological, historic, or cultural site.~~

~~(d) The location of historic, cultural, and/or archaeological sites/resources should not be disclosed to the general public unless adequate provisions can be put in place to ensure long-term protection and preservation of such sites/resources.~~

(eb) Cooperatively plan, implement, and maintain corridor management plans for all proposed and existing Washington State Scenic and Recreational Highways (Hwy. 101 and Hwy. 112). Identify the long-term landscape character desired for scenic and recreational highways and their related cultural resources, and implement landscape maintenance practices appropriate to ensure the resources' lasting character.

(fe) Discourage additional commercial development parallel (immediately adjacent) to scenic and recreational highways where it has a negative impact on the scenic character of the route.

(3) ~~Policy 23. Clallam County shall recognize tribal nations in adoption of the Comprehensive Plan and development regulations.~~ Affected tribal nations shall be notified of development applications ~~or changes in development regulations~~ prior to action and be

given the opportunity to comment on the project's impact to tribal rights, as required by the State Environmental Policy Act.

CHAPTER 6

FIRE PROTECTION REQUIREMENTS

User note:

About this chapter: Chapter 6 establishes minimum fire protection requirements to mitigate the hazards to life and property from fire in the wildland-urban interface. The chapter includes both design-oriented and prescriptive mitigation strategies to reduce the hazards of fire originating within a structure spreading to wildland and fire originating in wildland spreading to structures.

Especially targeted for a systems-approach to fire protection are those new buildings that are deemed to be particularly hazardous under Chapter 5; these buildings are required to be sprinklered. Other hazard mitigation strategies include establishing around structures defensible space zones wherein combustible vegetation and trees are regulated and kept away from buildings and trees are located 10 feet crown-to-crown away from each other. Additional hazards that are dealt with in Chapter 6 include spark arresters on chimneys and regulated storage of combustible materials, firewood and LP-gas.

SECTION 601 GENERAL

601.1 Scope. The provisions of this chapter establish general requirements for new and existing buildings, structures and premises located within *wildland-urban interface areas*.

601.2 Objective. The objective of this chapter is to establish minimum requirements to mitigate the risk to life and property from wildland fire exposures, exposures from adjacent structures and to prevent structure fires spreading to wildland fuels.

SECTION 602 AUTOMATIC SPRINKLER SYSTEMS

602.1 General. An *approved* automatic sprinkler system shall be installed in all occupancies in new buildings required to meet the requirements for Class 1 ignition-resistant construction in Chapter 5. The installation of the automatic sprin-

kler systems shall be in accordance with nationally recognized standards.

SECTION 603 DEFENSIBLE SPACE

603.1 Objective. Provisions of this section are intended to modify the fuel load in areas adjacent to structures to create a *defensible space*.

603.2 Fuel modification. Buildings or structures, constructed in compliance with the conforming *defensible space* category of Table 503.1, shall comply with the *fuel modification* distances contained in Table 603.2. For all other purposes the *fuel modification* distance shall be not less than 30 feet (9144 mm) or to the lot line, whichever is less. Distances specified in Table 603.2 shall be measured on a horizontal plane from the perimeter or projection of the building or structure as shown in Figure 603.2. Distances specified in Table 603.2 are allowed to be increased by the code official because of a site-

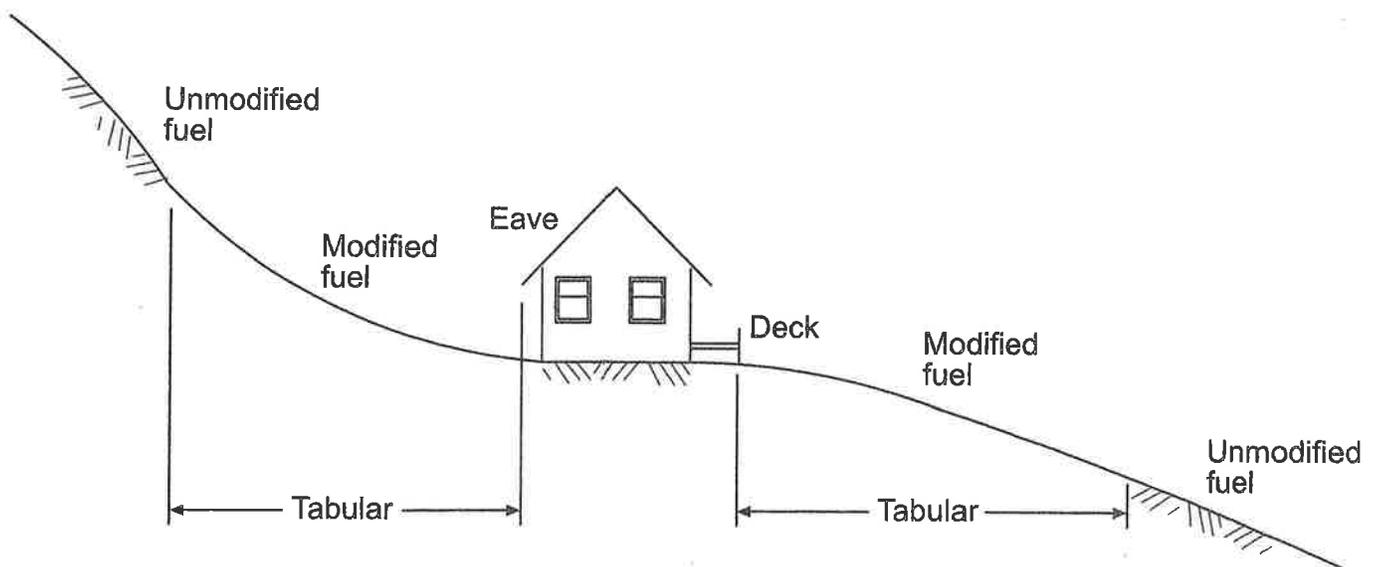


FIGURE 603.2
MEASUREMENTS OF FUEL MODIFICATION DISTANCE

FIRE PROTECTION REQUIREMENTS

specific analysis based on local conditions and the fire protection plan.

**TABLE 603.2
REQUIRED DEFENSIBLE SPACE**

WILDLAND-URBAN INTERFACE AREA	FUEL MODIFICATION DISTANCE (feet) ^a
Moderate hazard	30
High hazard	50
Extreme hazard	100

For SI: 1 foot = 304.8 mm.

a. Distances are allowed to be increased due to site-specific analysis based on local conditions and the fire protection plan.

603.2.1 Responsible party. Persons owning, leasing, controlling, operating or maintaining buildings or structures requiring defensible spaces are responsible for modifying or removing nonfire-resistive vegetation on the property owned, leased or controlled by said person.

603.2.2 Trees. Trees are allowed within the *defensible space*, provided that the horizontal distance between crowns of adjacent trees and crowns of trees and structures, overhead electrical facilities or unmodified fuel is not less than 10 feet (3048 mm).

603.2.3 Groundcover. Deadwood and litter shall be regularly removed from trees. Where ornamental vegetative fuels or cultivated ground cover, such as green grass, ivy, succulents or similar plants are used as ground cover, they are allowed to be within the designated *defensible space*, provided that they do not form a means of transmitting fire from the native growth to any structure.

SECTION 604 MAINTENANCE OF DEFENSIBLE SPACE

604.1 General. Defensible spaces required by Section 603 shall be maintained in accordance with Section 604.

604.2 Modified area. Nonfire-resistive vegetation or growth shall be kept clear of buildings or structures, in accordance with Section 603, in such a manner as to provide a clear area for fire suppression operations.

604.3 Responsibility. Persons owning, leasing, controlling, operating or maintaining buildings or structures are responsible for maintenance of *defensible spaces*. Maintenance of the *defensible space* shall include modifying or removing non-fire-resistive vegetation and keeping leaves, needles and other dead vegetative material regularly removed from roofs of buildings and structures.

604.4 Trees. Tree crowns extending to within 10 feet (3048 mm) of any structure shall be pruned to maintain a minimum horizontal clearance of 10 feet (3048 mm). Tree crowns within the *defensible space* shall be pruned to remove limbs located less than 6 feet (1829 mm) above the ground surface adjacent to the trees.

604.4.1 Chimney clearance. Portions of tree crowns that extend to within 10 feet (3048 mm) of the outlet of a chimney shall be pruned to maintain a minimum horizontal clearance of 10 feet (3048 mm).

604.4.2 Deadwood removed. Deadwood and litter shall be regularly removed from trees.

SECTION 605 SPARK ARRESTERS

605.1 General. Chimneys serving fireplaces, barbecues, incinerators or decorative heating appliances in which solid or liquid fuel is used, shall be provided with a spark arrester. Spark arresters shall be constructed of woven or welded wire screening of 12 USA standard gage wire (0.1046 inch) (2.66 mm) having openings not exceeding 1/2 inch (12.7 mm).

605.2 Net free area. The net free area of the spark arrester shall be not less than four times the net free area of the outlet of the chimney.

SECTION 606 LIQUEFIED PETROLEUM GAS INSTALLATIONS

606.1 General. The storage of liquefied petroleum gas (LP-gas) and the installation and maintenance of pertinent equipment shall be in accordance with the *International Fire Code* or, in the absence thereof, recognized standards.

606.2 Location of containers or tanks. LP-gas containers or tanks shall be located within the *defensible space* in accordance with the *International Fire Code*.

SECTION 607 STORAGE OF FIREWOOD AND COMBUSTIBLE MATERIALS

607.1 General. Firewood and combustible material shall not be stored in unenclosed spaces beneath buildings or structures, or on decks or under eaves, canopies or other projections or overhangs. Where required by the code official, storage of firewood and combustible material stored in the *defensible space* shall be located not less than 20 feet (6096 mm) from structures and separated from the crown of trees by a horizontal distance of not less than 15 feet (4572 mm).

607.2 Storage for off-site use. Firewood and combustible materials not for consumption on the premises shall be stored so as to not pose a hazard. See Appendix A.

CPU Policy Response Table 3: Public/Agency Testimony

Clallam County Comprehensive Plan Update Summary of Public Testimony and Corresponding Recommendations as of January 8, 2026.

The following summarizes public testimony received as of the opening of the Public Hearing for the Comprehensive Plan Update (CPU) before the Planning Commission (November 5, 2025). Also included are corresponding policy recommendations, where appropriate for consideration by the Planning Commission. All written and/or recorded testimony will be retained as part of the record for the CPU.

Summary of Testimony Received	Recommended Policy/Response
<p>1.a) Clallam County Public Works, Suggestions regarding policy responses to public comment, 11/5/2025. Suggested edits concerning Public Comment #1, CCC 31.02.420(1)(c)(ii).</p>	<p>Recommended Policy, Public Comment #1: CCC 31.02.420(1)(c)(ii). Review need for new or alternative highway alignment to improve circulation and regional mobility in the Port Angeles-subregion. Observe and track potential regional congestion points along the SR-101 corridor throughout Clallam County, and plan for new highway corridors and bypass alternatives as needed to address congestion and maintain arterial flow and efficient regional mobility.</p> <p>Suggested Language: <u>“Proactively communicate and coordinate with the Washington State Department of Transportation to identify and plan for US 101 Highway corridor improvements, new alignments, and bypass routes needed to improve circulation, address congestion, and maintain arterial flow and efficient regional mobility throughout the county.”</u></p> <p>Additional staff Recommendation: Include <u>“provide resilience”</u> in the objectives of this section for internal consistency with CCC 31.02.820.</p>
<p>1.b) Clallam County Public Works, Suggestions regarding policy responses to public comment, 11/5/2025. Suggested edits concerning Public Comment #2, CCC 31.02.420(1)(c)(iii). In their comment, it was noted that the recommended policy change is</p>	<p>Recommended Policy, Public Comment #2: CCC 31.02.420(1)(c)(iii). Pursue the development of a new highway connection from Neah Bay to Ozette along or near the coast.</p>

