

# SEPA<sup>1</sup> Environmental Checklist

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## Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

## Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. **You may use “not applicable” or “does not apply” only when you can explain why it does not apply and not when the answer is unknown.** You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

## Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

## Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in “Part B: Environmental Elements” that do not contribute meaningfully to the analysis of the proposal.

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<sup>1</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance>

## A. Background

Find help answering background questions<sup>2</sup>

1. **Name of proposed project, if applicable:** Clallam County 2025 Docket of Comprehensive Plan and Development Regulation Amendments
2. **Name of applicant:** Clallam County Department of Community Development
3. **Address and phone number of applicant and contact person:**  
Bruce Emery, Director of Clallam County Department of Community Development, 223 E 4<sup>th</sup> St, Suite 5, Port Angeles, WA 98362 [bruce.emery@clallamcountywa.gov](mailto:bruce.emery@clallamcountywa.gov)
4. **Date checklist prepared:** November/December 2025
5. **Agency requesting checklist:** Clallam County
6. **Proposed timing of schedule (including phasing, if applicable):** Planning Commission public hearing to be continued through January 2026. Recommendation will be forwarded to the County Commissioners with a final action to take place in early 2026.
7. **Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.** Changes to the Comprehensive Plan and development regulations will require future projects to comply with adopted statutes.
8. **List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**
  - Final Environmental Impact Statement (FEIS) for adoption of Clallam County Comprehensive Plan and Regional Comprehensive Planning issued June 1995.
  - Urban Growth Area Analysis and 10-Year Review, May 2007.
  - Clallam County Comprehensive Plan Land Capacity Analysis, July 2025.
  - Comprehensive Plan Periodic Update – Housing Element Technical Analysis, October 2025.
  - Rural Lands Report, December 2006, as supplemented.
  - LAMIRDs Report (Limited Areas of More Intensive Rural Development), September 2006, as supplemented.
  - Clallam County Demographic Profile, May 2024.
  - 2025-2030 Clallam County Homeless Housing Plan, May 2025.
  - Measuring Housing Need: A Data Toolkit for Clallam County, May 2006.
  - Clallam County Capital Facilities Plan, November 2025.
  - 2025 Clallam County Climate Vulnerability Assessment, February 2025.

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<sup>2</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background>

- Traffic Projection Volume Map with Roadway LOS, November 2025, with Technical Memorandum, December 2025.
- Clallam County Hazard Mitigation Plan, 2025.
- Carlsborg Area Transportation Study, March 4, 2008.
- Final Supplemental Environmental Impact Statement (FSEIS) for the Carlsborg Urban Growth Area, August 8, 2000.

**9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. No.**

**10. List any government approvals or permits that will be needed for your proposal, if known. Final adoption by Clallam County Commissioners.**

**11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)**

The periodic update to the Clallam County Comprehensive Plan and development regulations includes a broad range of policy and regulatory changes that will impact land use, public facilities and infrastructure, and portions of the natural environment. In general, these changes are intended to improve efforts towards environmental protection and resiliency in the face of climate change but will also introduce changes that increase the opportunity and availability of housing and economic opportunity. Specific changes that could potentially result in impacts to the natural or built environment include:

- Data throughout the document has been updated to reflect recent population trends and updated studies, adoption of the Lands Capacity Analysis, Future Land Use Map, and reference to Transportation Research Board *Highway Capacity Manual*, 7<sup>th</sup> Ed., 2022, for LOS methodology.
- Several sections have been reorganized to match the sequence within the GMA and include a range of text edits for internal consistency.
- Definitions have been updated and added, including emergency housing, emergency shelters, permanent supportive housing and transitional housing. These housing types have also been implemented within the text of the Zoning Code.
- The suspension of the Transfer of Development Rights (TDR) program pending analysis and monitoring for when economic conditions become conducive to the program's success (no TDRs utilized in 30 years)(31.02.283(3)(i)). Suspension of TDR program eliminates a substantial barrier to high-density housing, which is needed to meet affordable housing targets.
- Policy requiring the establishment of siting criteria for emergency housing (31.02.283(3)(j)).

