CITY OF SEQUIM

To: Sequim Planning Commission

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1 Executive Summary

The City received extensive written and oral public comments regarding the Draft 2025 Comprehensive Plan Periodic Update and proposed amendments to Title 18 of the Sequim Municipal Code (SMC).

This Issues and Response Memo is intended to assist the Planning Commission in its continued public hearing and deliberations by organizing recurring and overlapping comments into issues and themes. It does not replace the individual comments or the Public and Agency Comment Matrix. Rather, it provides a consolidated response to the substantive issues raised by multiple commenters and identifies revisions to the Draft Comprehensive Plan and Title 18 recommended for Planning Commission consideration.

For purposes of this response memo, the recurring and overlapping comments have been organized into four broad issue areas:

1. *Infrastructure* including water, wastewater, transportation and stormwater
2. *Housing and Growth*
3. *Critical Areas, Natural Resources, and Climate Resilience*
4. *Specific Proposed Amendments to Comprehensive Plan Policies and Title 18 Development Regulations*.

2 Purpose and Background

2.1 Periodic Update Process

The City of Sequim is undertaking its periodic review and update of the Comprehensive Plan and implementing development regulations pursuant to the Washington State Growth Management Act (GMA), Chapter 36.70A RCW.

The 2025 Comprehensive Plan Periodic Update establishes the City's long-range planning framework through 2045. The update addresses projected population, housing, and employment growth and includes updated goals, policies, maps, and technical analyses, addressing land use, housing,

transportation, capital facilities and utilities, economic development, natural environment, climate resilience, parks and open space, and community character. The City is concurrently updating SMC Title 18 Zoning to maintain consistency between the Comprehensive Plan, development regulations, and applicable changes in state law.

The City's periodic update process began in 2024 and has included community outreach and visioning, stakeholder engagement, technical analysis, Planning Commission and City Council review, preparation and review of individual Comprehensive Plan elements, evaluation of the Future Land Use Map and zoning, preparation of updated capital facilities and transportation plans, development-regulation amendments, and environmental review under the State Environmental Policy Act (SEPA).

On July 13, 2026, the City released the Draft 2025 Comprehensive Plan and Appendices, Draft SMC Title 18 Zoning, and Draft Supplemental Environmental Impact Statement (DSEIS) for formal public review. The DSEIS evaluated the environmental effects of the proposed periodic update and development regulations as the Action Alternative, compared with continued implementation of the 2015 Comprehensive Plan and existing SMC Title 18 as the No Action Alternative.

The Planning Commission opened its public hearing on the Draft Comprehensive Plan and Draft SMC Title 18 on September 1, 2026. Following receipt of substantial written public comment prior to the hearing and oral testimony, the Planning Commission continued the public hearing to October 6, 2026 to provide City staff additional time to review the comments and prepare this Issues and Response Memo to support Planning Commission deliberations.

2.2 Public Participation and Comment Record

Public participation has been an ongoing component of the periodic update process. The City created and adopted a Public Participation Plan to provide for early and continuous public involvement and to identify opportunities for community participation throughout the planning process.

Beginning in 2024, public engagement included stakeholder interviews; community visioning and planning-scenario workshops; open houses; Farmers Market outreach; an online community survey; a future land use alternatives workshop; and a housing focus group. Outreach continued during development of the draft plan through publicly noticed Planning Commission meetings, joint City Council and Planning Commission workshops, advisory-board review, stakeholder discussions, public presentations, developer forums, newsletters, and other community engagement opportunities.

The formal public review period began July 13, 2026 with release of the Draft Comprehensive Plan, associated Appendices, Draft SMC Title 18, and DSEIS. The City provided notice of the release to its community notification list, affected agencies and jurisdictions, the Jamestown S'Klallam Tribe, and state agencies, and published notice in the Peninsula Daily News. Draft documents, notices, project information, and opportunities to comment have also been maintained on the City's Comprehensive Plan Update webpage.

During the formal review period, the City accepted comments through email, an online comment form, in-person open houses, developer’s forum, Planning Commission meetings, and the Planning Commission public hearing. The City also conducted a separate 30-day comment period on the DSEIS

from July 13 through August 13, 2026. Comments specific to the DSEIS are being addressed through the Final Supplemental Environmental Impact Statement.

Comments on the Draft Comprehensive Plan and Draft Title 18 have been compiled as part of the legislative record. The Public and Agency Comment Matrix provides an index and summary of comments received, while the complete written submissions are retained as part of the public hearing record. The City will continue to accept public comment on the Draft Comprehensive Plan and Draft SMC Title 18 through the conclusion of the public hearing process.

2.3 Purpose of the Response Memo

The City received a substantial volume of public and agency comments on the Draft Comprehensive Plan and Draft Title 18. Many comments address the same or substantially similar issues, and several commenters submitted multiple comments addressing related subjects. Responding separately to each individual submission would result in substantial repetition and would make it more difficult to identify the principal policy and regulatory issues presented for Planning Commission consideration.

Accordingly, this Issues and Response Memo organizes substantive comments by issue. The purpose of this approach is to provide the Planning Commission with a clear and manageable record of the principal issues raised during public review, the City's analysis of those issues, and any revisions staff recommends in response.

For purposes of this document, comments have generally been consolidated into four principal issue areas:

1. *Infrastructure*, including water, wastewater, transportation and stormwater
2. *Housing and Growth*
3. *Critical Areas, Natural Resources and Climate Resilience*
4. *Specific Proposed Amendments to Comprehensive Plan Policies and Title 18 Development Regulations.*

The consolidation of comments by subject matter does not exclude or disregard individual comments. Individual written and oral comments remain part of the legislative record and have been considered as part of the City's review. A comment may also relate to more than one consolidated issue and may therefore inform the City's analysis in multiple sections of this document.

2.4 Comprehensive Plan Periodic Update versus Project-Level Review

The Comprehensive Plan establishes the City’s long-range policy framework for accommodating projected growth and guiding future land use, housing, transportation, public facilities and utilities, natural environment, parks, economic development, and other community needs. The Growth Management Act requires development regulations to be consistent with and implement the Comprehensive Plan. Together, they establish the framework for future development decisions.