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<p>consistent with the 6-Year TIP that includes a project for a "Preliminary Study for Neah Bay to Forks Road."</p>	<p>Suggested Language: <u>"Assess options and feasibility of alternative/emergency access routes for the SR 112 north coast area, including an alternative route from Neah Bay to Forks."</u></p>
<p>1.c) Clallam County Public Works, Suggestions regarding policy responses to public comment, 11/5/2025. Comments included context that the North Olympic Peninsula Lead Entity (NOPL) and the North Pacific Coast Lead Entity (NPCLE) have a process for prioritizing fish habitat improvement projects, including culvert replacements. The proposed language recognizes and incorporates this effort.</p>	<p>Recommend Policy, Public Comment #49, CCC 31.02.340(1)(f): Clallam County shall prioritize culvert replacement and similar issues that presently result in barriers to fish passage as part of the Six-Year Transportation Improvement Plan (TIP) process.</p> <p>Suggested language: <u>"Consider culvert replacement for fish passage improvements associated with Clallam County managed roads prioritized by the Lead Entities and that have secured funding or where potential finding (e.g., grants) has been identified. Additional considerations should include other benefits such as replacement of conveyance infrastructure that is undersized, damaged, or at or near approaching normal design lifespan."</u></p>
<p>2.a) Clallam County Public Works, Suggestions regarding policy responses to public comment, 11/6/2025. Application should be limited to local access roads. State and federal standards applies to collectors and arterials. Using "considered" allows for decision process under 6-Year TIP.</p>	<p>Recommended Policy, Planning Commission Recommendation # 6, CCC 31.02.420(1)(a)(vi): <u>"For local access roads</u> Where there exists a clear public benefit and local circumstances support, traffic calming techniques, such as raised crosswalks, variation in horizontal alignments, and other design features, should be considered <u>utilized</u> consistent with adopted AASHTO Guidelines for the implementation of such features; provided, said design standards do not conflict with locally-adopted design standards."</p>
<p>2.b) Clallam County Public Works, Suggestions regarding policy responses to public comment, 11/6/2025. Proposed changes in recognition that large equipment (dump trucks, etc.) are not yet available in electric power. Also, implementing change as a resiliency strategy first requires establishing</p>	<p>Consider new Section CCC 31.02.820(2)(c): "Although Clallam County is not required under House Bill 1181 to reduce greenhouse gas emissions, opportunities to take such measures would nevertheless be in the public interest and could improve resiliency. Therefore, with <u>following implementation of</u> increased resiliency in energy generation and transmission, the County should explore grant funding and other resources for the transition of the County's small <u>small</u> vehicle fleet</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>local energy sources. Otherwise, it leaves the community vulnerable.</p>	<p>from gas/diesel-powered to electric-powered or other renewable energy sources, where feasible and practicable. The same should be pursued concerning gas-powered maintenance equipment.”</p>
<p>3) Emailed Testimony received from Ed Bowen, 11/5/25.</p>	<p>Requests retaining the PRC Vision Statement presently articulated under CCC 31.06.010. Staff agrees with approval of this request.</p>
<p>4.a) Washington Department of Fish and Wildlife, 11/5/2025. The Voluntary Stewardship Program (VSP) is a highly successful program that creates incentives and assistance through the Conservation District to increase protections for critical areas occurring on agricultural lands. Rejected by PC, 11/19/25.</p>	<p>Proposed edits to CCC 31.02.120(6). “Agricultural land users shall be encouraged to maintain water quality, protect fish and wildlife habitat consistent with commercial agriculture and prevent erosion of valuable agricultural soils. <u>To achieve this, Clallam County will pursue enrollment in the Voluntary Stewardship Program (VSP) in partnership with the Clallam Conservation District, to create a non-regulatory approach to protecting critical areas on agricultural lands.</u>”</p>
<p>4.b) Washington Department of Fish and Wildlife, 11/5/2025. The proposed change is consistent with tenants of the GMA. Note, “forest” was not stricken per comments as this appears to have been an error in the comment.</p>	<p>Proposed edits to CCC 31.02.140(1). “Retain and prevent conversion of <u>designated commercial</u>suitable forest land in the County in commercial forest land use, because of general economic benefits to the people of the County derived from forests, including timber production and processing, watershed conservation, recreation, and fish and wildlife conservation.”</p>
<p>4.c) Washington Department of Fish and Wildlife, 11/5/2025. The comments accurately cite WAC 365-196-480(2)(e) as requiring analysis of commercial forest lands <i>on a countywide basis</i>.</p>	<p>Proposed edits to CCC 31.02.140(24). “Land designated as commercial forest shall remain in this classification unless a strong case can be made that the zoning could be changed without affecting the commercial viability of the surrounding forest land <u>on a countywide basis</u>. Zone change applications shall meet one of the following criteria:”</p>
<p>4.d) Washington Department of Fish and Wildlife, 11/5/2025. Changes intended to</p>	<p>Proposed edits to CCC 31.02.150(3). “Environmental impacts of mineral extraction can be substantial. Aggregate production temporarily</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>better align with WAC 197-11-768, 365-190-080 and 365-196-830.</p>	<p>obliterates entire minesite ecosystems, but this loss can be mitigated minimized with carefully sequenced reclamation. The effects of truck traffic can be a primary concern in designating construction aggregate mines. Damage to river beds can be another major impact of mining. Channel bar scalping can reduce the probability of flooding but can also change the river-bed morphology and result in cascading ecological impacts harming fish populations and aquatic habitat functions. Possible reduction of the quantity of groundwater is a concern in new mineral sites...</p>
<p>4.e) Washington Department of Fish and Wildlife, 11/5/2025. Suggested language to improve clarity.</p>	<p>Proposed edits to CCC 31.02.2560(1)(d). "An adequate buffer is required adequate to ensure that harvesting of timber or crops on adjacent resource lands is not precluded."</p>
<p>4.f) Washington Department of Fish and Wildlife, 11/5/2025. Changes to align with WAC 365-190-080 and 365-196-830.</p>	<p>Proposed edits to CCC 31.02.2560(1)(h). "The master planned resort is consistent with development regulations of the County to protect critical areas <u>to ensure no net loss of ecological functions and values.</u>"</p>
<p>4.g) Washington Department of Fish and Wildlife, 11/5/2025. Implements full mitigation sequence per WAC 197-11-768.</p>	<p>Proposed edits to CCC 31.02.2560(1)(i). "On-site and off-site infrastructure impacts are fully considered and <u>follow the full mitigation sequence</u>mitigated."</p>
<p>4.h) Washington Department of Fish and Wildlife, 11/5/2025. Reflects language and intent of WAC 365-190-080 and 365-196-830.</p>	<p>Proposed edits to CCC 31.02.340(1)(c). "The critical areas ordinance shall be utilized by Clallam County to help achieve environmental objectives <u>including no net loss of critical area function and values,</u> prevent environmental degradation, and to manage land use activities within the natural and intrinsic constraints of the landscape..."</p>
<p>4.i) Washington Department of Fish and Wildlife, 11/5/2025. Proposed language is internally consistent with prevention being less problematic than restoration.</p>	<p>Proposed edits to CCC 31.02.340(1)(e). "Clallam County shall work with other agencies, tribes and individuals to prevent additional listing <u>proactively protect populations</u> of fish, wildlife and plants under the Endangered Species Act through pro-active (rather than reactive)</p>

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	<p>planning and implementation of proper land use practices <u>and conservation measures.</u>”</p>
<p>4.j) Washington Department of Fish and Wildlife, 11/5/2025. Given the process identified earlier under Comment # 1.c, staff does not support this change.</p>	<p>Proposed edits to CCC 31.02.340(1)(f), “Clallam County shall prioritize culvert replacement and similar issues that presently result in identifying and removing barriers to fish passage <u>including undersized or degraded culverts</u> as part of the Six-Year Transportation Improvement Plan (TIP) process.”</p> <p>Note, changes made pursuant of Testimony 1.c, above, captured the above recommended language with the inclusion of “degraded.”</p>
<p>4.k) Washington Department of Fish and Wildlife, 11/5/2025. Proposed language that establishes consistency with CCC 35.20.270(4) and climate policies of CCC 31.02.820. Staff recommends Subsection (c) be amended to read: “...<u>locate and ensure the design of new development is conditioned to avoid...</u>” as a regulatory agency, Clallam County does not design a project, but ensures the project meets regulation.</p>	<p>Proposed edits to CCC 31.02.340(6).</p> <p>(a) <i>Policy 16.</i> “Clallam County should<u>will</u> work to implement<u>achieve</u> alternatives for sewage treatment plant discharges to marine waters.</p> <p>(b) <i>Policy 17.</i> Clallam County shall preserve the scenic, aesthetic and ecological qualities of the marine shorelines of Clallam County, in harmony with those uses which are deemed essential to the <u>life and safety</u> of its residents. Clallam County shall implement marine resource goals through the Clallam County Shoreline Master Program and/or critical areas ordinance, as now or hereafter amended.</p> <p><u>(c) (New Policy 18). Clallam County shall locate and design new development to avoid the need for future shoreline stabilization to the extent feasible.”</u></p>
<p>4.l) Washington Department of Fish and Wildlife, 11/5/2025. Maintaining habitat connectedness is a substantial part of ecosystem health.</p>	<p>Proposed edits to CCC 31.02.340(7)(a). “Land use practices should protect <u>connect</u>, and enhance habitat corridors, diversity and richness, and ensure protection <u>and connection</u> of wildlife corridors and habitat for threatened and endangered species. Wildlife corridors and riparian</p>

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	<p>areas should be maintained as important community infrastructure <u>and to promote wildlife diversity across connected landscapes.</u>"</p>
<p>4.m) Washington Department of Fish and Wildlife, 11/5/2025. Amend 31.02.340(9)(a) to limit development in flood hazard areas, preserve ecological functions and maintain public access.</p>	<p>Proposed edits to CCC 31.02.340(9)(a). "Flood control should be undertaken in the context of varied uses including agricultural and residential, fish and wildlife habitat, water supply, open space, and recreation. Land use and related regulations and zoning should reflect the natural constraints of floodplains, meander zones, and riparian habitat zones <u>and limit development within these areas.</u> Flood control measures should reserve<u>preserve ecological and community benefits such as floodplain functions and public access opportunities to the fullest extent possible opportunities for other uses, including public access.</u>"</p>
<p>4.n) Washington Department of Fish and Wildlife, 11/5/2025. Avoidance of impacts are preferable to minimizing or mitigating impacts.</p>	<p>Proposed edits to CCC 31.03.195(5)(b). "<u>Avoid and Minimize</u> the public costs and potential dangers associated with inappropriate development in frequently flooded areas, geologically hazardous areas, wetlands, fish and wildlife <u>habitat</u> conservation habitat areas, and areas with a critical recharging effect on aquifers."</p>
<p>4.o) Washington Department of Fish and Wildlife, 11/5/2025.</p>	<p>Proposed edits to CCC 31.05.210(6)(a). Eliminate reference to "state listed" with respect to bald eagles (no longer state-listed, only Federal).</p>
<p>4.p) Washington Department of Fish and Wildlife, 11/5/2025. Bald eagles are a federal issue, not state.</p>	<p>Proposed edits to CCC 31.05.210(6)(c). "Clallam County should work with the <u>U.S. Fish and Wildlife Service</u>Washington Department of Wildlife to develop an advanced Bald Eagle Management Plan for designated priority bald eagle habitat in the vicinity of Clallam Bay/Seki Urban Growth Area."</p>
<p>4.q) Washington Department of Fish and Wildlife, 11/5/2025. Incorporating "retrofitting" is consistent with Subsection (3)(b).</p>	<p>Proposed edits to CCC 31.02.820(3)(a). "Develop or modify building standards to reduce the impacts of climate change on indoor and outdoor building features. This may include requiring low-impact development <u>and retrofitting existing buildings and stormwater runoff...</u>"</p>

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<p>4. r.) Washington Department of Fish and Wildlife, 11/5/2025. Staff concurs that maintaining larger tracts of land is integral to ecosystem health and one of the key benefits provided by forest lots.</p>	<p>Proposed edits to CCC 31.02.820(7)(b). "Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate refugia and critical habitats to strive for no net loss of ecosystem attributes, with a focus on achieving net ecological gains. Expand habitat protection, quality, and connectivity through designations such as conservation areas, expanded buffers, <u>maintaining large blocks of commercial and private forest lands</u>, greenbelts, wildlife and open space bridges and corridors. Incorporate climate considerations in determining permissible activities within wetlands and wildlife habitats. "</p>
<p>5) Emailed testimony received from Phyllis Sprinkle, 11/8/25. Supports adoption of policies for the protection of nighttime sky from the impacts of glare, consistent with recommendations from DarkSky Olympic Peninsula (see Public Comment, # 44).</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>6) Emailed testimony received from Nancy Field, 11/8/25. Same as # 5, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>7) Emailed testimony received from Pete Saari, 11/9/25. Same as # 5, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>8) Emailed testimony received from John Gussman, 11/10/25. Same as # 5, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>9) Emailed testimony received from Jan Standish, 11/10/25. Same as # 5, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>10. a) Jamestown S'Kallam Tribe, November 19, 2025. Definitions.</p>	<p>Propose new definition under CCC 31.02.050(17): "<u>Environmental Justice</u>" means the fair treatment and meaningful involvement of all people regardless of race, color, national origin, tribal affiliation, disability</p>