- Include “zero lot line standards” and eliminate language concerning lot size as an alternative for housing opportunities (31.02.283(3)(b)).
- New Section added to require coordination with cities to ensure implementation of county-wide planning policies, identification of lands useful for public purposes, special consideration for achieving environmental justice and reducing wildfire risk.
- Policy framework establishing a process for determining and siting of essential public facilities (31.02.300(8)).
- Prioritizing culvert replacements and fish-barrier removals as a priority, utilizing Lead Entities to provide assistance in identifying priority projects (31.02.340(1)(f)).
- Add section regarding Climate Change and Resiliency Issues, establishing objectives and measures (31.02.810 and .820).
- Requirement that the County perform an inventory and self-evaluation concerning accessibility requirements of the Americans with Disabilities Act (ADA) and making corrections where needed (31.02.420(1)(e)(vii)).
- Included a range of text edits for internal consistency and to promote economic prosperity. Policies could lead to growth in manufacturing, tourism, timber industry, and maritime, and agritourism. Tourism focus will include expanding peak tourism seasons by promotion of year-round recreational opportunities. Growth in infrastructure is also prioritized (31.02.620).
- Expand language concerning multimodal transportation consistent with GMA requirements.
- Establish new standards for Accessory Dwelling Units in UGA’s in accordance with RCW 36.70A.681.
- Changing approximately 46.7 acres within the unincorporated Sequim Urban Growth Area from Sequim Urban Residential II (SR-II) to Sequim Urban Residential III (SR-III).
- Changing all of the current Urban Residential High (URH) Designation to the Urban Moderate Density (MD) designation within the Clallam Bay/Seki UGA.

**12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist. The changes to the Comprehensive Plan and Development regulations will form the basis for regulatory frameworks affecting all lands within unincorporated Clallam County.**

## B.Environmental Elements

### 1. Earth

[Find help answering earth questions<sup>3</sup>](#)

- a. **General description of the site:** All: Flat, rolling, hilly, steep slopes, mountainous
- b. **What is the steepest slope on the site (approximate percent slope)?** Slopes throughout Clallam County include flat to extreme vertical slopes.
- c. **What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)?** If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. All soil types.
- d. **Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.** Clallam County includes a full range of slope stabilities. Generally, unstable slopes are avoided through application of the County's Critical Areas Ordinance.
- e. **Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.** None for this non-project action. Future projects will be reviewed and mitigation required to address these concerns.
- f. **Could erosion occur because of clearing, construction, or use? If so, generally describe.** Not directly from this non-project action. Future projects will be reviewed and mitigation required to address these concerns.
- g. **About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?** This is a non-project action so this is not applicable. Future development has the potential to introduce impervious surfaces across the landscape, within the limits established by applicable land use and environmental regulation.
- h. **Proposed measures to reduce or control erosion, or other impacts to the earth, if any.** This is a non-project action. Future development will be subject to drainage plan requirements, and where applicable, standards of the Critical Areas Ordinance or the Shoreline Master Program.

### 2. Air

[Find help answering air questions<sup>4</sup>](#)

- a. **What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe**

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<sup>3</sup> <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth>

<sup>4</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air>

**and give approximate quantities if known.** None. This is a non-project action. Future development allowed under these changes will be evaluated on a case-by-case basis for potential impacts.

- b. **Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.** No, this is a non-project action. There is the potential for off-site sources of emissions or odor to impact future developments and uses. Future developments will be reviewed on a case-by-case basis, and if the potential for such impacts are present, mitigation will be required. In some cases, like ongoing commercial forest or agricultural operations, such nuisances are tolerated in the interest of protecting these preferred land uses. Notice to property owners is required under 33.40.110 to help alert residents to the risks.
- c. **Proposed measures to reduce or control emissions or other impacts to air, if any:** None. See notice requirements, 33.40.110. Other future land uses with the risk of air emission impacts will be evaluated on a case-by-case basis.

### 3. Water

[Find help answering water questions<sup>5</sup>](#)

a. **Surface:**

[Find help answering surface water questions<sup>6</sup>](#)

1. **Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.** There are a variety of water bodies around the County.
2. **Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.** Not as a part of this non-project action. Future development may occur within 200-feet of designated shorelines or aquatic habitat areas and will be reviewed for compliance with current regulations.
3. **Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.** Not as a part of this non-project action. It is not possible to estimate the amount of fill or dredge material from future development.
4. **Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.** Not as a part of this

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<sup>5</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water>

<sup>6</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water>

non-project action. Future development proposals may involve surface water withdrawals or diversions, but will be evaluated on a case-by-case basis.

5. **Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.** Not as a part of this non-project action. Future development may occur within the 100-year floodplain but will be reviewed on a case-by-case basis and will be required to follow current regulations.
6. **Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.** Not applicable for this non-project action. Future development may include discharges of waste materials to surface waters, but will be reviewed on a case-by-case basis.