The Comprehensive Plan is not, however, a project-level development approval. Adoption of a land use designation, zoning classification, growth assumption, capital facility policy, or other long-range planning provision does not authorize a particular development. Nor can every site specific impact be determined

at the comprehensive planning stage, when the location, size, design, timing, and infrastructure demands of future projects may not yet be known.

The periodic update therefore evaluates impacts and infrastructure needs at the planning level. This includes whether the City has planned for its allocated population, housing, and employment growth; has sufficient land capacity; has planned transportation, utilities, and capital facilities to serve anticipated growth and provides goals, policies, maps, and development regulations sufficient to guide future decisions.

Individual development proposals are subsequently reviewed for consistency with the Comprehensive Plan and applicable development regulations and technical standards. Project-level review may identify site specific infrastructure improvements, environmental protections, mitigation measures, or other conditions necessary to meet City requirements.

3 Consolidated Issues, Analysis and Response

3.1 Infrastructure

3.1.1 Growth Management Act (GMA) Context

RCW 36.70A.070(3) requires a comprehensive plan to include a capital facilities element that inventories existing publicly owned capital facilities and their locations and capacities; forecasts future facility needs based on anticipated growth; identifies the general locations and capacities of expanded or new facilities needed to serve that growth; provides at least a six-year financing plan identifying reasonably available funding sources; and requires reassessment of the land use element if probable funding is insufficient to meet identified needs. The capital facilities, land use, and financing components of the Comprehensive Plan must therefore be coordinated so that the amount and distribution of growth contemplated by the Plan are reasonably supported by the facilities necessary to serve that growth.

Growth Management Hearings Board (GMHB) decisions have consistently interpreted these requirements as long-range, system-level planning obligations rather than project-level engineering requirements. Functional plans, including adopted water and sewer system plans, may provide the supporting inventory, capacity, needs, and improvement analysis when appropriately incorporated or referenced in the Comprehensive Plan. The relevant inquiry is whether the jurisdiction has reasonably demonstrated that adequate capital facilities can be provided to accommodate projected growth over the planning horizon. Where the record demonstrates an actual or projected capacity deficiency, the jurisdiction must identify a credible means of addressing that deficiency through planned facilities, financing, or reconsideration of its growth assumptions. Conversely, the GMA does not require all facilities to be constructed in advance of growth, nor does it require a comprehensive plan to determine the infrastructure needs of every individual parcel or potential development.

Most recently, in *Breske v. City of Seattle*, GMHB Case No. 26-3-0001c (Sept. 9, 2026), the Board synthesized its prior decisions in *Futurewise v. Spokane County* and *Suquamish Tribe v. Kitsap County* and held that the capital facilities element must demonstrate that sufficient facilities will exist "at the systemwide level to support projected growth at an areawide level" and that "[s]o long as the area as a whole will have sufficient capital facilities, the requirements of RCW 36.70A.070(3) have been met." *Id* at 17. The Board expressly distinguished this comprehensive planning inquiry from the

more detailed analysis appropriately undertaken during project level review, concluding that the GMA does not require a jurisdiction to establish that every possible development on every individual parcel can presently be served. Accordingly, GMA compliance is evaluated by whether the Comprehensive Plan and incorporated functional plans reasonably demonstrate adequate systemwide capacity for anticipated growth, identify necessary future improvements, and establish a financially realistic strategy for providing those improvements as growth occurs.

3.1.2 Growth Assumptions Used in the City's Capital Facilities Planning

The City's capital facilities planning uses the adopted 2045 population, housing, and employment allocations to evaluate the growth anticipated under the Draft Comprehensive Plan. Those allocations include 2,959 additional residents, 1,850 housing units, and 909 jobs—equivalent to average annual population growth of approximately 1.3 percent through 2045 (using the required planning period of 2020-2045). The City's sewer and transportation consultants used the specific numerical allocations to model future demand (accounting for years expended), capacity, and required improvements. (Appendix B-1A Sanitary Sewer Capacity Memo and Appendix B-2 Transportation Master Plan).

The 2023 Water System Plan was completed before the 2045 GMA population allocation was available. For its 20-year demand forecast and capacity analysis, the Plan instead assumed annual population growth of 3.0 percent. It evaluated projected water demand, source and storage capacity, distribution-system needs, and capital improvements under that higher growth scenario.

Accordingly, the difference in assumptions does not understate future water demand, infrastructure needs or create an inconsistency. The Water System Plan evaluates the water system under a growth scenario greater than the approximately 1.3 percent annual growth reflected in the adopted 2045 allocation, which is the minimum GMA requires. Sewer and transportation analyses evaluate the adopted allocations directly.

3.1.3 Water

Responds to Public Comments #2, 4, 5, 13, 14, 17, 18, 23, 24, 25, 26, 28, 29, 31, 32, 38.A, 39, 52, 60, 62, 64, 68, 68.A, Commissioner Fane and 9/1/2026 public hearing

Washington Water Law and State Regulatory Oversight

The following section summarizes applicable state water law and regulatory oversight, based on the memorandum prepared by Confluence Law, included as Exhibit 6A. The Confluence Law Memorandum summarizes the City of Sequim Water Rights, regulation of the City's Water System by the Washington State Department of Health, Washington State Department of Ecology's oversight of Available Water Supplies, and the role of planning efforts under the Growth Management Act.

Washington treats water as a public resource, while recognizing valid water rights as property interests and licenses to use public water. The State follows the prior-appropriation doctrine: generally, senior water rights have priority over later rights, and new or expanded uses may not impair senior rights or legally established instream flows. The Washington State Department of Ecology (DOE) administers surface water and groundwater rights, including water right permits and certificates, groundwater management, instream-flow rules, mitigation, and enforcement.

The following table illustrates the state agencies and principal requirements.