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<ul style="list-style-type: none"> • Add definition for “Environmental Justice (recommends using Dept. of Commerce’s definition).” • Define “Best Available Science.” • Clarification is needed to understand the newly added section (j) under the “rural character” definition, which seems to contradict sections F, G and I by supporting more extensive development. If the intention of section j is to support gathering spaces and community connection, clarify that this would be through focused or targeted zoning in already developed areas. 	<p><u>or income with respect to the development, implementation and enforcement of environmental laws, rules and policies that affect human health and the environment. Environmental justice ensures that laws, rules and policies help protect vulnerable and overburdened communities from unfair environmental and health impacts. It focuses on providing equal access to resources and benefits, preventing harm, and creating sustainable and thriving communities for everyone.”</u></p> <p>Recommend a new Section 31.02.050(7): <u>“Best Available Science (BAS),” means the current and best available scientific information derived from valid scientific processes, including peer review, standardized methods, logical conclusions and reasonable inferences, quantitative analysis, proper context, and references, consistent with the criteria specified under WAC 365-195-900 through 925. BAS also incorporates a synthesis of the current scientific body of knowledge meeting the criteria specified within this definition.”</u></p> <p>Propose edits to CCC 31.02.050(32)(j): “Areas that foster and reflect a strong sense of community ties, local identity, and shared rural values through land use patterns that support gathering spaces; civic institutions; and integrational continuity. These areas promote social cohesion by maintaining development scales and zoning that reinforce community interaction, volunteerism, and locally rooted traditions.”</p>
<p>10.b) Jamestown S’Klallam Tribe, November 19, 2025. Under CCC 31.02.100(2), include in the list of identified land for public uses, include high-value ecosystems services (e.g. natural flood control, water storage, water filtration), wildlife corridors and riparian areas.</p>	<p>CCC 31.02.100(2) is verbatim language from RCW 36.70A.150. Recommended language may be better located under CCC 31.02.340.</p> <p>Propose new Section 31.02.340(1)(g): <u>“Policy 7. In addition to the identification of lands suitable for public purposes articulated under CCC 31.02.100(2), Clallam County should recognize the public benefits and work towards the acquisition and protection of lands that provide high-</u></p>

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	<p><u>value ecosystem services (e.g. natural flood control, water storage, water filtration), wildlife corridors, shorelines and riparian areas.</u>"</p>
<p>10.c) Jamestown S’Klallam Tribe, November 19, 2025. Amend Master Planned Resorts policy (CCC 31.02.250):</p> <ul style="list-style-type: none"> • Include a Section that clearly indicates that local Tribes be included in the planning process before development agreements are completed. • Amend Section (g) to recognize need for preservation of agricultural and forest lands, and sensitive habitats when considering MPPRs. 	<p>Propose new Section CCC 31.02.250(1)(k): <u>"Local tribes will be provided notice of application and will be included in the planning process before any development agreements or approvals are granted for a master planned resort."</u></p> <p>Propose edits to Section CCC 31.02.250(1)(g): "The County finds that the land is better suited, and has more long-term economic importance, for the master planned resort than for no longer viable for the commercial management and harvesting of timber, and is not currently or likely to be placed in or agricultural production, if located on land that otherwise would be designated as forest or agricultural land of long-term commercial significance."</p>
<p>10.d) Jamestown S’Klallam Tribe, November 19, 2025. Amend Environment and Open Space Policies (31.02.340):</p> <ul style="list-style-type: none"> • Section (1)(b): Add to the sentence the following underlined additions: "Prevention is less expensive than reversing pollution and ecosystem impacts later. Clallam County should consider the potential impacts and costs of treatment, remediation and restoration of environmental degradation resulting from land use practices, before such practices are allowed." • Section (1)(e): Add to the sentence the following underlined additions: "Clallam County shall work with other agencies, tribes and individuals to prevent additional listing, uplisting or local population 	<p>Propose edits to Section 31.02.340(1)(b): "Prevention is less expensive than cleaning<u>reversing</u> up <u>pollution and ecosystem impacts</u> later. Clallam County should consider the potential impacts and costs of treatment, or <u>remediation and restoration</u> for <u>of</u> environmental degradation resulting from land use practices, before such practices are allowed."</p> <p>Do not recommend edits to CCC 31.02.340(1)(e). Changes made in response to WDF&W (# 4.i, above) already changed the dynamic of the section.</p>

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<p>declines of fish, wildlife and 3 plants under the Endangered Species Act through proactive (rather than reactive) planning and implementation of proper land use practices.”</p> <ul style="list-style-type: none"> • New Section (1)(g): Add subsection G. Policy no. 7 as an addition to the new policy no. 6 to 32.02.340(1): “Clallam County will prioritize removal or retrofitting infrastructure that is placed within channel migration zones of streams and rivers to minimize negative impacts to fish and wildlife.” • New Section (4)(d): Make the final sentence of 31.02.340(4)(c) its own section D to highlight its importance and improve clarity and scope. Suggested change: “(D) Policy 13. Clallam County should undertake further studies of the groundwater regime of the County so that the factors influencing the quantity, quality and flow patterns of groundwater are more precisely known. These studies should prioritize...” 	<p><u>Proposed new Section 31.02.340(1)(g): “Clallam County will prioritize removal or retrofitting infrastructure that is placed within designated channel migration zones of streams and rivers to minimize negative impacts to fish and wildlife and improve resilience.”</u></p> <p><u>Propose new Section 31.02.340(4)(d): “Policy 13. Clallam County should undertake further studies of the groundwater regime of the County so that the factors influencing the quantity, quality and flow patterns of groundwater are more precisely known. These studies should prioritize:</u></p> <ol style="list-style-type: none"> <u>i. Updating aquifer mapping and flow patterns focusing on vulnerability assessments related to sea level rise and saltwater intrusion.</u> <u>ii. Analyzing the impacts of climate change on groundwater supply, integrating projected future water demand, and assessing the feasibility of groundwater supplementation.</u> <u>iii. Implementing findings to direct withdrawals toward the least hydrologically connected and reserve shallow wells as back-up supplies, reducing their use as primary municipal sources.”</u>
<p>10.e) Jamestown S’Klallam Tribe, November 19, 2025. Amend Climate Change and Resiliency Goals and Policies (CCC 31.02.820):</p>	

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<ul style="list-style-type: none"> Section 31.02.820(1): Consider adding a section that encourages agricultural water conservation programs (i.e. through Clallam Conservation District, WA Water Trust or other responsible entity) that put existing irrigation water rights to non-traditional beneficial uses without compromising their water rights. There needs to be more outreach and policies to disincentivize intentional inefficient use to demonstrate continuous beneficial use. Section 31.02.820(1)(a) should include riparian areas as an ecosystem function improvement category. "Policy 1.1: Preserve land for long-term agricultural use, promote a regenerative framework, and restore ecosystem function on farms, such as wetlands, ponds, and riparian areas to preserve carbon sinks, promote water storage, improve soil health, and provide additional ecosystem services." Section 31.02.820(1)(c) should include technical assistance for shifting to high-value, low water-use crops. "Encourage farmers to adopt sustainable business practices such as regenerative farming, water storage, shift to high-value, low water-use crops and upgrading irrigation." Section 31.02.820(3)(b): Consider adding to the sentence "Specific activities to support energy justice may include expanding low-income energy assistance programs, promoting existing 	<p>Proposed new Section 31.02.820(1)(e): "<u>Policy 1.5: Encourage and promote agricultural water conservation programs through the Clallam Conservation District, Washington Water Trust, and other responsible entities. Consider the strategic use of irrigation water for non-traditional beneficial uses without compromising existing water rights and focus on disincentivizing intentional inefficient use simply to demonstrate continuous allocated use.</u>"</p> <p>Propose amending Section 31.02.820(1)(a): "<u>Policy 1.1: Preserve land for long-term agricultural use, promote a regenerative framework, and restore ecosystem function on farms, such as wetlands, and ponds, and riparian areas</u> to preserve carbon sinks, promote water storage, improve soil health, and provide additional ecosystem services."</p> <p>Propose amending Section 31.02.820(1)(c): "... Encourage farmers to adopt sustainable business practices, such as regenerative farming, water storage, <u>shift to high-value/low water-use crops</u>, and upgrading irrigation..."</p> <p>Propose amending Section 31.02.820(3)(b): "Specific activities to support energy justice may include expanding low-income energy assistance programs, promoting existing weatherization incentives and assistance, upgrading cooling infrastructure in facilities serving vulnerable populations, and implementing alternatives like <u>preserving</u></p>
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<p>weatherization incentives and assistance, 4 upgrading cooling infrastructure in facilities serving vulnerable populations, and implementing alternatives like preserving and increasing tree cover, shade structures and other passive cooling designs.”</p> <ul style="list-style-type: none"> Section 31.02.820(4)(a): Consider adding to the sentence “This may include incorporating riparian and stream habitat conservation measures into land use and infrastructure (transportation, water, sewer, electricity and zoning) plans to protect salmonid (typo correction) habitats developed by the County in partnership with cities, Tribes, service providers, and state agencies.” Section 31.02.820(7)(a): Consider adding several terms to this section. “Prepare ecosystems for climate impacts by implementing restoration actions for streams, wetlands, and watersheds, focusing on habitat connectivity, reducing invasive species, and improving watershed processes. This includes restoring riparian vegetation, floodplains, and stream structures to protect native fish and other aquatic life. Enhance habitat and community resilience to climate change by protecting and restoring coastal ecosystems, adapting to sea-level rise, and focusing on submerged aquatic vegetation and shellfish restoration for 	<p><u>and increasing tree cover, and adding shade structures and other passive cooling designs.</u>”</p> <p>Propose amending Section 31.02.820(4)(a): “... This may include incorporating riparian and stream habitat conservation measures into land use and infrastructure plans to protect salmonid habitats (transportation, water, sewer, electricity <u>and zoning</u>) <u>plans to protect salmonid habitats</u> developed by the County in partnership with cities, Tribes, service providers, and state agencies.”</p> <p>Propose amending Section 31.02.820(7)(a): “<i>Policy 7.1</i>: Prepare ecosystems for climate impacts by implementing restoration actions for streams, wetlands, and watersheds, focusing on <u>habitat</u> connectivity, reducing invasive species, and improving watershed processes. This includes restoring riparian vegetation, floodplains, and stream structures to protect native fish and other aquatic life. Enhance habitat and community resilience to climate change by protecting and restoring coastal ecosystems, addressing<u>adapting to</u> sea-level rise, and focusing on submerged aquatic vegetation <u>and shellfish restoration</u> for habitat and “blue” carbon storage. Evaluate shoreline restoration and cleanup efforts, including concerns for Tribal cultural resources.”</p>
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<p>habitat and “blue” carbon storage. Evaluate shoreline restoration and cleanup efforts, including concerns for Tribal cultural resources.”</p> <ul style="list-style-type: none"> Section 31.02.820(7)(b): Consider rewording the first sentence to – “Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate change-mitigating systems and critical habitats that provide valuable ecosystem services. At a minimum, ensure no net loss of ecosystem function with a focus on achieving net ecological gains.” Section 31.02.820(12)(b): Consider adding an additional sentence to the effect of – “Promote lawn alternatives through xeriscaping and other low-water use, low maintenance designs. Clallam Conservation can provide direct consulting or provide resources to landowners to help facilitate lawn conversions and create co-benefits of reducing water use and promoting native species that support local wildlife and pollinators.” The Section 31.02.820(12)(e): Consider adding an expansion of water reuse by publicly owned treatment works to this section. 	<p>Propose amending Section 31.02.820(7)(b): “Policy 7.2: Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate change-mitigating systems <u>refugia</u> and critical habitats that <u>provide valuable ecosystem services. At a minimum, ensure strive for no net loss of ecosystem functions <u>attributes</u>, with a focus on achieving net ecological gains...”</u></p> <p>Propose amending Section 31.02.820(12)(b): “... Encourage residents to reduce water consumption through smart grid water use, repairing infrastructure, water reclamation systems, smart irrigation technologies, and updated water rates to discourage lawn watering. <u>Promote lawn alternatives through xeriscaping and other low-water use, low maintenance designs. The Clallam Conservation District can provide resources to landowners to help facilitate lawn conversions and create co-benefits of reducing water use and promoting native species that support local wildlife and pollinators.</u> Promote incentives for sustainable food cultivation.”</p> <p>Propose amending 31.02.820(12)(e) “... This includes maximizing on-site natural gas co-generation from anaerobic digesters, exploring the proximity of wastewater facilities to high-risk areas, and improving the wastewater access routes <u>and expanding water reuse by publicly owned treatment facilities.</u>”</p>
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<p>10.f) Jamestown S'Klallam Tribe, November 19, 2025. Amend Sequim-Dungeness Regional Plan (CCC 31.03.455): Clallam County should articulate a strategy to address nearshore impacts from residential use in low-bank shoreline areas along the Strait of Juan de Fuca, in the Dungeness-Jamestown neighborhood focus section. The section should discuss the water quality concerns and challenges of siting and maintaining septic systems in high saturation areas. The section should also discuss the nearshore impacts and concerns from residential nearshore armoring and outline the requirements Clallam County established for designated critical habitat of listed species under 5 the Endangered Species Act. This section should summarize the steps the County will take to engage the low-bank shoreline neighborhoods to proactively reduce/limit the harmful nearshore impacts and develop meaningful compensatory mitigation for impacts that cannot be remediated in the short-term.</p>	<p>Propose new Section 31.03.465(3): Shorelands.</p> <p><u>(a) Policy 5. The areas of Three Crabs Road, Seashore Lane, and portions of Jamestown Road and Jamestown Beach Lane are located within a low-bank shoreline area where impacts from upland development can result in substantial impacts to the near-shore environment. As identified climate risks, sea level rise and increasing magnitude and frequency of storm events also place such areas at risk of substantial harm from erosion, flooding, salt-water intrusion and septic failure due to inundation. The Clallam County Shoreline Master Program (SMP) is identified as an element of the Clallam County Comprehensive Plan and is the primary regulatory authority for shoreland use pursuant to RCW 90.58. The following should be considered in developing a community and regulatory approach to addressing these changing conditions:</u></p> <ul style="list-style-type: none"> <u>(i) Suitability of the area to accommodate septic systems and potable wells in the context of changing conditions, given the potential impacts of bacterial contamination and risk of system failures.</u> <u>(ii) Increase risks to property and improvements, the commensurate increase in demand for additional protective shore armoring, and the cumulative impacts such armoring will have on adjacent properties and the nearshore environment, including impacts to designated critical habitat for species listed under the Endangered Species Act.</u> <u>(iii) Pursue broad public outreach with the intent of educating area residents on the risks associated with shoreline occupancy, problem solving, identification and execution of community-derived solutions rather than continuation of a piece-meal approach that merely reacts to individual circumstances.</u> <u>(iv) A systematic approach for identifying impacts and development of meaningful compensatory mitigation consistent with no net loss requirements under WAC 173-26-</u>
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<p>11.a) Addendum to Jamestown S'Kallam Tribe, November 19, 2025, Comments (Received 11/26/25). Agricultural resource land inventory and issues 31.02.115: Consider removing or adapting (2) bullet point three: "Preservation of valuable historic and cultural resources". Agricultural land only preserves cultural resources that are below the plow zone and other agricultural land disturbances. The act of plowing impacts significant cultural resource information by disturbing the resources from their original context and potentially removing archaeological features which can yield important information about tribal history.</p>	<p>201(2)(c) for unavoidable impacts from shore protection measures and development.</p> <p>Recommend removal of 31.02.115(2), Bullet 3: Preservation of valuable historic and cultural resources;</p>
<p>11.b) Addendum to Jamestown S'Kallam Tribe, November 19, 2025, Comments (Received 11/26/25).</p> <ul style="list-style-type: none"> Historic and cultural resources policies 31.02.3530: a. Overall, the Tribal Historic Preservation Office (THPO) believes these policies provide insufficient guidance on preservation of cultural resources. THPO recommends the removal of Policy 1 and 2. b. THPO recommends adding Policies 1, 2, and 3 from the Clallam County Shoreline 	<p>Recommend removal of 31.02.350(1) and (2)(b): (1) "Policy 1. All jurisdictions should work individually and cooperatively to identify, record, study and encourage the preservation, maintenance and use of lands, sites, and structures that have historical and archaeological significance. The early identification and resolution of conflicts between preservation of historical or archaeological resources and competing land uses should be promoted and facilitated."</p> <p>(2)(b) "Cooperatively plan, implement, and maintain corridor management plans for all proposed and existing Washington State Scenic and Recreational Highways (Hwy. 101 and Hwy. 112). Identify the long-term landscape character desired for scenic and recreational highways and their related cultural resources, and implement landscape</p>