**b. Ground:**

[Find help answering ground water questions](#)<sup>7</sup>

1. **Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.** Changes to the zoning code and Zoning Map that will increase density in Urban Growth Areas will occur in areas already served by public water and sewer. Before development occurs the water purveyor and public sewer provider will be contacted to ensure availability to allow higher density development. If wells and septic systems are proposed they will be installed according to health regulations, including consideration of adequate room for well-head protection, septic and reserve. This will likely preclude high density development in areas not served by public water and sewer.
2. **Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.** It is not possible to determine the number or location of future septic systems, or the uses for which they are intended. Generally, higher-density land uses (high-density residential, commercial, industrial) will be served by public sewer and water. Those that rely on onsite systems will be evaluated at the time of application for adequacy and use consistent with environmental health regulations.

**c. Water Runoff (including stormwater):**

1. **Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.** None anticipated for this non-

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<sup>7</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater>

project action. Future development will likely produce runoff. Area wetlands, streams, rivers, and ultimately the Strait of Juan de Fuca or the Pacific Ocean, will be the ultimate destination. At a minimum, all land disturbing activities and development permits requires a project drainage permit through the Clallam County Public Works Department. This requirement is expanded for larger projects and projects that are within 200-feet of a shoreline or critical area, to require engineering.

2. **Could waste materials enter ground or surface waters? If so, generally describe.** None anticipated for this non-project action. The risk of sedimentation or other materials transport via stormwater is always a concern for new development. As noted, the drainage permit requirement addresses the concerns regarding this section.
3. **Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.** None anticipated for this non-project action. Future development could alter existing drainage patterns. However and as noted, larger projects involving significant alteration are required to have prepared an engineered drainage plan intended to control stormwater accumulation, quality and discharge rates to approximate natural conditions.
4. **Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:** None contemplated for this non-project action. For future development, rely on the existing stormwater permitting process to address concerns on a case-by-case basis.

## 4. Plants

[Find help answering plants questions](#)

- a. **Check the types of vegetation found on the site:** All
  - deciduous tree: alder, maple, aspen, other**
  - evergreen tree: fir, cedar, pine, other**
  - shrubs**
  - grass**
  - pasture**
  - crop or grain**
  - orchards, vineyards, or other permanent crops.**
  - wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**
  - water plants: water lily, eelgrass, milfoil, other**
  - other types of vegetation**

- b. **What kind and amount of vegetation will be removed or altered?** This is a non-project action. Any future development will be reviewed for compliance with County and State regulations on a case-by-case basis.
- c. **List threatened and endangered species known to be on or near the site.** There are ESA listed species located within Clallam County. Although there are no impacts anticipated from this non-project action, future development could potentially impact habitat relied on by one or more of these species. Implementing a policy of no net loss and implementing BAS in the shoreline and critical area protection standards will help address the concerns of this section. Subdivisions and non-exempt developments require the routing of SEPA documents to area Tribes and agencies. This process will assist in understanding whether a proposal may have a significant impact on a listed species.
- d. **Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.** None anticipated for this non-project action. As noted under (c), above, the routing of projects for comment and the application of improved protection standards will help address the concerns of this section.
- e. **List all noxious weeds and invasive species known to be on or near the site.** There are several types of noxious weeds that occur within Clallam County. The Washington State University Extension Agent's Office maintains a list and protocol for controlling, and assisting landowners in controlling noxious weeds.

## 5. Animals

[Find help answering animal questions](#)<sup>8</sup>

- a. **List any birds and other animals that have been observed on or near the site or are known to be on or near the site.** All could exist in areas affected by this non-project action.

**Examples include:**

- **Birds: hawk, heron, eagle, songbirds, other:**
  - **Mammals: deer, bear, elk, beaver, other:**
  - **Fish: bass, salmon, trout, herring, shellfish, other: ALL OF THE ABOVE.**
- b. **List any threatened and endangered species known to be on or near the site.** There are ESA listed species and their designated habitats located within Clallam County. As noted, use of agency comments and application of BAS-compliant protection measures will help to protect such habitats from encroachment and impacts from future development.
  - c. **Is the site part of a migration route? If so, explain.** There are migration routes in Clallam County, in particular, on the west end of the County near the Washington Coast. With the majority of this area in designated Commercial Forest land use, development

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<sup>8</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals>

encroachment will be kept to a minimum well into the future. Critical areas shoreline protection standards will further reduce adverse impacts to waterfowl and other migratory bird corridors.