AREA	PRIMARY AUTHORITY	WHAT IT MEANS FOR SEQUIM
WATER RIGHTS AND WATER AVAILABILITY	Washington State Department of Ecology; 90.03, 90.22, 90.42, 90.44, 90.54 RCW	The City must operate within the quantity, purpose, place-of-use, and other conditions of its water right authorizations. Future supply planning must account for water right priority, availability, and any applicable basin rules.
DUNGENESS RIVER BASIN REGULATIONS	Washington State Department of Ecology, 90.82 RCW, 173-518 WAC	Sequim is within the Dungeness portion of WRIA 18, where Ecology's rule addresses instream flows, groundwater appropriations, allocations, mitigation, compliance, and enforcement. The City's existing water rights are senior to the rule's instream-flow provisions, but this does not eliminate the City's responsibility to comply with the rule and other applicable water-resource requirements.
PUBLIC DRINKING WATER SYSTEM	Washington Department of Health; Chapter 70A.120 and 70A.125 RCW; 246-290 WAC	As an approved Group A public water system, the City must maintain an approved Water System Plan and demonstrate technical, managerial, and financial capacity; comply with drinking water quality, source protection, operations, monitoring, and planning requirements; and plan for its existing and proposed service area.
GROWTH MANAGEMENT ACT	Washington State Department of Commerce; 36.70A RCW	The Comprehensive Plan must plan for potable water supply and consider water-resource protection, including protection of the quality and quantity of groundwater used for public water supplies. Development must be supported by adequate public facilities and services at the time of occupancy or use, without reducing adopted service levels

Water Supply

Public comments express concerns regarding long-term water availability, groundwater withdrawal, and responsible aquifer management as the City plans for future housing and employment growth. The City's water supply planning evaluates both the amount of water the City is legally authorized to withdraw and the amount its existing sources can reliably produce. These are separate, but related, safeguards. Water rights establish the amount of water the City may legally withdraw, whereas the physical capacity of wells, pumps and source facilities establishes how much water can be delivered in practice.

The City has an existing annual water-right portfolio of 1,850 acre-feet per year, consisting of four water rights administered by the Washington State Department of Ecology. Those rights authorize:

- **Annual withdrawal volume (Qa):** up to 1,850 acre-feet per year, equivalent to approximately 602.8 million gallons annually; and
- **Instantaneous withdrawal rate (Qi):** up to 4,296 gallons per minute (gpm).

In 2024, the City withdrew approximately 384.5 million gallons, or approximately 1,180 acre-feet, from its sources. This represents approximately 64 percent of the City's authorized annual volume right. The City's 2024 peak-hour demand was approximately 2,400 gpm, or approximately 56 percent of its authorized instantaneous withdrawal rate. These figures are important because they show that the City is not presently withdrawing water at the limit of its authorized annual volume or peak withdrawal rate. The City's current water use remains below both state-authorized limits.

The City's water system is currently supplied by an infiltration gallery at the Ranney Well site, three groundwater wells at the Silberhorn well field, and three groundwater wells at the Port Williams well field. Together, these facilities have an installed pumping capacity of 3,113 gallons per minute (gpm): 718 gpm at Ranney Well, 635 gpm at Silberhorn, and 1,760 gpm at Port Williams. Although the City's installed source capacity is 3,113 gpm, Washington State Department of Health planning criteria require a reduction to reflect a maximum 20-hour pumping day. Under that requirement, the City's planning source capacity is 2,714 gpm. This adjusted capacity is estimated to serve approximately 11,970 Equivalent Residential Units (ERUs).

One ERU represents the average daily water demand of a typical single-family residence. This enables the City to account consistently for residential, multifamily, commercial, institutional, and other customers. Based on City metering data, one ERU has an average daily demand of 146 gallons per day. As of 2024, the City served 6,298 ERUs, including the allowance used to account for distribution-system leakage and non-revenue water. The 2025 Comprehensive Plan growth allocation anticipates approximately 3,000 additional residents over the planning period. Using the City's water-demand assumptions, this corresponds to an estimated 8,305 ERUs by 2045, which equates to approximately 73 percent of the City's currently authorized annual water volume. Therefore, existing water sources have sufficient capacity to serve the projected 20-year Comprehensive Plan demand, while retaining an estimated 35 percent margin above that projected demand, including an allowance for system leakage and non-revenue water.

In sum, the City's existing annual water rights, authorized instantaneous withdrawal rate, and adjusted source capacity are sufficient to serve the demand projected through 2045 under the Comprehensive

Plan growth allocation. It is at 85 percent capacity threshold that the City is required to begin planning for additional water capacity.

Nonetheless, the City recognizes that legal water rights and installed pumping capacity do not eliminate the need for careful groundwater stewardship. Responsible aquifer management requires the City to remain within its authorized withdrawal limits, track actual demand, monitor growth against adopted planning assumptions, and plan additional sources before demand approaches the limits of the existing system.

The City's water demand trends also show that conservation and system management matter. The current Water System Plan assumptions use an average daily demand of 146 gallons per ERU and a maximum daily demand of 333 gallons per ERU. Both are lower than the corresponding assumptions from the 2013 Water System Plan—163 gallons per ERU per day for average demand and 359 gallons per ERU per day for maximum daily demand—even though the system peak-hour demand calculation increased as population grew. The City Public Works staff attributes the lower per-ERU demand assumptions to conservation, reductions in distribution-system leakage and non-revenue water.

In addition, the City translates development into water demand that is accounted for. Each proposed development is translated into ERUs and added to the City's water demand total. The City maintains a water demand system model that is updated as development is approved and constructed, allowing staff to evaluate the cumulative effects of new demand, capital improvements, source changes, and other system conditions in real time.

The City is also required to maintain and periodically update its Water System Plan under Washington State Department of Health and Department of Ecology requirements. In addition, the Growth Management Act requires the City's Capital Facilities Plan to identify the public facilities needed to serve planned growth, evaluate available capacity, and plan for necessary capital improvements.

These planning requirements operate together with the City's ongoing water system management practices. The City updates its water system model as development projects are proposed and approved, identified capital improvements are prioritized through the six-year Capital Improvement Program and annual budget process, and updates systemwide water planning documents as required by the Department of Health, Department of Ecology, and the Growth Management Act.

Together, these processes provide the City with a reasonably accurate and continually updated understanding of water demand, available supply, source capacity, and future infrastructure needs. This allows the City to provide reliable water service to current residents while proactively identifying and planning for the water supply and system improvements to serve future growth.

Recent GMHB Decision

The City's approach to reviewing and applying its growth allocation, as described in Section 3.1.2 of this memo, is consistent with the Growth Management Hearings Board's decision in *Breske v. City of Seattle*. In that case, Seattle re-examined the capacity analysis in its 2019 Water System Plan as part of its Comprehensive Plan update to confirm that system capacity remained adequate under updated growth

assumptions. The Board found this re-examination sufficient because the City demonstrated that utility capacity remained adequate to serve the GMA growth assumptions.