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<p>Master Plan 35.25.160 listed below with the following edits: i.</p> <p>“(1) Sites and resources having known or suspected archaeological, historic, or cultural value should be protected. These sites/resources are important, nonrenewable resources and many are in danger of being damaged or lost because of ongoing development. Wherever possible, sites should be permanently preserved for scientific study and/or public observation consistent with 36 CFR 800 and Chapter 27.53 RCW. If the presence of an archaeological site is unknown then a survey should be conducted by an archaeologist. ii. (2) Proposed development on or adjacent to an identified archaeological, historic, or cultural site should be designed and operated to be compatible with continued protection of the archaeological, historic, or cultural site. iii. (3) The location of historic, cultural, and/or archaeological sites/resources should not be disclosed to the general public unless adequate provisions can be put in place to ensure long-term protection and preservation of such sites/resources.”</p> <ul style="list-style-type: none"> • THPO recommends the current 31.02.3530 Policy 3. be updated with a more extensive list of cultural resources regulations the County is required to follow including but not limited to: Clallam County 	<p>maintenace practices appropriate to ensure the resources' lasting character."</p> <p>Propose adding new subsections (b) through (d) to 31.02.350(2):</p> <p><u>“(b) Sites and resources having known archaeological, historic, or cultural value should be protected. These sites/resources are important, nonrenewable resources and many are in danger of being damaged or lost because of ongoing development. Wherever possible, known sites should be permanently preserved for scientific study and/or public observation consistent with 36 CFR 800 and Chapter 27.53 RCW. If the presence of an archaeological site is suspected, then a survey should be conducted by an archaeologist.</u></p> <p><u>(c) Proposed development on or adjacent to an identified archaeological, historic, or cultural site should be designed and operated to be compatible with continued protection of the archaeological, historic, or cultural site.</u></p> <p><u>(d) The location of historic, cultural, and/or archaeological sites/resources should not be disclosed to the general public unless adequate provisions can be put in place to ensure long-term protection and preservation of such sites/resources.”</u></p> <p>Propose amending 31.02.350(2): “Clallam County shall recognize tribal nations in adoption of the Comprehensive Plan and development regulations. Affected tribal nations shall be notified of development applications prior to action and be given the opportunity to comment on the project's impact to tribal rights, as required by the State Environmental Policy Act.”</p>
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<p>Shoreline Master Plan, Executive Order 21-02, SEPA, RCW27.53, RCW 68.60, WAC 25-48, WAC 25-46, RCW 42.56.300, RCW 27.44, RCW 68.50, etc</p>	
<p>11.c) Addendum to Jamestown S’Klallam Tribe, November 19, 2025, Comments (Received 11/26/25). Climate Change and Resiliency Goals and Policies 31.02.820 a. Goal 4. Cultural Resources & Practices i. Policy 4.2: Recommend the following additions: Work with local Tribes to co-manage and protect archaeological and sacred sites, cultural properties, ecosystems, traditional foods, plants, sacred sites and cultural properties from and resources from climate-related threats...”</p>	<p>Propose amending 31.02.820(4)(b): “Policy 4.2: Work with local Tribes to co-manage and protect <u>archaeological and sacred sites</u>, and cultural properties <u>ecosystems, traditional foods, plants and resources</u> from climate-related threats...”</p> <p>[Change rejected by Planning Commission, 1/7/2026.]</p>
<p>11.d) Addendum to Jamestown S’Klallam Tribe, November 19, 2025, Comments (Received 11/26/25). Sequim-Dungeness Regional Plan: a. Rural land – Inventory analysis 31.03.260 (8) Historic and Cultural Resources: i. Recommend including the terms tribal cultural resources, sacred sites, and traditional cultural places in the list of resources of significance</p>	<p>Recommend amending 31.03.260(8): “<i>Historical and Cultural Resources</i>. The Sequim-Dungeness regional planning area has plentiful historical and cultural resources. Resources of significance include <u>tribal cultural resources, sacred sites, and traditional cultural places</u>, the Dungeness School, John Hyer Farm, Blue Mountain School, Emery Farmstead, Dungeness River Bridge, Manis Mastodon Site, McAlmond House, U.S. Quarantine Station Surgeon’s Residence, New Dungeness Light Station, New Dungeness, Graveyard Spit, Gierin Farmstead, Port Williams, and Washington Harbor.”</p>
<p>12) Email from John Worthington (received 12/03/2025). Comments included:</p>	<p>No policy recommendation.</p> <ul style="list-style-type: none"> Agreed that policy language should be clearly articulated.

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<ul style="list-style-type: none"> • Urging concise and clear language in the Comprehensive Plan. • Concerning environmental conservation, urged use of “measurable, evidence-based policy.” • Provided specific inference to utilizing 3% grades for protecting salmon spawning habitat, identifying the same was established for the Jimmycomelately Creek project that proved successful. • Urged referencing the Jimmycomelately project to provide historical context for strategies that have proven effective in salmon recovery. • Specifically requesting that “Jimmycomelately science should be written into the Clallam County Comp Plan, because the GMA requires BAS.” 	<ul style="list-style-type: none"> • Included several changes implementing/requiring Best Available Science (BAS), including: 31.02.050(7), 31.02.340(1)(a) & (c), 31.02.810(3), and 31.02.820(13(a)). • Depending on the species, salmon are able to spawn in a wide range of stream gradients. Further, salmon restoration includes consideration of water quality throughout the stream system drainage/watershed, including multiple factors such as riparian stability, shade, needle and wood recruitment, etc. Jimmycomelately was successful because the team was able to match action steps to specific system needs. While some components are transferable to other systems and watershed, not all are or in the same measure applied. • The Comprehensive Plan requires application of BAS in the recovery of salmonids. Although successful given the conditions of Jimmycomelately Creek, it would not be appropriate to apply a one-size-fits-all approach. It would certainly NOT meet BAS.
<p>13) Email from John Worthington (received 12/04/2025). Testimony included:</p> <ul style="list-style-type: none"> • Estimate of economic impact of failure to provide salmon restoration. • Description of the “fixed meandering coil” design that was used for restoring Jimmycomelately Creek, with design elements. • Explanation that the same design elements should be applied to the Dungeness, Elwha and Tumwater Rivers. • Inclusion of an aerial map of the Jimmycomelately project showing former and reconstructed channel, with request 	<p>No policy recommendation.</p> <ul style="list-style-type: none"> • The economic impacts of anadromous fish losses widely known. Because continuation of species is theoretically indefinite, the actual financial benefit is unknown or could accurately be described as infinite. • The “meandering coil” or constructed channel meanders worked well in Jimmycomelately creek. However, the volume and energy gradients present in the Elwha and Dungeness rivers suggests that a fixed-meander approach detailed in the aerial maps would not be successful.