- d. **Proposed measures to preserve or enhance wildlife, if any.** The changes proposed include increases to critical area buffers in accordance with BAS that will preserve habitat for wildlife.
- e. **List any invasive animal species known to be on or near the site.** There are invasive species located within Clallam County. As noted, the WSU Extension Office operates a program for identifying and eradicating invasive encroachment.

## 6. Energy and natural resources

[Find help answering energy and natural resource questions<sup>9</sup>](#)

- a. **What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.** Currently, Clallam County relies heavily on the Bonneville Power Administration for electrical service, as administered by PUD #1 of Clallam County. Under proposed policies 31.02.820(6)(b & c), and (11)(a), as part of maintaining resilience, Clallam County will be supporting efforts to explore alternative, local energy generation.
- b. **Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.** Use of solar energy is supported under the Comprehensive Plan Update (31.02.820(2)(b), and (6)(b&c)).
- c. **What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.** Although a non-project action, proposed policies include provisions to reduce energy use and resilience (31.02.820(2&3)).

## 7. Environmental health

[Health Find help with answering environmental health questions<sup>10</sup>](#)

- a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.**
  - 1. **Describe any known or possible contamination at the site from present or past uses.** None anticipated for this non-project action. Sites that are known to be contaminated must be restored before further site-disturbing activities are allowed.

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<sup>9</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou>

<sup>10</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health>

2. **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.** None anticipated for this non-project action. Areas known to contain contaminants must be restored before further site disturbance or new development. These matters are managed on a case-by-case basis with protocols tailored to the specific site conditions and nature of the contamination.
3. **Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.** None anticipated for this non-project action. See subsection 2, above.
4. **Describe special emergency services that might be required.** None anticipated for this non-project action. Increases in density may require additional emergency services and will be reviewed as part of any proposed development resulting from the proposed changes to the Comprehensive Plan and development regulations.
5. **Proposed measures to reduce or control environmental health hazards, if any.** None anticipated for this non-project action. Specific changes/increases in emergency response services will be based on growth as it occurs. Based on changes proposed to the Comprehensive Land Use Map, the only likely place will be the Sequim Urban Growth Area. Fire District #3 already approved a levy resulting in significant revenue increases for the district, and eliminating the need to consider other funding mechanisms, such as impact fees.

b. Noise

1. **What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?** None anticipated for this non-project action.
2. **What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?** None anticipated for this non-project action. Future development could result in significant noise impacts to neighboring properties. Uses that could generate such impacts will be reviewed under SEPA and reasonably conditioned to address such issues.
3. **Proposed measures to reduce or control noise impacts, if any:** The SEPA process allows the DCD to review project proposals for potential impacts, including noise. Substantive authority allows for reasonable conditions to address noise impacts, such as barrier and vegetation buffering, hours of operation, or even project denial.

## 8. Land and shoreline use

[Find help answering land and shoreline use questions](#)<sup>11</sup>

- a. **What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.** This is a non-project action; however, future land use allowed under these changes will affect the character of the community into the future. One of the main objectives of land use planning is to direct development to areas with similar development characteristics so that conflicts can be minimized, such as industrial uses within industrial parks, businesses within commercial centers, and residences within established neighborhoods. In reliance on this principle, the impacts of new development should be minimal if appropriately located by zoning.
- b. **Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?** Not applicable, this is a non-project action. Several areas throughout Clallam County have a history of agricultural use, and agriculture still remains viable in the eastern portion of the County. Strategies have been implemented to support farms and avoid the conversion of commercial farmland to non-farm uses. Strategies to supplement farms through agritourism and other supportive-scale commercial uses have had a positive impact on the continuation of agriculture. The County has supported the Conservation Futures program, which has resulted in the purchase of development rights for 81.9 acres of prime farmland, currently, and 173 acres pending. Once acquired, the purchase of development rights will preserve the lands from future development indefinitely.

The proposed changes also include suspending the Transfer of Development Rights (TDR) program. Although designed to help protect commercial agricultural lands, economic conditions in Clallam County have not supported the use of the program. Not one TDR has occurred in Clallam County in the programs 30 years of existence. As such, it is not currently protecting agriculture but is acting as a barrier to affordable housing. Conditions will be monitored by the County, and the program will be reinstated once market factors are supportive of the program's success.