Sequim followed a similar process. Its Water System Plan evaluated water-system capacity using a 3 percent population growth assumption, which is more conservative than the 1.3 percent growth assumption reflected in the City's 2045 population allocation. Section 6 of the Capital Facilities Plan (Appendix B-1) documents the City's evaluation of water-system capacity in light of the 2045 allocation.

As recognized in *Breske*, RCW 36.70A.070(3) is satisfied when a jurisdiction re-examines its infrastructure planning assumptions to confirm that capital facilities and utility capacity remain adequate to serve the applicable GMA growth allocation. The statute requires a system-wide evaluation of the minimum infrastructure needed to accommodate planned growth; it does not require the City to prepare an entirely new utility plan whenever the growth allocation is updated. Sequim's system-wide evaluation and its conclusion that water capacity remains adequate are documented in Section 6 of the Capital Facilities Plan.

Water Infrastructure, Capacity and Pressure
Public comments also raised concerns about whether the City's water infrastructure can maintain reliable service, adequate pressure, and fire protection as development occurs. Water infrastructure capacity involves more than the total amount of water available. It includes the ability of wells, pumps, storage reservoirs, pressure zones, water mains, and related facilities to reliably deliver water at the required pressure and flow at specific locations throughout the system.

The City evaluates these elements at both a systemwide and project-specific level. This approach recognizes that adequate overall water supply does not, by itself, guarantee that every location will have the same pressure, fire-flow capability, or pipe capacity. Those conditions can vary based on elevation, distance from reservoirs and pumping facilities, pipe size, pressure-zone boundaries, simultaneous demand, and the location and scale of new development.

Storage capacity is not evaluated only at the point of system failure. Department of Health guidance recommends beginning to evaluate infrastructure improvement when demand reaches approximately 85 percent of capacity. The City uses a more conservative internal planning threshold of approximately 75 percent of reservoir capacity, or about 2.0 MG, to begin planning for storage improvements.
The City has approximately 2.9 million gallons (MG) of total reservoir storage. Of that total, approximately 2.7 MG serves most of the City and is the volume used for system-capacity and growth analysis. Based on the current growth assumptions, this 75 percent threshold is associated with approximately 9,389 ERUs, which is expected to last close to but beyond the 2045 planning horizon.

Based on the Water System Plan's storage analysis, a service population of approximately 8,472 people requires about 1.54 MG or 57 percent of storage. With an estimated current population of approximately 8,400 people, the City's 2.7 MG of primary storage provides more than adequate storage capacity for the current population under Department of Health planning guidance.

Accordingly, the City does not identify an immediate reservoir storage deficiency for the 20-year Comprehensive Plan horizon. The City continues planning for future storage improvements as actual

growth and demand approach established planning thresholds. The timing and scale of future storage needs will depend on actual development, water use trends, source improvements, and system operating conditions.

Water pressure is a localized system-performance measure rather than a single citywide condition. Pressure at an individual property is influenced by the pressure zone serving the property, ground elevation, reservoir operating level, pump operation, water-main size, system demand, and the amount and location of new development. The City's water system operates through six pressure zones; the 350, 420, 480, 680, and 775 zones. These zones allow the City to manage water service across differing elevations and development areas while maintaining appropriate operating pressures.

The City's typical operating target is to maintain pressure at the point of service between 30 and 60 pounds per square inch (psi). The City also evaluates fire-flow performance, which is the ability of the water system to deliver sufficient flow for fire protection while maintaining adequate pressure. The stated residential fire-flow standard is generally 1,000 gpm at a residual pressure of 20 psi. The minimum fire-flow requirement for single-story and two-story residential fire operations is 500 gpm.

In addition to pressure and fire flow, the City evaluates distribution-system performance using criteria that include water velocity and water quality. Typical thresholds include:

Infrastructure measure	**Typical operating threshold**
Pressure at point of service	30–60 psi
Residential fire flow	1,000 gpm at 20 psi residual pressure
Minimum residential fire flow for one- and two-story operations	500 gpm
Water-main velocity	Not more than 10 feet per second
Chlorine residual at point of service	Not less than 0.2 milligrams per liter

These measures help ensure that system expansion does not adversely affect daily service, fire protection, pipe performance, or water quality.

Development Review and Required Mitigation
The City does not rely solely on the GMA growth forecasts when reviewing water infrastructure capacity. Every proposed development is evaluated for its anticipated water demand in ERUs, and that demand is added to the City's running system-demand total from the Water System Plan baseline. This enables the City to track whether development is occurring more slowly or more quickly than long-range projections assume.

The City also maintains a systemwide hydraulic model, which is updated as development projects are approved and built. The model allows the City to test how proposed development, capital improvements, system extensions, changes in source capacity, and other changes may affect water system performance. The analysis evaluates impacts such as pressure loss, fire-flow performance, water main sizing, and reservoir response under projected demand and loading conditions.

Before a development is approved, the City adds the proposal to its water system model and evaluates its systemwide impacts. If the analysis shows that the project would cause water service performance to fall below an acceptable operating threshold, mitigation will be required as a condition of approval. Depending on the specific location and system condition, mitigation may include water main upsizing, pump or booster improvements, storage improvements, pressure zone modifications, or other distribution system upgrades. If the developer does not mitigate the identified impact, the project is not approved.

Reclaimed Water

Washington State treats reclaimed water as a regulated resource rather than wastewater. The Washington State Department of Ecology and Department of Health jointly review proposed reclaimed-water systems and uses, and operating permits are issued only after both agencies' requirements have been met. State rules match treatment and operational requirements to the proposed use, include protections against cross-connections with drinking-water systems, require reliable treatment and backup processes, and provide for monitoring of facility performance. Water that does not meet treatment requirements is automatically diverted rather than delivered for reuse.

The City's reclaimed-water program is designed to put highly treated water to beneficial non-potable uses in accordance with the applicable State laws and regulations, while protecting public health, groundwater, and surface-water resources. At the City's Class A Water Reclamation Facility (WRF), wastewater undergoes advanced treatment that includes biological treatment, coagulation, filtration, ultraviolet disinfection, backup power, and alarm systems before it enters the City's purple-pipe distribution system. Class A reclaimed water is used for purposes such as irrigation and landscaping, playfield irrigation, toilet flushing, construction dust control, and summer augmentation of Bell Creek. These applications help preserve potable water supplies and reduce demands on freshwater resources during the dry season.