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<p>that the map be included in the Comprehensive Plan.</p> <ul style="list-style-type: none"> Proposed design elements for the three river systems identified. Assertion that the Dungeness is not being managed as Jimmycomelately Creek has been. Request to the BOCC that funding for the Dungeness Off-Channel Reservoir Project be halted until the river is modified to slow velocities using the same “fixed meandering coils” used on Jimmycomelately Creek. A series of four aerial photos of reaches of the Dungeness along with proposed locations for the “fixed meandering coils.” 	<ul style="list-style-type: none"> As noted earlier, each system has its own specific needs regarding restoration, and should be tailored accordingly. Most of the same people involved in the Jimmycomelately project are also involved in the restoration of the Dungeness River. The slowing of river velocities on the Dungeness would involve reopening the floodplain to allow for volume and energy dissipation as it existed prior to settlement. The main problem is people live there. The Off-Channel Reservoir Project would provide supplemental irrigation water during low-flow periods, which addresses one of the key problems facing the Dungeness. As noted, such improvements within the Dungeness system would likely not work, give the increased volumes and energy. Constructed log jams do achieve the same energy-reducing effect and is being applied throughout the river system.
<p>14) Postcard testimony received from Eva Young & Family, received 12/8/25. Supports adoption of policies for the protection of nighttime sky from the impacts of glare, consistent with recommendations from DarkSky Olympic Peninsula (see Public Comment, # 44).</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>15) Postcard testimony received from Pamela Ziemann, received 12/8/25. Same as #14, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>
<p>16) Second postcard testimony received from Eva Young & Family, received 12/8/25. Same as #14, above.</p>	<p>Changes already included under CCC 31.02.340(11)(b).</p>

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<p>17) Additional email testimony received from Luke Strong-Cvetich, Jamestown S’Klallam Tribe (received 12/9/25). Testimony included:</p> <ul style="list-style-type: none"> • Requests that the data under Figure 9, 2024 County Profile reflects Reservation and Trust land area of two square miles, and concerns over the accuracy of the population estimate for the same. • Requests that 31.03.435 be amended to “replace ‘overpass’ with multimodal safety improvements’ to reflect current Tribal discussions with WSDOT. 	<p>Recommend amending Figure 9 (Table) to reflect Jamestown S’Klallam Tribal Reservation & Trust land area of two acres, and incorporating a foot note concerning the accuracy of the census data regarding Tribal Trust and Reservation lands.</p> <p>Recommend amending 31.03.435(5): “<i>Transportation (Policy 5)</i>. Impacts to Highway 101 from development in Blyn must be mitigated. Improvements to intersections of County roads and Highway 101 will be required for new development which increases traffic congestion. An everpass Multimodal safety improvements on Highway 101 should be considered if traffic congestion caused by development of the casino impacts the regional mobility of the highway.”</p>
<p>18) Testimony received from Andy Sallee, Sequim Valley Airport, dated 12/2/2025. Testimony mirrored public comments received in January concerning expanding allowed uses within Airport Overlay District for Sequim Valley Airport. Recent comments requested allowing “short term cabin rentals, overnight camping, restaurant and food facilities.”</p>	<p>Under Public Comment #38, amending language was recommended for 31.03.340(8)(d), to allow consideration of “...vacation rentals and other limited lodging services” for Zone 3 of the Airport Overlay. Zone 3 of the Airport Overlay includes approximately 20 acres, of which about five has been developed with aviation-related buildings a taxiways. This leaves a substantial area that could be developed to whatever extent is allowed by Zoning. If “cabin rentals, overnight camping, restaurants and food facilities” were allowed outright and without limitations, the site could evolve into a resort destination. However, appropriately scaled, subordinate support businesses, such as a (one) small restaurant and incidental rental dwellings, could assist with the economic viability of the airport without introducing significant objectionable activities or characteristics. The details should be developed as part of a future (2026) update to the Zoning Code.</p> <p>For this purpose and for discussion, Staff proposes the following edits to 31.03.340(8)(d): “The County shall ensure the continued viability of the Sequim Valley Airport, including assurance that adjacent land uses do not cause conflicts with the continued use and maintenance of the</p>

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[change approved by PC, 1/17/2026.]	
19) Post card with hand-written testimony, received from the Mattheiss Family, dated 12/10/2025. Same as #14, above.	airport. <u>This may include exploring the feasibility of expanding allowed uses within the Airport Development (Zone 3) portion of the Airport Land Use Compatibility Overlay to include vacation rentals or other limited lodging services, small-scale restaurants at a scale commensurate and subordinate to the airport, and other limited commercial services designed and limited to serve aviation uses and traveling customers.</u> ”
20) Post card with hand-written testimony, received from Martha Rudersdorf, dated 12/10/2025. Same as #14, above.	Changes already included under CCC 31.02.340(11)(b).
21) Emailed testimony received from John Worthington, 12/16/2025. Original email also included emailed testimony from #13, above and appears to continue that discussion. Testimony included: <ul style="list-style-type: none"> • Testimony advocates for use of BPA power utility easements for co-locating pipelines or aqueducts. • Advocates that an aqueduct system transferring water from high-volume watersheds to low-volume would be preferable to the off-channel reservoir on the Dungeness River. 	No specific policy recommendations is proposed. No change is recommended.
22) Letter of Testimony from Clallam County Marine Resources Committee, LaTrisha Suggs, Chair, dated 12/17/2025. Testimony was in two parts; second part included	

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<p>specific recommendations for test edits to the CP, which included:</p> <p>31.02.340 “Environment and open space policies”</p> <ul style="list-style-type: none"> • (1)(c) Policy 3. The Critical Areas Ordinance and the Shoreline Master Program shall be utilized by Clallam County to help achieve environmental objectives, prevent environmental degradation, and to manage land use activities within the natural and intrinsic constraints of the landscape and shoreline. The ordinances shall be amended as necessary to implement watershed or special area studies and to maintain consistency with the Comprehensive Plan. Practices under this chapter should be evaluated periodically <u>regularly (at least every two years)</u> to ensure regulatory effectiveness in achieving stated objectives and fair notification to affected property owners. • (d) Policy 4. Education and incentives should be provided to the public <u>on a regular basis</u> to ensure their understanding of the principles behind regulatory protection and to increase support for protection outside of the regulatory framework. <p>31.02.340 “Environment and open space policies” (6) Marine Resources.</p>	<p>Recommend not adopting change. Two-year periodic review is far too frequent. DCD does not have the resources to keep pace with such a schedule, especially with other mandates required by law.</p> <p>Recommend not adopting change. The scope of DCD’s duties are wide and varied. Public outreach is achieved when opportunities are available and resources, such as grant opportunities, become present. Obligating the Department to regular efforts in this regard is over-committing.</p>
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<ul style="list-style-type: none"> • (a) Policy 16. Clallam County should <u>shall</u> work to <u>avoid</u> achieve alternatives for sewage treatment plant discharges to marine waters <u>(unless they achieve tertiary treatment) for and new or failing on-site septic systems subject to storm surge or sea level rise.</u> • (b) Policy 17. Clallam County shall preserve the scenic, aesthetic and ecological qualities of the marine shorelines of Clallam County, in harmony with those uses which are deemed essential to the life of its residents, <u>human and otherwise.</u> Clallam County shall implement marine resource goals through the Clallam County Shoreline Master Program and/or critical areas ordinance, as now or hereafter amended. <p>31.02.340 “Environment and Open Space Policies” (7) Habitat.</p> <ul style="list-style-type: none"> • (a) Policy 18. Land use practices should protect and enhance habitat corridors, diversity and richness, and ensure protection of wildlife corridors and habitat for threatened and endangered species. Wildlife corridors and riparian areas, <u>including marine shorelines,</u> should be maintained as important community infrastructure. • (b) Policy 19. Clallam County should protect, maintain and enhance fish and shellfish spawning, rearing, and migration 	<p>Changes already proposed to subsection (6)(a) per comments from Washington Department of Fish & Wildlife, per Testimony 4.k, above.</p> <p>Recommend adopting policy change. Protection of animal species is an integral part of “no net loss” and appropriately aligns the policy objective.</p> <p>Recommend adopting policy change. Marine shorelines are a key and distinguishable part of the natural landscape that offers habitat richness for all species, including threatened and endangered species.</p> <p>Recommend adopting policy change with an additional edit: suggest using “Damaged and degraded <u>upland, riparian and marine shoreline</u> habitat...” The distinction of including upland and marine shorelines</p>
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<p>habitat, and work to ensure harvestability of fish and shellfish. Damaged and degraded <u>upland and marine shoreline</u> habitat should be identified, prioritized and restored. Recognize the various levels of government which have a vested interest in protection, maintenance and restoration of habitat.</p> <ul style="list-style-type: none"> • (c) Policy 20. Clallam County shall recognize the large number of salmon and steelhead stocks, <u>forage fish, and shorebird nesting areas</u>, that have been classified as critical or depressed. The County shall work toward prevention of these <u>steaks-species</u> from being listed as threatened and endangered through habitat restoration and land use practices which cause no further degradation to habitat needs. 	<p>could potentially leave out riparian habitats. Including it makes the policy complete and effective.</p> <p>Recommend adopting policy change. Although anadromous fish species are priorities, all species that are critical or depressed are priority species of concern and should be protected.</p>
<ul style="list-style-type: none"> • 31.02.340 “Environment and Open Space Policies” (8) Runoff and Erosion. (Policy 21) Stormwater quality and quantity should be managed to protect shellfish beds, fish habitat, and other resources; <u>to protect the integrity of coastal bluffs</u>; to prevent the contamination of sediments from urban runoff and combined sewer overflows; and to achieve standards for water and sediment quality by reducing and eventually eliminating harm from pollutant discharges from stormwater and 	<p>Recommend adopting policy change. Emphasis on coastal bluffs is critical to near-shore processes. Protecting marine bluffs from accelerated erosion caused by uncontrolled stormwater discharges is important in protecting natural processes.</p>

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<p>combined sewer overflows. This goal should be achieved through a variety of means including:</p> <ul style="list-style-type: none"> • <u>Protection of coastal bluffs and bluff vegetation by preventing unmanaged drainage:</u> 	<p>Recommend adopting policy change per rationale above.</p>
<p>31.02.340 “Environment and Open Space Policies” (9) Floodplains and Marine Shorelines:</p> <ul style="list-style-type: none"> • (a) Policy 22. Flood control should be undertaken in the context of varied uses including agricultural and residential, fish and wildlife habitat, water supply, open space, and recreation. Land use and related regulations and zoning should reflect the natural constraints of floodplains, meander zones, and riparian habitat zones <u>including estuaries and marine shorelines subject to sea level rise.</u> Flood control measures should reserve to the fullest extent possible opportunities for other uses, including public access. • (b) Policy 23. Flood control should be undertaken in the context of an ongoing, systematic and comprehensive approach to basin management and preservation, <u>and for marine shoreline reaches subject to storm surge or sea level rise.</u> Changes in land use should try to restore the natural character of rivers, <u>and streams, estuaries and marine shorelines whenever</u> 	<p>Recommend not adopting this change. Some changes are noted as more appropriately located under Subsection (6), <i>Marine Resources</i>.</p>
	<p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>reasonably possible. Public understanding of the various uses and limitations associated with flood control should be improved through a variety of educational efforts <u>implemented on a regular basis</u>. A stable, adequate, and publicly acceptable long-term source of financing should be established and maintained for comprehensive basin management and <u>for comprehensive shoreline reach management</u>.</p> <ul style="list-style-type: none"> • (c) Policy 24. To limit potential for infrastructure damage from major and minor flood events, low intensity land use activities including <u>agricultural and recreational land uses in riverine floodplain areas and marine shorelines</u> should be encouraged, and other land uses in these areas discouraged. The need for emergency measures should be reduced or prevented through planning, structural, and nonstructural measures <u>with a strong preference for nonstructural habitat restoration measures</u>. • (d) Policy 25. To protect riverine habitat from flood damage and recognize upstream and downstream effects from flood management activities, Clallam County should require best management practices for maintaining natural river channel configurations <u>during dredging and gravel removal</u>. Nonstructural measures are preferred over structural 	<p>Recommend not adopting change. The scope of DCD's duties are wide and varied. Public outreach is achieved when opportunities are available and resources, such as grant opportunities, become present. Obligating the Department to regular efforts in this regard is over-committing.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend not adopting this change. Agriculture remains a low-intensity land use.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend not adopting this change. Other environments could potentially be impacted, not just "riverine."</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p>
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CPU Policy Response Table 3: Public/Agency Testimony

<p>measures, but, when structural methods are necessary, they shall not obstruct fish passage. Structural flood control measures should <u>shall</u> preserve or enhance existing flow characteristics for fisheries, irrigation, and other river uses. Flood control activities should <u>develop or improve</u> diversity of habitat for fish and <u>wildlife</u>, and at minimum not result <u>result</u> in <u>no net loss</u> to fish and wildlife resources, but wherever possible develop or improve <u>develop or improve</u> diversity of habitat for these resources. <u>To</u> protect marine shoreline habitat from flood damage and recognize up- and down-current effects from flood management activities, Clallam County should <u>require</u> best management practices for <u>maintaining</u> natural shoreline configurations. Nonstructural measures are preferred over structural measures, but, when structural methods are necessary, they shall not obstruct fish passage. Structural flood control measures shall preserve or enhance existing beach and current flow-cell patterns. Flood control activities should develop or improve diversity of habitat for fish and wildlife resources, and at minimum result in <u>no net loss</u>.</p>	<p>Recommend not adopting this change. Use of "shall" is legally ambiguous. "Should" provides sufficient guidance.</p> <p>Recommend adopting this change as it better reflects current state mandates concerning "no-net loss."</p> <p>Recommend adoption of this change as CCC 31.02.340(6)(d), as it is more appropriately located under "Marine Resources." The tenants of this change comport with no-net-loss policy.</p>
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31.02.340 "Environment and Open Space Policies" (12) Nonpoint Source Pollution.