- c. **Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?** Not anticipated for this non-project action. Farmland is distributed through rural Clallam County and often has neighbors of low and moderate-density residential areas. Clallam County has a right-to-farm policy in which property owners are provided notice if within 500 feet of designated agricultural lands or commercial forest lands. The notice (33.40.110) advises the owner of designated agricultural land's (or commercial forest) right to practice farming (or

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<sup>11</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use>

forestry), and that nuisance complaints will not be investigated unless the activity is operating outside of best practices.

- d. **Describe any structures on the site.** None anticipated for this non-project action.
- e. **Will any structures be demolished? If so, what?** None anticipated for this non-project action. Demolition of buildings in the future is anticipated to replace old and dilapidated structures.
- f. **What is the current zoning classification of the site?** This is a non-project action.
- g. **What is the current comprehensive plan designation of the site?** This is a non-project action making changes to the Comprehensive Plan and development regulations.
- h. **If applicable, what is the current shoreline master program designation of the site?** All shoreline designations as they currently exist within the County for this non-project action.
- i. **Has any part of the site been classified as a critical area by the city or county? If so, specify.** Yes. All critical area designations will exist throughout the County for this non-project action.
- j. **Approximately how many people would reside or work in the completed project?** Changes to the comprehensive plan are proposed to reallocate higher residential densities within the Urban Growth Areas of Clallam Bay/Seki and Sequim to meet the affordable housing requirements of the Growth Management Act and the change to development regulations will allow additional accessory dwelling units on property within UGA's.
- k. **Approximately how many people would the completed project displace?** This is a non-project action. Future development could create real estate and economic opportunities that, in some cases, might result in the displacement of economically challenged residents. Policies to avoid displacement are being proposed (31.02.281(2) and .320(3)).
- l. **Proposed measures to avoid or reduce displacement impacts, if any.** As noted, 31.02.281(2) requires measures to avoid the displacement of low, very low, and extremely low-income households as local communities develop. Also, 31.02.320(3) requires that infrastructure investments consider the potential for displacement impacts before implementing.
- m. **Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.** Changes to the Comprehensive Plan are being proposed to ensure compatibility with existing land uses and plans and the projected growth and opportunities within the County in compliance with the Growth Management Act. The proposed draft has been reviewed and found to be internally consistent, and consistent with the Clallam Countywide Planning Policies, and as proposed, all development regulations.

- n. **Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:** See discussion under subsections (b) and (c) above.

## 9. Housing

[Find help answering housing questions](#)<sup>12</sup>

- a. **Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.** In determining future population growth over the 20-year planning horizon, Clallam County relied on the Housing for All Planning Tool, method C (HAPT C), as provided by the Department of Commerce. Under the medium growth projected, the HAPT C projected a population increase by 2045 of 9,545 people, bringing the County's total to 86,700. Translating the population growth to projected housing needs based on household income, the HAPT C model produced the following:

	0-30% AMI						Emergency Housing (temp)	Total	
	Non-PSH *	PSH *	>30-50%	>50-80%	>80-100%	>100-120%			>120%
City of Forks	100	45	92	37	13	10	2	27	326
Forks UGA	10	5	9	4	1	1	0	3	33
City of Port Angeles	664	299	605	241	85	63	13	173	2143
Port Angeles UGA	100	45	91	37	13	10	2	27	325
City of Sequim	623	280	568	227	80	61	11	164	2014
Sequim UGA	100	45	91	37	13	10	2	27	325
Clallam Bay/Seki UGA	10	5	9	4	1	1	0	3	33
Joyce UGA	0	0	0	0	0	0	0	0	0
Carlsborg UGA	60	27	55	22	8	6	1	16	195
Unincorporated Rural	0	0	0	124	44	34	812	0	1014
<b>Total:</b>	<b>1667</b>	<b>751</b>	<b>1520</b>	<b>733</b>	<b>258</b>	<b>196</b>	<b>843</b>	<b>440</b>	<b>6408</b>

- b. **Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.** No anticipated housing will be lost due to this non-project action. As noted, the new policies include antidisplacement provisions to avoid unintended impacts on economically challenged households. The recommendation within the Comprehensive Plan is to allocate additional housing throughout the County commensurate to where the need is anticipated.

<sup>12</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing>

- c. **Proposed measures to reduce or control housing impacts, if any:** The Comprehensive Plan is intended to provide recommendations for the allocation of housing units throughout the County to address housing needs.