Ecology identifies groundwater recharge as one of the appropriate beneficial uses of reclaimed water, provided the use meets applicable State permitting and water quality requirements. In practical terms, recharge can supplement aquifer groundwater supplies and conserve higher quality drinking water for uses that require it; however, it must be planned and operated to protect groundwater quality, existing water rights, and public health. State requirements therefore provide the appropriate technical and regulatory framework for evaluating reclaimed water applications. Ecology notes that increasingly sensitive analytical methods can identify trace amounts of pharmaceuticals and other chemicals in many water environments, including reclaimed water, but that health based standards are not yet available for many such compounds. The City will continue to follow applicable permit, monitoring, and reporting requirements, and evaluate additional information or monitoring as state standards, scientific understanding, and feasible testing methods develop.

A revision to Climate and Resiliency Chapter 10 Policy CR-1.3 could be considered by the Planning Commission to clarify the role of Washington State Departments of Ecology and Health in reclaimed water:

> **Policy CR-1.3**: Support the expanded use of reclaimed water from its water reclamation system as a sustainable and climate-resilient resource. The City will prioritize water reuse for potable

and non-potable applications such as irrigation, landscaping, groundwater recharge, and environmental restoration, where technically and economically feasible and consistent with applicable state permits, water quality requirements, and protection of public health and the environment. Promote educational materials that highlight the benefits and safety of reclaimed-water use and help encourage its implementation in private development.

Additional Resources:
Reclaimed water - Washington State Department of Ecology
Water Reclamation and Reuse | Washington State Department of Health
Reclaimed Water | Sequim, WA - Official Website

Staff Recommendation:
Policy CR-1.3: Add clarifying language recognizing the role of Washington State Departments of Ecology and Health permitting and regulatory requirements for reclaimed water.

3.1.4 Sanitary Sewer

Responds to Public Comment #18

Wastewater Treatment Capacity and WRF Improvements
The Capital Facilities Plan (Appendix B-1) uses Sequim's 2045 GMA population allocation to estimate how much wastewater the community will generate as it grows. The City completed a wastewater-treatment capacity analysis to confirm that the sewer system and Water Reclamation Facility (WRF) can meet anticipated needs over the 20-year planning period, which is included as Appendix B-1A of the Draft Comprehensive Plan.

The analysis shows that the WRF is permitted to treat 1.67 million gallons per day (MGD). By 2045, the total average annual wastewater flow reaching the facility is projected to be about 1.20 MGD. As such, the City expects the facility to remain within its permitted flow capacity through 2045. The analysis also evaluated the expected amount of organic material and suspended solids in the wastewater, which are important measures of treatment capacity.

Overall, the sewer system is expected to operate satisfactorily during the 20-year planning period. However, the analysis identified future needs for certain sewer pipes, pump stations, and WRF equipment as growth occurs. Under the WRF's National Pollutant Discharge Elimination System (NPDES) permit, the City must begin planning for a treatment capacity expansion if actual monthly average flow or loading exceeds 85 percent of the applicable design capacity for three consecutive months. The projected wastewater flow, organic loading, and solids loading are expected to exceed 85 percent of the facility's permitted design capacity in 2046, 2044, and 2042, respectively. These years are projections – not actual exceedances – and the City is already taking steps well in advance of the earliest projected threshold in 2042 (85% planning threshold).

Appendix B-1A explains why the City is planning ahead to address these exceedances. The City has identified a series of WRF projects (identified as WRF-1 through WRF-5 in Table 4 of Appendix B-1A), to maintain reliability, improve solids handling, replace aging equipment, and prepare for future treatment capacity needs. These projects include aerobic digester and solids handling improvements. The City has

begun planning and seeking funding for WRF-1, the design of Phase 1 solids-handling improvements. This early work is intended to improve the reliability and capacity of the solids-handling system and position the City to meet future wastewater-service needs as Sequim grows.

Inflow and Infiltration

The Capital Facilities Plan recognizes that infiltration and inflow, commonly called I/I, are important considerations in operating and planning the City's sanitary sewer system. Infiltration is groundwater that enters sewer pipes through leaks, cracks, pipe joints, or other defects. Inflow is rainwater or surface water that enters the sewer system through improper connections, drainage structures, or leaking manhole covers. Because this water is not generated by homes or businesses, it can use sewer collection and treatment capacity without representing growth-related wastewater demand.

The City has initiated an I/I study to better characterize the I/I component of existing flows and identify where localized sources may be present. This is an appropriate asset-management and long-range planning effort. The study will provide more detailed, system-specific information to help prioritize future collection-system rehabilitation and I/I-reduction projects.

The fact that this study is underway should not be characterized as a shortcoming of the Comprehensive Plan or as evidence that the City lacks information about current I/I conditions. Appendix B-1A identifies I/I as a sewer-system planning consideration, includes a citywide I/I-reduction project in the long-range capital project list, and anticipates that the I/I study and future General Sewer Plan update will provide more detailed information for future rehabilitation planning. However, the City has substantial operational information to evaluate I/I conditions on a systemwide basis. The Water Reclamation Facility (WRF) continuously measures influent flow using an electromagnetic flow meter. Daily flow data are reported to the Washington State Department of Ecology through the City's National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Reports, and wet weather flow analysis, maximum-day flow analysis, and federal I/I screening criteria provide a reliable system level basis for evaluating current conditions.

For example, the City reviewed the measured WRF flow record from 2019 through 2025. This record shows that annual influent flow has remained generally stable. Higher flows occur periodically during the wetter months, generally from October through April, but these increases are intermittent and less pronounced than those commonly experienced in many Western Washington communities. Sequim's location in the Olympic rain shadow is an important factor. The area receives less precipitation than much of the Puget Sound region, resulting in a shorter wet weather period and a lower rainfall related response in wastewater flows.

For the Capital Facilities Plan's 2045 wastewater capacity analysis, the City used dry weather flows to project future wastewater demand associated with population and employment growth. This approach intentionally separates anticipated growth-related wastewater from flow that may result from groundwater or rainfall entering the sewer system. Historical flow patterns were then used to evaluate average annual, maximum monthly, and peak hour wastewater conditions for long-range planning.