CPU Policy Response Table 3: Public/Agency Testimony

<ul style="list-style-type: none"> • Policy 30. Water resources shall be maintained in the highest quality and quantity to support recognized beneficial uses. To achieve this in the most efficient and cost-effective manner, water resource and waste management planning should be coordinated on a watershed basis across jurisdictional boundaries, and <u>consider marine waters of Clallam County.</u> The County should recognize and control the downstream and cumulative effects of individual practices on water resources. Education and incentives should be used as methods to prevent nonpoint source pollution. 	<p>Recommend adopting policy change. In this context, policy is appropriate.</p>
<p>31.02.820 "Climate Change and Resiliency Goals and Policies."</p> <ul style="list-style-type: none"> • (7) Goal 7. Ecosystems. (a) Policy 7.1: Prepare ecosystems for climate impacts by implementing restoration actions for streams, wetlands, <u>shorelines,</u> and watersheds, focusing on connectivity, reducing invasive species, and improving watershed processes. This includes restoring riparian vegetation, floodplains, and stream structures to protect native fish and other aquatic life. Enhance habitat and community resilience to climate change by protecting and restoring <u>marine flora and fauna</u> and coastal ecosystems, addressing sea-level rise, and focusing on submerged aquatic vegetation for habitat 	<p>Recommend adopting policy change. In this context, policy is appropriate.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>and “blue” carbon storage. Evaluate <u>and implement</u> shoreline restoration and cleanup efforts, including concerns for Tribal cultural resources.</p> <ul style="list-style-type: none"> • (8) Goal 8. Emergency Management. Promote and implement communication, transportation response, and education on preparedness and recovery efforts to ensure that all members of the Clallam County community are ready for climate emergencies, <u>both gradual (such as sea level rise or drought frequency) and catastrophic (such as storm surge or wildfire)</u>. Anticipate and be ready to accommodate the rise in demand for <u>short- and long-term</u> emergency services due to climate change impacts and understand community and <u>individual neighborhood</u> needs when preparing for emergency situations. 	<p>Recommend adopting policy change. In this context, policy is appropriate.</p>
<ul style="list-style-type: none"> • <i>The MRC recommends that the County provide notice and disclosure to current, future and prospective purchasers of properties with designated critical areas or shorelines of potential hazards and nuisances and the potential for land use regulations.</i> 	<p>Recommend no policy change. Notice to Title is required for all permits issued within 200-feet of a wetland (27.12.215(9)), stream corridor (37.12.315(11)), landslide hazard (27.12.415(5)) or frequently flooded area (27.12.520(5)). Regulations concerning shorelines are administered under the Shoreline Management Act (RCW 90.58) and are not a part of the CPU process.</p>
<p>31.02.250 [As amended] Master planned resorts land use policies.</p> <ul style="list-style-type: none"> • (1)(h) The master planned resort is consistent with development regulations of 	<p>Recommend not adopting policy change. Although “net gain” might be an appropriate goal, it exceeds recommendations from the Department</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>the County to protect critical areas to ensure <u>long-term net gain no net loss</u> of ecological functions and values <u>with no net loss</u>.</p> <p>31.02.340 “Environment and open space policies” (3) Wetlands.</p> <ul style="list-style-type: none"> • “Clallam County shall work to achieve <u>long-term net gain no net loss</u> of regulated wetlands’ functions and values through restoration and enhancement at the watershed scale, while allowing a reasonable use of property with no net loss, at minimum, with regard to their functions and values; in the short-term and should work to achieve a long-term net gain in these attributes through restoration and enhancement.” 	<p>of Fish & Wildlife for project-level consideration. As originally amended, the section is compliant.</p> <p>Recommend adopting policy change with the recommendation that “...in the short term” be removed. The policy changes does not obligate the County to achieve net gain at the project level, but makes it an overall (aspirational) objective. Requiring “no net loss” is a requirement of the GMA.</p>
<p>31.02.820 “Climate Change and Resiliency Goals and Policies” (7) Ecosystems.</p> <ul style="list-style-type: none"> • (b) Policy 7.2. Strengthen habitat and ecosystem resilience by inventorying and avoiding development in climate refugia and critical habitats with a focus on <u>achieving net ecological gains of ecosystem attributes, while to striving for no net loss, at minimum, of ecosystem attributes, with a focus on achieving net ecological gains</u>. Expand habitat protection, quality, and connectivity through designations such as conservation areas, expanded <u>critical area</u> 	<p>Recommend adopting policy change with the recommendation that “...critical area and all other...” be removed. Expanded buffers is sufficient to communicate the intent of this section; “all other” is open-ended and could imply (such as shorelines) buffers which are beyond the statutory authority of the GMA.</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p><u>and all other buffers, greenbelts, wildlife and open space bridges and corridors. Incorporate climate considerations in determining permissible activities within wetlands and wildlife habitats.</u></p> <p>31.02.340 “Environment and Open Space Policies” (15) <u>Oil and other Hazardous Materials</u> Processing and Transmission.</p> <ul style="list-style-type: none"> • Policy 40. The coastline, coastal waters, and upland areas should be protected from the recognized problems and depreciation which could be brought about by <u>oil or crude transport</u> and oil ports and development associated with an oil port, oil storage, oil or crude transport, and oil pipelines. Other industries with high energy and water requirements, a high pollution component, or which are incompatible with existing industries shall not be permitted. This includes, but is not limited to, oil ports and their associated developments, crude petroleum transfer facilities, tank farms and refineries, liquid natural gas transfer facilities, petrochemical plants and nuclear power and processing plants, <u>and facilities processing any hazardous material known or proven to be hazardous.</u> <p>31.02.420 “Transportation – Goals and Policies”</p>	<p>Recommend adopting policy recommendation. Although direct authority to govern commercial maritime traffic is not vested in the County, such policy statement could provide the BOCC opportunity to request inclusion in policy and regulatory program development.</p>
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CPU Policy Response Table 3: Public/Agency Testimony

<ul style="list-style-type: none"> • Roads and Highways. (k) Policy 11. Protect wildlife habitat and prevent watershed degradation, where possible, through: <ul style="list-style-type: none"> (iii) New transportation arterials and major collectors which have the potential to transport hazardous materials should not be planned parallel to and in close proximity to <u>marine or riverine shorelines</u>. Transportation facilities should <u>shall</u> minimize the potential impact of accidental spillage of hazardous materials into any waterway. • (2) Marine Transportation. [NEW – language based on similar policy under Roads and Highways] (c) Policy <u> </u>. <u>Protect wildlife habitat and prevent marine water quality degradation, where possible, through:</u> <ul style="list-style-type: none"> (i) <u>Due to increases in tanker, barge, container ship and cruise ship traffic, the County should advocate that expansion of marine transportation should enhance and/or restore fish and wildlife habitat.</u> (ii) <u>Marine transportation facilities should minimize the potential impact of accidental spillage of hazardous materials into any waterway.</u> (iii) <u>Bridges and other transportation facilities should not constrict the natural and dynamic condition of marine shorelines and estuaries.</u> 	<p>Recommend not adopting policy change. Lakes, ponds and other “shoreline” features could be omitted. Also, “shall” is legally ambiguous; “should” provides adequate guidance.</p> <p>Recommend adopting policy change. In this context, policy is appropriate.</p>
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CPU Policy Response Table 3: Public/Agency Testimony

<p>(iv) <u>Design road geometrics and drainage to intercept or minimize the transport of roadway sanding materials from entering marine shorelines.</u></p> <p>(v) <u>Tug boat escorts are needed in more areas; home-porting is recommended for Port Angeles Harbor.</u></p> <p>(vi) <u>Ensure local spill response coordination through emergency response planning and execution, including practice exercises and training. Consult the “Strait of Juan de Fuca Geographic Response Plan” (2024) for oil spills regarding protection of sensitive marine life in each geographic area.</u></p> <p>(vii) <u>Advocate at the state level for maintaining or increasing agency spill responders in Clallam County.</u></p>	
<p>Online testimony submittal, received from Sarah Huling, dated 12/17/2025.</p> <ul style="list-style-type: none"> • Jason and I support Clallam County’s Comprehensive Plan update and the County’s obligation to comply with the Growth Management Act (RCW 36.70A). Our comment is focused on implementation clarity, particularly as residential densities are increased within Urban Growth Areas. • We request that the plan clearly reaffirm concurrency, stating that the development capacity identified in the Land Use and 	<p>Concern regarding concurrency is addressed under amended 31.02.320(6) and 31.02.420(7). No further policy change is necessary.</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>Housing Elements is contingent upon adopted levels of service and funded, scheduled infrastructure improvements in the Capital Facilities Plan.</p> <ul style="list-style-type: none"> As zoning capacity increases, it is important that the plan clearly distinguish between mandatory GMA requirements and provisions that depend on infrastructure capacity, so future development regulations do not rely on unfunded assumptions. With these clarifications, the plan will provide a more predictable and defensible framework for zoning decisions while continuing to meet statutory housing requirements. 	<p>As noted in 31.02.425 and Appendices I and L, growth impacts were considered with respect to facility capacities and projected growth. No further policy change is necessary.</p> <p>Agreed. No policy edits necessary.</p>
<p>24) Email from John Worthington, received 12/20/2025.</p> <ul style="list-style-type: none"> Testimony advocates for boring projects and creek diversions to install aqueducts for supplementing stream corridors with additional flows from systems that have an abundance of water, as an alternative to off-channel reservoir projects. 	<p>No policy change is recommended. The Department of Ecology has a strong policy against diverting water resources from one watershed to another. The costs, by the author's admission, are far more substantial than the water retention projects (off-channel reservoir, active aquifer recharge) being undertaken within the watershed. It also ignores the impacts of reducing water flows from one system in order to benefit another.</p>
<p>25) Letter from Hoh Indian Tribe, dated 01/05/2026.</p> <ul style="list-style-type: none"> 31.02.170 Designation of Mineral Resource Land. As the plan states, "environmental impacts of mineral 	<p>The concerns expressed are legitimate and policy that ensures adequate notice under SEPA review is appropriate. Suggest amending 31.02.170(1)(e): "The review of an application for a MRL or MRL0D</p>

CPU Policy Response Table 3: Public/Agency Testimony

<p>extraction can be substantial". That level of ground disturbance can also have negative impacts on Tribal cultural assets and areas. If the County undertakes any actions that could potentially affect Tribal cultural resources, including analyzing whether resources are present in a SEPA process, the Hoh Tribal Chairperson and Tribal Historic Preservation Officer should be notified. We'd like to see Tribal consultation required and mentioned in the Comprehensive Plan so that our jurisdictions can work together and ensure valuable resources are not harmed.</p> <ul style="list-style-type: none"> <p>31.02.282 Affordable housing issues, & 31.02.283 Affordable housing policies. Developing more affordable housing in Forks and the surrounding area is a priority for Hoh Tribal members. The supply of affordable housing in the County does not currently meet demand. This affects both Tribal citizens and the Tribe's ability to attract and retain staff members. We appreciate the variety of housing policies and hope they will lead to a larger housing supply of varied types and affordability levels in Forks, the Three Rivers area, and Beaver.</p> <p>31.02.340 Environment and open space policies. The Hoh Tribe is deeply invested in environmental protection and conservation. We run a robust Natural Resources Department dedicated to</p> 	<p>designation will include a site-specific SEPA checklist and threshold determination. <u>Tribes with Usual and Accustomed Areas within or adjacent to the site shall be provided notice of the application and consulted to ensure Tribal cultural assets are not impacted, as part of the SEPA review process...</u>"</p> <p>No policy recommendation. Several of the policies intended to support affordable housing should have a positive impact to address the concerns expressed.</p>
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CPU Policy Response Table 3: Public/Agency Testimony