## 10. Aesthetics

[Find help answering aesthetics questions](#)<sup>13</sup>

- a. **What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?** This is a non-project action and does not propose any structures.
- b. **What views in the immediate vicinity would be altered or obstructed?** This is a non-project action. Impacts of future development will be addressed on a case-by-case basis.
- c. **Proposed measures to reduce or control aesthetic impacts, if any:** This is a non-project action. Aesthetic impacts resulting from future development will be addressed on a case-by-case basis.

## 11. Light and glare

[Find help answering light and glare questions](#)<sup>14</sup>

- a. **What type of light or glare will the proposal produce? What time of day would it mainly occur?** There is nothing proposed for this non-project action. The strengthening of policies under 31.02.340(11)(b) will help to address impacts to nighttime glare resulting from new development.
- b. **Could light or glare from the finished project be a safety hazard or interfere with views?** This is a non-project action and is not applicable. The changes to 21.02.340(11)(b) address the concerns of this section.
- c. **What existing off-site sources of light or glare may affect your proposal?** Not applicable.
- d. **Proposed measures to reduce or control light and glare impacts, if any:** changes proposed to 31.02.340(11)(b) will reduce uncontrolled nighttime light and minimize glare impacts from new development, once implemented.

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<sup>13</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics>

<sup>14</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare>

## 12. Recreation

[Find help answering recreation questions](#)

- a. **What designated and informal recreational opportunities are in the immediate vicinity?** There is no specific site involved in this non-project action. Formal and informal recreation opportunities exist throughout Clallam County.
- b. **Would the proposed project displace any existing recreational uses? If so, describe.** There are no recreational sites or established uses that are likely to be impacted or displaced as a result of the changes being considered to the Comprehensive Plan or development regulations.
- c. **Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:** No recreational opportunities will be reduced or eliminated by these policy changes. Specific changes to 31.02.820(10)(c) will help ensure parks and recreational facilities are resilient to climate change and continue to meet the needs of the community.

## 13. Historic and cultural preservation

[Find help answering historic and cultural preservation questions](#)<sup>15</sup>

- a. **Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.** There are historic buildings, structures and sites throughout Clallam County.
- b. **Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.** There are areas of cultural significance and material artifacts throughout Clallam County.
- c. **Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.** Presently, Clallam County provides notice to area Tribes and the Department of Archaeological and Historic Preservation as part of the SEPA review process. Areas of concern and requests for protection measures are addressed through the final SEPA determination at the project level.
- d. **Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.** Section 31.02.350 incorporates several changes requested by area Tribes to strengthen the review and conditioning of new development to avoid impacts to areas of known artifacts, historic or cultural significance.

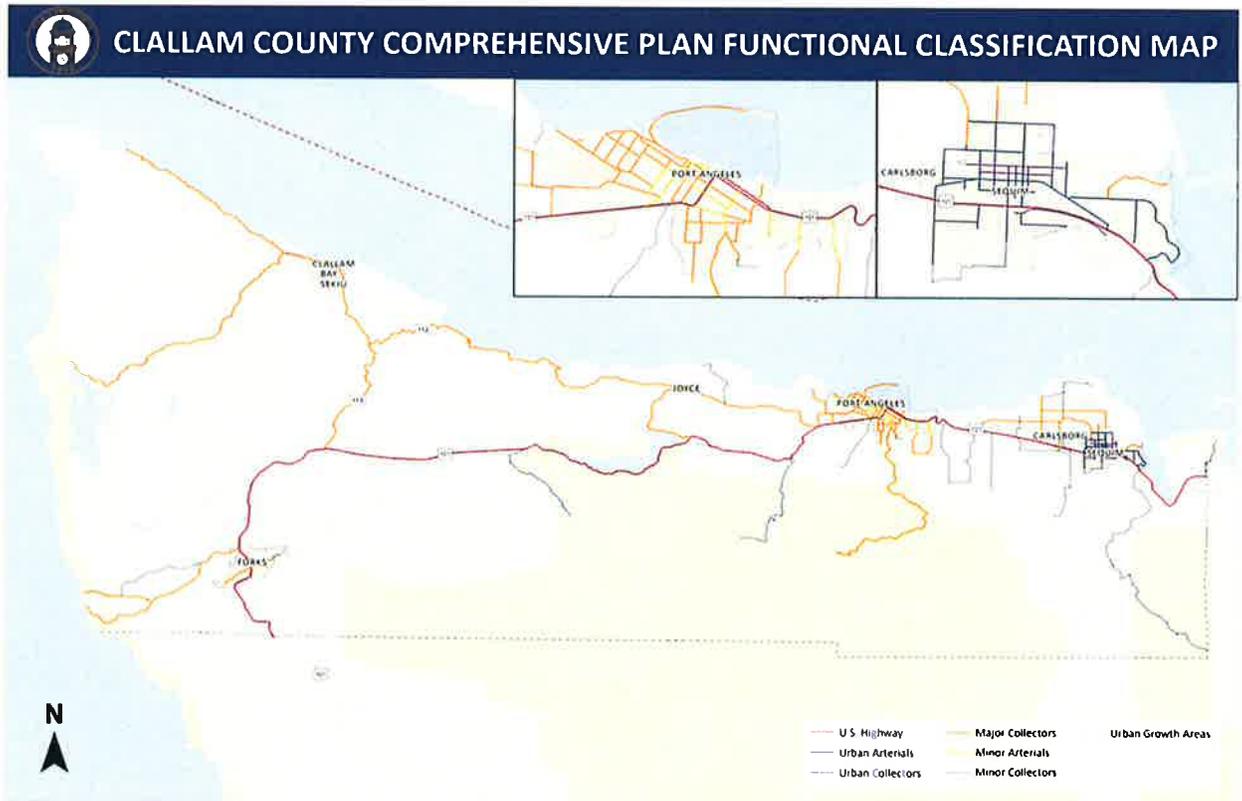
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<sup>15</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p>