The City also evaluated available operational data using federal I/I screening criteria. Under Title 40 CFR §35.2120(c), excessive infiltration is evaluated against a threshold of during high-groundwater

conditions. For Sequim, the high-groundwater period was evaluated as October through April. The City reviewed the highest seven day average flows during the wet seasons from 2023 through 2025. These wet-weather flows were a fraction of the federal excessive infiltration threshold, even before separating any potential rainfall-related inflow from the measured flows. Simply put, the available data does not indicate that groundwater infiltration is excessive under the applicable federal screening criterion. The City's collection system is performing well below that threshold.

The City also evaluated peak flows for potential excessive inflow. Under Title 40 CFR §35.2120(b), excessive inflow is defined as rainfall-related flow exceeding during storm events. The City reviewed maximum-day influent flow rates for 2023 through 2025, including the associated per-capita flow rates. None of the maximum-day flows exceeded 46 percent of the federal flow level used to identify excessive inflow. This is a conservative finding because the maximum-day flow values may include both groundwater infiltration and rainfall-related inflow. Even without separating those two sources, the City's observed peak flows remained well below the federal excessive inflow screening threshold.

Therefore, based on the available WRF flow-monitoring data, NPDES reporting, wet-weather and maximum-day flow analyses, and applicable federal screening criteria, the City's wastewater system does not exhibit excessive infiltration or excessive inflow. Sequim's relatively dry Olympic rain-shadow climate and the City's long-term measured flow record support the conclusion that I/I is not currently creating an excessive demand on WRF capacity.

The identified I/I study remains a prudent and valuable next step. It will help the City identify any localized sources of I/I, target future rehabilitation work, and prioritize capital investments. However, completing that study is not necessary to demonstrate that the Comprehensive Plan's Capital Facilities Plan has appropriately addressed sanitary sewer capacity or that the City has adequate system-level information for long-range planning.

Staff Recommendation: No revisions recommended for sanitary sewer.

3.1.5 Transportation

Responds to Comments #14, 19, 21, 22, 25, 28, 30, 32, 35

Traffic Conditions and Transportation Planning

Public comments raise concerns about traffic congestion, speeding, neighborhood safety, and the effect that additional housing and commercial development may have on Sequim's streets. Several comments specifically identify traffic conditions near South Seventh Avenue and Silberhorn Road, congestion on Washington Street, the Sequim Avenue/US-101 ramp area, and the need to ensure that transportation improvements keep pace with growth.

The 2026 Transportation Master Plan (TMP) (Appendix B-2) recognizes these concerns and uses current traffic data and future-growth projections to identify where improvements will be needed. The TMP does not conclude that traffic problems do not exist. Rather, it distinguishes between locations where people may experience queues or delays today and locations that do or are projected to fall below the City's adopted traffic operations level of service (LOS) standard.

The TMP is based on vehicle, pedestrian, and bicycle counts collected at key locations during the summer of 2023. It identifies midday, rather than the traditional morning or evening commute period, as Sequim's busiest travel period. This reflects the community's travel patterns, commercial activity, and visitor traffic. The TMP specifically acknowledges that Washington Street carries some of the highest traffic volumes in the City. During the midday peak hour, approximately 700 to 800 vehicles travel on Washington Street through portions of the west-end commercial area and downtown. The TMP also recognizes that queues occur throughout the year at the Washington Street and Sequim Avenue intersection and that summer events can create more substantial congestion, sometimes extending along Washington Street and toward US-101.

The TMP's traffic analysis found that the evaluated intersections currently operate within the City's adopted vehicle level-of-service standard. Level of service is a technical measure of vehicle delay at an intersection during a defined peak period. It does not mean that traffic is always free flowing, that queues never occur, or that residents will not experience congestion at specific locations or during festivals, seasonal peaks, construction activity, or other unusual conditions.

How the TMP Accounts for Future Growth
The TMP evaluates anticipated development and traffic conditions through 2045. It uses the City's GMA 2045 allocated population, housing and employment growth to estimate future travel demand and identify improvements needed to maintain the adopted vehicle level-of-service standard.

Based on the 2045 traffic model, the TMP identifies three intersections that will need improvements to meet the City's vehicle level-of-service standard:

- East Washington Street and Brown Road
- West Prairie Street and South Sequim Avenue
- US-101 ramps and South Sequim

These projects are included in the TMP transportation improvement program. The TMP also identifies the need for future roadway connections in areas with dead-end streets and cul-de-sacs. Better street connectivity can provide more than one route into and out of neighborhoods, reduce the concentration of traffic on streets, and improve access for emergency services, walking, bicycling, and local trips.

South 7th Avenue and Siberhorn Road
Comments regarding increased traffic and speeding near South Seventh Avenue and Silberhorn Road identify an important local safety concern. The TMP recognizes the need for a future Silberhorn Road and South Seventh Avenue intersection improvement, along with other transportation improvements in that area. The TMP establishes the long-range framework for identifying and funding transportation improvements needed. Speed enforcement, however, is primarily an operational matter addressed through law enforcement activity, traffic monitoring, and targeted safety measures.

New Development and Traffic Review
The Comprehensive Plan and TMP do not grant approval to individual development projects. Each proposed development remains subject to site specific project review. Depending on the size, location, and expected traffic generation of a proposal, that review may include transportation, access, safety,

and mitigation analysis. This process allows the City to evaluate site specific issues that cannot be fully identified at the Comprehensive Plan level, including driveway locations, internal circulation, pedestrian crossings, intersection operations, emergency access, and the improvements or mitigation needed for a particular project.

Regional Transportation Coordination
Some concerns involve facilities and services that extend beyond the City's direct authority, including US-101 ramp operations, regional highway access, ferry service, air connections, and transit service. The TMP addresses Sequim's transportation system within this larger regional context and calls for coordination with agencies such as the Washington State Department of Transportation, Clallam Transit, and regional transportation partners. The TMP identifies the US-101 ramps at South Sequim Avenue as a future capacity concern and includes a planned Sequim Avenue roundabout concept. WSDOT reviewed the TMP's multimodal approach and its evaluation of planned growth effects on US-101 and requested continued coordination on the Whitefeather/US-101 area.