<p>monitoring, restoration, and careful stewardship. We support many of the environmental policies within the Comprehensive Plan, but there are several areas in which these regulations could be strengthened to better protect our joint area's character and abundance:</p> <p>➤ Wetlands in WA have been overwhelmingly developed, which is deeply troubling, given their ecological importance. Right now, Policy 9 in 31.02.340 (3) calls for no net loss of wetlands. 2 While no net loss has previously been standard practice, we are seeing wetlands continue to disappear. This policy is not protecting our ecosystems. 3 It's time for bolder action. We encourage exploration and development of the "net ecological gain" or "NEG" concept in place of "no net loss".</p> <p>➤ The general goals of the Habitat section in the Plan align with our own, including protecting habitat, restoring degraded fish habitat, etc. However, we'd like to see more specifics that will make environmental protections more concrete. Many of the policies contain the word "should" and are framed as goals rather than as strict requirements for development that could protect the environment.</p> <p>➤ The Environment section does not discuss required riparian buffers. While the Forest</p>	<p>Per testimony received from the MRC, changes have already been proposed in this regard (see Testimony #22, p. 30).</p> <p>The use of "should" within the Comprehensive Plan and at the policy level is appropriate. The regulation (Critical Areas Code, Shoreline Master Program) is where more definitive and "concrete" language is appropriate.</p> <p>Riparian buffers and buffers for wetlands and landslide hazard areas are established within the regulation (Critical Areas Ordinance, Shoreline</p>
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CPU Policy Response Table 3: Public/Agency Testimony

<p>Land Use section does discuss implementing best management practices as defined by the Forest Practices Act, we also advocate for establishing riparian buffers for all other types of land use as well. The County should consider policy language that adopts stream and river buffers the width of one 200-year site-potential tree height (SPTH) measured from the edge of the active channel or active floodplain, consistent with Washington Department of Fish and Wildlife Riparian Ecosystems guidance.⁴ Current buffers averaging 50-150 feet significantly under-protect riparian functions compared to optimal 200+ foot widths for large coniferous systems essential to salmon habitat. Whether addressed in the Comprehensive Plan policies or the Critical Areas Ordinance implementation regulations, these enhanced buffer standards are essential.</p> <ul style="list-style-type: none"> 31.02.350 Historic and cultural resources policies. Consultation and notification prior to any action that may affect Tribal lands and/or resources is always the best policy. For this reason, we support 31.02.350 Policy 3. However, this should be expanded beyond development applications to consultation before changing zoning regulations and before any activity that will involve ground disturbance. 	<p>Master Program). The comments are correct regarding use of the site-potential tree height (SPTH) as a standard under best available science for riparian buffers. The CPU's BAS Report and GAP Analysis both reflect this need. These documents form the basis of changes that will be made to the Critical Areas Ordinance within 12 months of adoption of the CPU, and again in the Shoreline Master Program during its update.</p> <p>Recommend amending 31.02.350(2): "Clallam County shall recognize tribal nations in adoption of the Comprehensive Plan and development regulations. Affected tribal nations shall be notified of development applications <u>or changes in development regulations</u> prior to action and be given the opportunity to comment on the project's impact to tribal rights, as required by the State Environmental Policy Act, the Clallam County Shoreline Master Plan, Executive Order 21-02, SEPA, RCW27.53, RCW 68-60, WAC 25-48, WAC 25-46, RCW 42.56.300, RCW 27.44, RCW 68.50, etc."</p>
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CPU Policy Response Table 3: Public/Agency Testimony

<ul style="list-style-type: none"> • 31.02.420 Transportation – Goals and Policies. Many Tribal members depend on public transportation around the Olympic Peninsula, including routes and connectors through Jefferson and Clallam County. In surveys we conducted about the Comprehensive Plan process, increased transportation around the Olympic Peninsula was a high priority. As Forks grows, we recommend including increased funding and support for the public bus routes that travel to Forks. • 31.02.720 Utility policies. Clallam PUD is the service provider for the Hoh Indian Reservation. Due to its remote location, power outages are frequent on the Reservation. Demand for power on the Olympic Peninsula is likely to increase as more people move to the area, more people drive electric vehicles, and summer temperatures continue to rise. Electricity is central to keeping Tribal members healthy. The Comprehensive Plan can address these future issues by prioritizing upgrades to existing infrastructure and development of additional lines. • Emergency Management. The Hoh Indian Tribe would like to continue to work with both Clallam and Jefferson Counties to strengthen our emergency response abilities. Due to the remote nature of the Hoh Indian Reservation and the complexity of insurance jurisdictions, 	<p>Propose new section 31.02.420(3)(e): <u>"As the City of Forks and vicinity develops, support and encourage the commensurate expansion of transit service between Forks and the rest of the Olympic Peninsula."</u></p> <p>New policy 31.02.720(6) could be expanded: "(6) Policy 6. Power and utility service providers should be encouraged to integrate resiliency and redundancy in utility service extension design, where practicable, in order to avoid service outage, disruption, and duration. <u>The PUD should be encouraged to equitably prioritize upgrades to existing infrastructure and development of service line redundancy in communities at higher risk of climate impacts, such as the west end of the County and beyond within the district's service boundary.</u>"</p> <p>The Hoh Indian Tribe has been included in the Climate Vulnerability Assessment (Exhibit K), setting the foundation for future collaboration and emergency response improvements.</p>
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CPU Policy Response Table 3: Public/Agency Testimony

<p>among other things, it is difficult to get adequate and timely emergency services on the Hoh Indian Reservation. The Tribe has had to watch buildings burn down because there is no structural fire response on the Reservation. While the Reservation lies in Jefferson County, the proximity of Forks means that Clallam County assets are often physically closer. Whether through the Comprehensive Plan, the Hazard Mitigation Plan, or other efforts, we would like to continue to work with both Counties and the City of Forks to find multi-jurisdictional solutions that keep everyone safe.</p>	

CPU Policy Response Table 4: Commerce Checklist

Clallam County Comprehensive Plan Update Commerce Checklist, Items still requiring policy revisions

The following items are included in the Commerce Checklist prepared by Facet Consulting for Clallam County's Comprehensive Plan Update. The Checklist identifies specific requirements of the GMA and whether those requirements are, or have been, included in the CPU. The items below represent those requirements that still require changes.

Requirement	Policy for Amendment/New Policy
<p>1) Section 1, p. 7, Compliance with RCW 36.70A.177(3), allowance of ag accessory uses while ensuring they do not . Policies limiting ag accessory uses.</p>	<p>NOTE: Ch. 33.48 already implements standards per 36.70A.177(3). Recommend new policy Section 31.02.115(3)(c): "<u>Agricultural Accessory Uses. Clallam County supports the inclusion of agricultural accessory uses that assist local farms to maintain profitability and sustainability. 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. 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 to nonagricultural uses, and shall be focused on the least agriculturally productive portion of the property.</u>"</p>
<p>2) Section 1, p. 9, inclusion of "Best Available Science" for the protection of critical areas.</p>	<p>Recommend amendment to 31.02.340(1)(a): "Best conventional technology <u>available science</u> shall be used to prevent or treat the environmental impacts of conventional pollutants." Recommend amendment to second sentence 31.02.340(1)(c): "The ordinances shall be amended as necessary to implement watershed or</p>

CPU Policy Response Table 4: Commerce Checklist

	<p>special area studies, <u>maintain consistency with best available science (BAS)</u>, and to maintain consistency with the Comprehensive Plan.”</p>
<p>3) Section 1, p. 10. Per RCW 36.70A.142, allow for the siting of organic materials management facilities (composting) within industrial zones.</p>	<p>Recommend amending 33.17.010(1) and .020(1) to allow organic <i>materials management facilities</i>, outright.</p> <p>Recommend new definition 33.03.010(77): <u>“Organic materials management facility” means a location and related improvements where organic waste, such as food scraps, yard trimmings or other organic materials that do not contain pesticides, pests, or other forms of chemical or biological contamination, is processed into new products like compost or energy, through composting, anaerobic digestion, vermiculture, black soldier fly, or similar technologies.”</u></p>
<p>4) Housing Element, p. 11. Strengthen language that reflects requirements of RCW 36.70A.070(2)(b), regarding duplex, triplex and townhomes, and housing in proximity to employment locations. Also, additional language to incorporate requirements of .070(2)(d) regarding adequate provisions for affordable housing.</p>	<p>Recommend amending 31.02.281(1): <i>Policy 1.</i> “Urban growth areas shall be adequately sized to guard against negative market fluctuations attributed to artificially tight land supply and shall promote a variety of housing types, including multifamily, single-family, <u>duplexes, triplexes, townhomes, mixed uses, affordable housing, emergency housing, emergency shelters, permanent supportive housing, and accessory living units. Consideration should also be given to locating housing in proximity to employment centers.”</u></p> <p><u>Recommend new section 31.02.281(2): “Policy 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 segments. In addition to the efforts of the Homelessness Task Force (CCC 31.02.280(3)(c)) and the adjustments to land use designed to accommodate income segment growth targets (CCC 31.02.280(3)(a)), measures should be developed to avoid 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</u></p>

CPU Policy Response Table 4: Commerce Checklist

	<p><u>and continued monitoring should be established to evaluate and respond to avoid active displacement."</u></p>
<p>5) u. The land use element must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools and through wildfire preparedness and fire adaptation measures. RCW 36.70A.070(1) amended in 2023. See also: International Wildland-Urban Interface Code updated in 2021 and WAC 51-55 amended in 2023</p>	<p><u>Recommend new section 31.02.820(8)(f): "Policy 8.6: The 2025 Clallam County Hazard Mitigation Plan (HMP), is hereby adopted by this reference (Exhibit M). This policy is also considered part of the Land Use Element of this Comprehensive Plan.</u></p> <p><u>Recommend new section 31.02.820(13)(c): "Policy 13.3: Chapter 6 of the 2021 Washington State Wildland-Urban Interface Code, is hereby adopted by this reference. This policy is also considered part of the Land Use Element of the Comprehensive Plan.</u></p>
<p>6) g. (p. 16) Identification of areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments. RCW 36.70A.070(2)(g) new in 2021 Establish anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing. RCW 36.70A.070(2)(h) new in 2021. See also: Support Materials for Racially Disparate Impacts, Exclusion and Displacement Work</p>	<p>Working with Consultants to provide a recommendation.</p>

CPU Policy Response Table 4: Commerce Checklist

<p>7) Capital Facilities Plan Element, p. 14. Address the potential for displacement impacts resulting from growth following infrastructure investments.</p>	<p>Recommend new policy 31.02.320(3): <u>“Infrastructure investments and service extensions should be planned equitably and measures to address potential displacement impacts should be implemented concurrently or upon economic signals of displacement potential.”</u></p>
<p>8) e. A forecast of multimodal transportation for a minimum of 10 years including land use assumptions used in estimating travel. RCW 36.70A.070(6)(a)(i), RCW 36.70A.070 (6)(a)(iii)(E) amended in 2023, WAC 365-196- 430(2)(f)</p>	<p>[methods from KH will be provided by Facet]</p>
<p>9) Capital Facilities Plan Element, p. 15. A policy establishing the requirement to reassess the land use element if probable funding falls short of meeting existing needs and to ensure that the land use element, capital facilities plan element, and financing plan within the capital facilities plan element are coordinated and consistent.</p>	<p>Recommend amending 31.02.320(5): <u>“Policy 65. Prepare a six (6) year financial plan for any public facilities which need to be developed as a result of LOS requirements and projected changes in population. Should funds fall short of meeting existing needs, the land use element should be reassessed to ensure the Capital Facilities Plan, finance plan and land use element are coordinated and consistent. The six (6) year financial plan should be based on cost estimates for capital improvements which are identified in the plan. See Capital Facilities Plan (Appendix I) for detailed financing plan.”</u></p>
<p>10) Utilities Element, p. 15. Identify City of Port Angeles as electric purveyor withing City limits.</p>	<p>Recommend amending first sentence at top of p. 21, CFP: <u>“Clallam County’s Public Utility District (PUD) provides all electrical service to the county, with the exception of a portion of the City of Port Angeles, which is administered by City of Port Angeles Light Operations.”</u></p>
<p>11) Transportation Element, p. 17. Forecast multimodal transportation for a minimum of 10 years, including land use assumptions used in estimating travel (RCW 36.70A.070(6)(a)(iii)(E)).</p>	<p>Recommend new paragraph 3, 31.02.425: <u>“A forecast study of current and future (20-year) multimodal transportation demand was conducted for key arterial intersections within the Sequim Urban Growth Area in 2025. by Kimley-Horn Engineering Consultants. The locations were selected to anticipate future growth and related transportation because of land use changes contemplated within the Housing Element and</u></p>