## 14. Transportation

Find help with answering transportation questions<sup>16</sup>

- a. **Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.** The motorized transportation network for Clallam County consists of arterials, major and minor collectors and local access roads. The following map shows the distribution of Federally Functional Classification for the County's major roadways:



- b. **Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?** Clallam Transit provides service throughout Clallam County.
- c. **Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).** No. The only changes being considered to land use density are within the Clallam Bay/SekiU UGA and the unincorporated Sequim UGA. An increase in residential density within the Clallam Bay/SekiU UGA is required in order for the County to meet its housing targets for low, very low and extremely low-income households. Current zoning does not allow for high-

<sup>16</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation>

density residential developments (e.g. apartments), which are needed to provide affordable housing to these segments. However, the growth trend in the Clallam Bay/Seki UGA is very slight. Only 48 new residential units are expected to be needed over the next 20 years. Even though the capacity created by the zoning change is significant, the realistic expectation of growth is minimal, which should result in no significant change beyond what has already been expected under existing plans.

In the Sequim UGA, a total of 147 high-density residential units are needed to meet the projected needs of low, very low and extremely low-income households. Because the market is more active in Sequim, changes in density are expected to achieve related results over the 20-year planning horizon. Consideration has been given to increasing the residential density of two discrete neighborhoods within the UGA, totaling 47.1 acres. An analysis, similar to that which was conducted for the 2025 Land Capacity Analysis, was completed for these two neighborhoods, contemplating a change from the current S(R-II) zone to the S(R-III) zone (change from maximum of five units/acre to 10 units/acre). Although the area included is 47.1 total acres, after removing currently developed parcels, accounting for vacancy, parcels with additional capacity, and applying a uniform market factor, the net usable acreage is determined to be 22.0 acres, with a high-end capacity of 220 additional units.

An earlier version of this analysis, contemplating 17.5 acres (adjusted) and a high-end capacity of 175 additional units, was incorporated into a traffic analysis that projected traffic counts out to the end of the 20-year planning horizon and calculated its impact on intersection levels of service (see Exhibit L). The analysis found that all intersections evaluated met adopted LOS standards over the 20-year projection. The difference between the zoning change evaluated in the traffic analysis (175 units) and the currently proposed change (220 units) is 45 maximum residential units. Utilizing the Trip Generation Manual of 10 trips per day per unit, full buildout of this potential would produce 450 additional trips per day. In applying this unaccounted-for demand to the projection model, the increase in trips per day, even if all were concentrated at one intersection, would not trigger any change in LOS. This information verifies that the proposed changes in zoning will not adversely impact the transportation network over the 20-year planning horizon.

- d. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.** As part of the Economic Development element, commercial water transportation is contemplated and promoted to take advantage of the Port of Port Angeles as a deep-water port in close proximity to the region's industrial core. This, however, is within the jurisdiction of the City of Port Angeles and the Port. Air transportation continues to be supported, but policy changes are not substantive.
- e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?** This is a non-

project action. Future development under the new policies are expected to generate additional traffic. In particular, analysis was completed for intersection impacts within the Sequim UGA (see above). Other impacts are expected to be commensurate with development scenarios already contemplated under earlier versions of the Comprehensive Plan.