Staff Recommendation: No revisions recommended for transportation.

3.1.6 Stormwater

Responds to Comments #6, 7, 8.A, 8.B, 8.C, 10, 15, 34, 35, 36 and 37

The City recognizes the importance of protecting local groundwater, streams, wetlands, and Sequim Bay from the effects of stormwater runoff. The Comprehensive Plan's Capital Facilities Plan, the City's 2016 Storm and Surface Water Master Plan, the Stormwater Management Needs Assessment and stormwater regulations adopted through the Sequim Municipal Code, provide the City's framework for identifying drainage concerns, planning capital improvements, and applying stormwater requirements to new development and redevelopment.

Washington State Department of Ecology 2024 Stormwater Management Manual for Western Washington is the State's current technical standard for stormwater management in Western Washington. It provides the methods used to determine which minimum requirements apply, how runoff must be evaluated, and how drainage, flow control, treatment, construction and maintenance measures must be designed. Ecology also recognizes that stormwater management must account for stie-specific conditions and continues to provide updated guidance as stormwater science and regulatory requirements evolve.

Sequim Municipal Code Chapter 13.104 adopts the 2024 Stormwater Management Manual. The City uses the current 2024 Manual when reviewing development projects; this code applies to land disturbing activities, discharges to drainage system or receiving waters, and proposed new development and redevelopment.

In practical terms, a proposed development must evaluate how it will manage stormwater generated by roofs, driveways, streets, parking areas, and other hard surfaces. Depending on the project and site conditions, the applicant may be required to prepare a stormwater site plan that addresses both:

- Construction-phase stormwater controls, which reduce erosion, sediment, and other pollutants while work is underway; and
- Permanent stormwater controls**,** which address runoff quantity and water quality after the project is built.

The City requires the use of stormwater best management practices, or BMPs, identified in the Ecology manual. BMPs can include measures such as preserving native vegetation, reducing unnecessary impervious surface, directing runoff to vegetated areas, bioretention facilities, biofiltration swales, detention or retention facilities, infiltration facilities where site conditions are suitable, and treatment practices that reduce pollutants before runoff leaves the site.

GMA Requirements
The Capital Facilities Plan's stormwater section meets the GMA capital facilities requirements. It identifies the City's existing stormwater and surface-water planning framework, including the Storm and Surface Water Master Plan, the Stormwater Management Needs Assessment, and the City's current stormwater regulations. These materials document existing system conditions, known drainage and water-quality needs, and the locations and types of improvements needed to address them. The Capital Facilities Plan uses these plans as adopted functional plans to identify future stormwater capital needs and includes applicable projects in the City's six-year Capital Facilities Plan with anticipated funding sources.

The stormwater section is also coordinated with the City's future land use plan because it recognizes that growth can increase impervious surface and runoff, requires development to comply with the City's adopted stormwater code and the current Washington State Department of Ecology Stormwater Management Manual for Western Washington, and identifies capital improvements to address future system needs.

City Planning for Existing Stormwater Needs
The 2014 Stormwater Management Needs Assessment identified existing drainage, ponding, flooding, culvert, conveyance, infiltration-facility, water-quality, maintenance, and operational needs. It was developed through reviewing existing conditions, staff and public reports, field inventories, technical information, and coordination with other affected parties.

The Needs Assessment identified specific existing issues, including undersized culverts and conveyances, localized ponding and runoff concerns, and facilities needing improvement or maintenance. It also recognized that Sequim receives relatively infrequent major storms but still has meaningful stormwater-management responsibilities related to property protection, traffic, water quality, groundwater resources, and protection of streams and habitat.

The 2016 Storm and Surface Water Master Plan was developed to address those identified needs. It serves as the City's strategic guide for stormwater and surface-water management, including proposed drainage and water-quality solutions, regulatory compliance actions, capital and operational improvements, and strategies for future growth and changing weather conditions.

Compliance and Enforcement

The City's stormwater regulations are designed to meet the applicable State stormwater management requirements and are codified in SMC 13.104. The municipal code requires City review and approval of regulated stormwater activities, use of applicable BMPs, construction and installation inspections, and enforcement when stormwater requirements are not met. The City may use compliance measures, stop-work orders, civil penalties, and recovery of investigation or correction costs when appropriate. Accordingly, new development is not allowed to disregard drainage, runoff, erosion, or water-quality impacts. Applicants must demonstrate compliance with the City's adopted requirements.

City and Regional Coordination
Some matters raised in comment letters involve broader watershed, irrigation, streamflow, salmon-recovery, groundwater, flooding, and regional drainage issues. These concerns are important; however, many extend beyond the City's municipal stormwater system and beyond the scope of a City Comprehensive Plan update.

The City recognizes that stormwater does not stop at city limits. Water moves through drainage basins that may include private properties, irrigation districts, Clallam County facilities, state highways, streams, ditches, wetlands, and receiving waters outside the City's ownership or regulatory authority. The Stormwater Management Needs Assessment specifically recognizes that Sequim receives runoff from other jurisdictions and that cooperation is needed to manage shared risks and water resources.

Similarly, the Storm and Surface Water Master Plan recognizes that portions of Sequim are within larger regional watersheds and that watershed planning is led by Clallam County and involves multiple agencies and stakeholders. The City participates in regional coordination and should continue to work with County, State, tribal, irrigation, watershed, and other partners where an issue crosses jurisdictional boundaries.

However, the City cannot resolve regional watershed management issues solely through its Comprehensive Plan. The City's role is to manage its own public stormwater infrastructure, apply stormwater requirements to development within City limits, identify and fund local capital needs, protect receiving waters to the extent of its authority, and coordinate with the responsible agencies and partners on regional issues.

Staff Recommendation: No revisions recommended for stormwater.

3.1.7 Revisions Identified:
1) **Additions to Policy CR-1.3**: Support the expanded use of reclaimed water from its water reclamation system as a sustainable and climate-resilient resource. The City will prioritize water reuse for potable and non-potable applications such as irrigation, landscaping, groundwater recharge, and environmental restoration, where technically and economically feasible and consistent with applicable state permits, water quality requirements, and protection of public health and the environment. Promote educational materials that highlight the benefits and safety of reclaimed-water use and help encourage its implementation in private development.