CPU Policy Response Table 4: Commerce Checklist

	<p><u>Comprehensive Plan Land Use Map within the unincorporated Sequim Urban Growth Area. The study was also coordinated with growth projected from land use choices being considered by the City of Sequim. The study concluded that, with projected growth and related traffic and non-motorized transportation demand, the intersections demonstrated adequate levels of service (LOS) over the projected 20-year planning horizon (see Exhibit L). additional analysis was not completed elsewhere as the City of Sequim UGA is the only location within Clallam County that proposed density changes and any significant expectation of corresponding changes in development patterns.</u></p>
<p>12) g. A transition plan for transportation as required in Title II of ADA. Perform self-evaluations of current facilities and develop a program access plan to address deficiencies and achieve the identification of physical obstacles, establish methods, perform modifications and identify leadership roles. RCW 36.70A.070(6)(a)(iii)(G) new in 2023</p>	<p>Recommend new section 31.02.420(1)(e)(vii): <u>"In accordance with RCW 36.70A.070(6)(a)(iii)(G), the County should perform an inventory and self-evaluation of current facilities relative to accessibility requirements of the Americans with Disabilities Act of 1990 (ADA). Based on that information, the County should develop a Transition Plan to address identified deficiencies, including identification of physical obstacles that limit the accessibility of facilities to individuals with disabilities, describe the methods to be used to make the facilities accessible, provide a schedule for making the access modifications, and identify the public officials responsible for implementation of the Transition Plan."</u></p>
<p>13) h. An active transportation component to include collaborative efforts to identify and designate planned improvements for active transportation facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles. RCW 36.70A.070(6)(a)(vii) amended in 2023, WAC 365-196-430(2)(j).</p>	<p>Working with Consultants to provide a recommendation.</p>
<p>14) l. If probable funding falls short of meeting identified needs of the transportation system,</p>	<p>Recommend amending 31.02.420(6)(e): <u>"Coordinate federal, State, and private funding. The Six-Year Transportation Improvement Plan (TIP)</u></p>

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<p>including state transportation facilities, a discussion of how additional funds will be raised, or how land use assumptions will be reassessed to ensure that LOS standards will be met. RCW 36.70A.070(6)(a)(iv)(C) amended in 2023, WAC 365-196-430(2)(i)(iii).</p>	<p><u>and the County's Capital Improvement Plan (CIP) will be utilized to coordinate these funding sources and prioritize capital expenditures according to the adopted levels of service and community priorities. Where probable funding sources identified fall short of meeting the identified needs of the transportation system, including state transportation facilities, the Board of County Commissioners will consider alternative funding sources and mechanisms, including but not limited to grant opportunities, local road improvement districts (RIDs), and General Fund allocation. In the event that adequate funding sources are not available, consideration should be given to reassessing the land use assumptions and making appropriate changes to ensure that LOS standards will be met in accordance with RCW 36.70A.070(6)(a)(iv)(C)."</u></p>
<p>15) Essential Public Facilities, p. 23. Need to incorporate "reentry and rehabilitation facilities" as part of EPFs, per RCW 36.70A.200.</p>	<p>Recommend amending 31.02.050(17): "Essential public facilities:" means facilities that are typically difficult to site, such as airports, State education facilities, and State or regional transportation facilities as defined in RCW 47.06.140, State and local correctional facilities, solid waste handling facilities, <u>reentry and rehabilitation facilities</u>, opioid treatment programs including both mobile and fixed-site medication units, recovery residences, harm reduction programs excluding safe injection sites, and in-patient facilities including substance abuse facilities, mental health facilities, group homes, and secure community transition facilities as defined in RCW <u>71.09.020.</u>"</p>
<p>16) Economic Development, p. 26. Need to update population data under Economic Development Issues.</p>	<p>Recommend amending 31.02.610(1): "<u>Population. As of 202405</u>, the Forecasting Division of the Washington State Office of Financial Management (OFM) estimated Clallam County's population (including incorporated areas) at <u>78,55066,800</u>, which is approximately a <u>1.8feur</u> percent increase (<u>0.45one</u> percent annualized rate) from the Census population of <u>77,15564,179</u> in 20<u>200</u> and approximately <u>2248</u> percent increase (<u>4.20.9</u> percent annualized rate) from the Census population of <u>64,17956,464</u> in <u>20004990</u>. According to the OFM, the majority of population increase has been due to in-migration. In <u>2002-OFMUtilizing</u></p>

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	<p><u>the Department of Commerce's medium projection modelling, projections estimated that Clallam County's resident population is likely to would increase to as much as 72,38386,700 by 204510 and 81,894 by 2020.</u></p>
<p>17) a. All plan elements must be consistent with relevant county-wide planning policies (CWPPs) and, where applicable, multi-county planning policies (MPPs) and the GMA. RCW 36.70A.100 and 210, WAC 365-196-305; 400(2)(c); 510 and 520.</p>	<p>Recommend amending 31.02.100(1): "Clallam County shall work with local jurisdictions within the county to ensure relevant county-wide planning policies are integrated into the local planning process, and ensure local goals and policies are consistent.</p> <p><u>(a) The Clallam Countywide Planning Policies (CCPP) were amended on December 2, 2018.</u></p> <p><u>(b) As part of the Comprehensive Plan Update review, the CCPP were reviewed for compliance with RCW 36.70A.210 and found to be in substantial compliance with the requirements of the Act.</u></p> <p><u>(c) Representatives from the County and its municipal jurisdictions met on several occasions as part of the Comprehensive Plan update to discuss growth allocations, land use, and other elements as required throughout the CCPP.</u></p> <p><u>(d) The CCPP should be reviewed every five years to reflect local market conditions concerning urban growth area designations, urban services, capital facilities, transportation, housing market needs, economic development, tribal and cultural resources, and continued adequacy for creating a framework for coordination on growth management.</u></p>
<p>18) b. All plan elements must be consistent with each other. RCW 36.70A.070 (preamble) and WAC 365-197-040.</p>	<p>The Plans have been reviewed for internal consistency pursuant to RCW 36.70A.070. With minor adjustments, no substantive inconsistencies are known to exist.</p>
<p>19) c. The plan must be coordinated with the plans of adjacent jurisdictions. RCW 36.70A.100 and WAC 365-196-520.</p>	<p>Upon completion of Commerce 60-day review draft, notice will be provided to Jefferson County. The Climate Vulnerability Assessment was modified to incorporate the Hoh Indian Tribe (Jefferson County) as Clallam County and the City of Forks represent the closest emergency responders available.</p>

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<p>20) Zoning Code, p. 32. Per RCW 36.70A.450, the County is barred from prohibiting family daycare facilities (12 kids or less) from operating from an individuals home within residential or commercial zones. The use is allowed outright, but is conditional in the DPA zone, and prohibited in the RLC, TR, UNC and URC Zones.</p>	<p>Recommend amending Sections 33.15.035, .060, .067, .070, and .080, to list <i>Family Daycare Provider</i> as permitted outright.</p>
<p>21) Zoning Code, p. 33. Per RCW 36.70A.410, the County is barred from treating a residential structure occupied by individuals with handicaps any differently than a similar structure occupied by a family or other unrelated individuals.</p>	<p>Recommend amending Table 33.19.040(A) and Table 33.20.040(A) by removing reference to "Group homes..." which will remove treating such units differently from other residential units.</p>
<p>22) h. Limitations on regulating: outdoor encampments, safe parking efforts, indoor overnight shelters and temporary small houses on property owned or controlled by a religious organization. RCW 36.01.290 amended in 2020, RCW 35.21.915 amended in 2020.</p>	<p>Recommend new section 31.02.283(3)(m): <u>"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."</u></p>
<p>23) Resource Lands, p. 37. Pursuant to RCW 36.70A.060(1)(b), Counties are required to provide notice to permittees for activities within 500 feet of designated resource lands (Forest, agriculture, and mineral lands). CCC 29.20.300(26) requires plat notes for any subdivision within 600 feet of designated resource zoning. No notice is currently</p>	<p>Recommend new section 33.40.110: <u>"Notice of Proximity to Resource Zone.</u> <u>All building permits or other development permits issued by the Department of Community Development for activities occurring within 500 feet of lands designated as Agricultural Retention (AR), Commercial Forest (CF), Commercial Forest/Mixed Use 20 (CFM20), Commercial Forest/Mixed Use 5 (CFM5), or Mineral Resource Land Overlay, shall be</u></p>

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<p>required for building or other development permits.</p>	<p><u>provided a written notice on or accompanying the final permit that contains the following language:</u></p> <p><u>This development activity is within five hundred (500) feet of property zoned for forestry, agricultural purposes or as a designated mining site. You may be subject to inconveniences or discomforts arising from such operations, INCLUDING BUT NOT LIMITED TO NOISE, TREE REMOVAL, ODORS, INSECTS, FUMES, DUST, SMOKE, THE OPERATION OF MACHINERY OF ANY KIND DURING ANY 24 HOUR PERIOD (INCLUDING AIRCRAFT), THE STORAGE AND DISPOSAL OF MANURE, AND THE APPLICATION BY SPRAYING OR OTHERWISE OF CHEMICAL FERTILIZERS, SOIL AMENDMENTS, HERBICIDES AND PESTICIDES. Clallam County has determined that the use of real property for forestry, mining or agricultural operations is a high priority and favored use to the County and those inconveniences or discomforts arising from these operations, if such operations are consistent with commonly accepted best management practices and comply with local, State and Federal laws. However, those activities which are not related to normal forestry, mining, or agricultural operations, or which do not follow accepted best management practices, are not protected under these provisions and will be considered a nuisance."</u></p>
<p>24) e. Designate mineral lands and associated regulations as required by RCW 36.70A.131 and WAC 365-190-040(5). For more information review the WA State Dept. of Natural Resources (DNR)'s Geology Division site</p>	<p>Working with Consultants to provide a recommendation.</p>
<p>25) d. Include in short plat regulations procedures for unit lot subdivisions allowing division of a parent lot into separately owned unit lots. RCW 58.17.060(3) new in 2023 by SB 5258 - section 11</p>	<p>Working with Consultants to provide a recommendation.</p>

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<p>26) Concurrency and Transportation Demand Management, p. 43. Should strengthen language to ensure new development compensates for impacts to the transportation system, particularly of LOS drops below acceptable levels as required under RCW 36.70A.070(6)(b).</p>	<p>Recommend amending 31.02.420(7): “Mitigation. (Policy 31) Clallam County should require new development to mitigate impacts on transportation facilities which are insufficient to safely handle transportation demands. The County should <u>develop strategies to</u> require new development to rectify and/or compensate for impacts to transportation facilities not meeting minimum safety standards, <u>or when currently adopted levels of service (LOS) are diminished below acceptable levels, when reasonable and capable of being accomplished. These strategies may include active transportation facility improvements, increased or enhanced public transportation service, ride-sharing programs, demand management, and other transportation systems management strategies funded by the development.</u>”</p>
<p>27) d. Traffic demand management (TDM) requirements are consistent with the comprehensive plan. RCW 36.70A.070(6)(a)(vi) Examples may include requiring new development to be oriented towards transit streets, pedestrian-oriented site and building design, and requiring bicycle and pedestrian connections to street and trail networks. WAC 365-196-840(4) recommends adopting methodologies that analyze the transportation system from a comprehensive, multimodal perspective.</p>	<p>Working with Consultants to provide a recommendation.</p>
<p>28) b. Regulations define emergency for an emergency plan amendment. RCW 36.70A.130(2)(b) and WAC 365-196-640(4)</p>	<p>Recommend amending 31.08.300, Paragraph 1: “The purpose of this section is to establish procedures and timelines for amending the Comprehensive Plan, including text and maps, through the annual Comprehensive Plan review process, as an emergency amendment, or as a minor amendment. The Growth Management Act (Chapter 36.70A RCW) generally allows amendments to comprehensive plans,</p>

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	<p>comprehensive plan maps and associated development regulations only once per year, except in emergencies <u>as set forth under RCW 36.70A.130(2)(b)</u>, in order to allow communities to consider the cumulative impacts of the proposed revisions...”</p>
<p>29) Plan and Regulation Amendments, p. 47. Pursuant to RCW 36.70A.290(2)(b), the effective date of an amended Comprehensive Plan or development regulation must be 60-days following adoption.</p>	<p>Recommend amending 31.08.430: “Effective Date. This Plan is necessary for the preservation of the public health, safety and general welfare of the people of Clallam County, and shall take effect 45 days following adoption <u>and publication of notice of adoption</u> by the Clallam County Board of Commissioners.”</p>