- f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.** The proposed changes to the Comprehensive Plan are not anticipated to affect movement of products within the County.
- g. **Proposed measures to reduce or control transportation impacts, if any:** Nothing is proposed. Specific projects resulting from the updates to the Comprehensive Plan will be reviewed at the time of those project proposed.

## 15. Public services

[Find help answering public service questions<sup>17</sup>](#)

- a. **Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.** The changes proposed do not anticipate immediate increases in public services. These services will increase commensurate with new development.
- b. **Proposed measures to reduce or control direct impacts on public services, if any.** The Capital Facilities Plan (Appendix I) and Sections 31.02.320(5) and .420(6)(e), require that the Land Use Element be reevaluated should funding needed to meet public service facility needs fall short.

## 16. Utilities

[Find help answering utilities questions<sup>18</sup>](#)

- a. **Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:** Various utilities exist throughout the County. The propose changes are not anticipated to affect availability of utilities.
- b. **Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.** There are no changes to utilities based on the changes to the Comprehensive Plan that are proposed. Individual projects resulting from the proposed changes will be reviewed when proposed.

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<sup>17</sup> <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services>

<sup>18</sup> <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities>

## C. Signature

[Find help about who should sign](#)<sup>19</sup>

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

X 

Type name of signee: Bruce Emery

Position and agency/organization: Director, Clallam County Department of Community Development

Date submitted: 12/30/2025

## D. Supplemental sheet for nonproject actions

[Find help for the nonproject actions worksheet](#)<sup>20</sup>

Do not use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

- 1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?** The proposed changes to the Comprehensive Plan will not create any discharge to water, emission to air, involve toxic or hazardous substance, or result in the production of noise.
  - **Proposed measures to avoid or reduce such increases are:** Nothing proposed.
- 2. How would the proposal be likely to affect plants, animals, fish, or marine life?** The proposed change to the Comprehensive Plan will have no affects to plants, animals, fish, or marine life. The Plan requires continued refinement of best available science and its

<sup>19</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature>

<sup>20</sup> <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions>

regulatory application, including provisions of the Critical Areas Ordinance, which will be completed within 12-months of adoption.

- **Proposed measures to protect or conserve plants, animals, fish, or marine life are:** Per the GAP analysis and review of BAS, it has been determined that expanded buffer widths that coincide with site potential tree height will implement what is considered to be best available science. Additionally, riparian buffers will be treated as critical areas. These changes alone represent significant improvements in the conservation of plants, animals, fish and marine life throughout Clallam County.

3. **How would the proposal be likely to deplete energy or natural resources?** Increase in the number of houses and businesses will require a draw from existing energy resources, but the anticipated growth is not enough of a change to necessitate changes to the existing infrastructure in the County. Proposed changes will add density in existing urban growth areas.

- **Proposed measures to protect or conserve energy and natural resources are:** Individual projects and construction of houses will be reviewed for compliance with energy regulations and critical area and shoreline codes.

4. **How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?** The proposed changes to the Comprehensive Plan will not affect environmentally sensitive areas. As noted above, standards are being considered to match wetland and riparian buffers to site potential tree height.

- **Proposed measures to protect such resources or to avoid or reduce impacts are:** Existing and proposed changes to the regulations will ensure development meets standards imposed by the State and BAS.

5. **How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?** The proposed changes will increase the density allowed within UGA's and allow an additional accessory dwelling unit to be constructed within UGA's.

- **Proposed measures to avoid or reduce shoreline and land use impacts are:** Existing and proposed regulations will ensure protection measures of the shoreline.

6. **How would the proposal be likely to increase demands on transportation or public services and utilities?** The changes to the Comprehensive Plan will allow for some areas

of greater densities within Urban Growth Areas. As noted earlier, the current transportation network has been evaluated and determined to be adequate to meet the future demand.

- **Proposed measures to reduce or respond to such demand(s) are:** None. The proposed changes will not result in a loss of service on the transportation or public services and utilities.

- 7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.** The proposed amendments to the Comprehensive Plan and the development regulations are in response to the need to remain compliant with the Growth Management Act. There will be no conflicts with local, state, or federal laws for the protection of the environment.