3.1.8 Staff Conclusions and Recommendations:

City Staff reviewed the issues raised and evaluated the relevant state law, recent Growth Management Hearings Board cases, draft Comprehensive Plan chapters and appendices, as well as applicable adopted plans and supporting documents. The existing draft policies, actions, and related materials are responsive to the issues identified. One revision to Policy CR-1.3 is recommended.

3.2 Housing and Growth

Responds to Public Comments #1, 2, 3, 5, 11, 14, 19, 20, 22, 23, 24, 27,28, 31, 32, 34, 38.A, 39, 41, 44, 61.C

GMA Context

Public comments reflect a shared concern that Sequim should accommodate needed housing without losing its small-city character, overwhelming public facilities, displacing existing residents, or placing all new growth in only one part of the community. The Draft Comprehensive Plan, Appendix A, and the Draft SMC Title 18 update work together to address those concerns.

Sequim is required under Washington's GMA framework to plan for population, housing, and employment growth allocated through Clallam County's countywide planning process. The Draft Plan identifies a planning allocation of 2,959 additional residents, 1,850 additional housing units, and 909 jobs by 2045 within the City. Importantly, this is only a planning requirement—not a prediction that every unit will be built, a commitment that the market will produce that level of growth, or an automatic approval of any project.

The purpose of the Comprehensive Plan is to establish a long-range framework for where growth may occur, what types of development are appropriate, what public facilities will be needed, and what environmental and community-character protections apply. A specific subdivision, apartment complex, mixed-use project, or planned community must still go through separate City review before it may be built.

That project review applies the zoning code, infrastructure standards, utility requirements, transportation standards, stormwater requirements, critical areas regulations, environmental review, and other applicable laws. The Comprehensive Plan is therefore not a permit and does not authorize construction by itself.

As a planning document, the Draft Comprehensive Plan supports a balanced approach. It directs growth toward its residential and mixed-use areas, and areas that can be served efficiently by public facilities. It supports a walkable, well-designed community with neighborhood-scale mixed uses, a range of housing options, and transportation choices. This approach is consistent with the purpose of GMA's required Urban Growth Areas: concentrate urban development where urban services can be provided efficiently. The Draft Comprehensive Plan's approach helps preserve rural and natural areas outside the UGA.

Many comments emphasize that housing growth must be coordinated with water, sewer, transportation, stormwater, public safety, and other essential services. Draft Land Use Policy LU-1.4 states that the City will ensure necessary public services and capital facilities are provided through the development review process at adopted levels of service, consistent with State and local law.

This means a project is not evaluated only on whether housing is permitted on the site. It must also address the services needed to support the proposal. Depending on the project, this may include:

- Water supply, pressure, and fire flow;
- Wastewater collection and treatment capacity;
- Transportation access, safety, and mitigation;
- Stormwater collection, treatment, and flow control;
- Emergency access and public safety;
- Sidewalks, bicycle facilities, and other public improvements; and
- Critical area requirements.

The GMA requires the Comprehensive Plan to coordinate land use with capital facilities. The City must identify existing public facilities, forecast future needs, identify needed improvements, provide at least a six-year financing plan, and reassess land-use assumptions if probable funding is insufficient to provide necessary facilities. This is the purpose of the Capital Facilities Plan and the City's supporting functional plans for water, sanitary sewer, stormwater, transportation, parks, and other services. Development is also subject to project level review for utility capacity, transportation impacts, stormwater management, emergency access, and other applicable standards.

The GMA does not require every long-range capital improvement to be fully built before any new housing is approved. It requires the City to maintain a coordinated planning and financing program, apply adopted levels of service and transportation concurrency requirements, and ensure that development has adequate facilities or an enforceable means to provide them.

UGAs, Future Land Use and Zoning Maps
Responds to Public Comments #5, 51, 58 and comments at 9/1/2026 public hearing

The GMA establishes the framework for urban growth areas (UGAs). Under RCW 36.70A.110, Clallam County designates UGAs in consultation with the cities within the county, and each city must be included within a UGA. A UGA may include both incorporated city land and adjacent unincorporated land planned for urban growth. The GMA also recognizes that a UGA associated with a city, serves as future potential annexation areas. Therefore, the Sequim UGA includes the incorporated City of Sequim and associated unincorporated UGA lands that may be annexed in the future, both of which are included within the City's Future Land Use Map (FLUM).

The City's FLUM and zoning map serve different purposes. The FLUM is a comprehensive plan policy map that depicts the City's long-range intended pattern of land uses. GMA require comprehensive plans to include a future land-use map that identifies land-use designations, municipal and UGA boundaries. Zoning is different: it is the regulatory implementation of the Comprehensive Plan and relates to the development standards that will apply to property. Accordingly, the City zoning map regulates property within the incorporated city limits, while Clallam County's comprehensive plan, zoning map, development regulations, and permitting authority govern unincorporated property within the Sequim UGA unless and until that property is annexed.

Public comments question whether the City may identify a land use designation for property(ies) on the FLUM within an unincorporated Sequim UGA that differ from Clallam County's land designation for the

same property. The question relates to five parcels proposed for a Regional Commercial (RC) designation on the City's FLUM; Clallam County is proposing a R-III designation for these parcels through its periodic comprehensive plan update process.

The proposed RC designation is a DCED Staff-initiated proposal. Staff brought this proposal to Planning Commission and City Council in early 2026 and explained its rationality is based on a property owner (Schaafsma) redesignation request to have their parcel changed from RC to Community Mixed Use (CMU) at the west end of Washington Street. Staff supports the property owner's redesignation request because the site is not as well suited for Regional Commercial as it is for Community Mixed Use due to its size and location, and the requested redesignation is consistent with early visioning results that favored mixed use "hubs" at the ends of Washington Street. However, the RC zone is an important zone to provide core retail services for the greater Sequim area and employment opportunities. With that in mind, the 5 parcels proposed for redesignation were identified to be a suitable location for future RC zoned parcels due to their proximity to existing RC uses and because they are of adequate size for the RC's allowed uses.[1]

The City's proposed RC is a FLUM designation and not depicted on the City's zoning map which is also a component of the City's periodic update. The FLUM designation does not change the current development rights of the properties, superseded County zoning or authorize the City to regulate property outside of its municipal boundaries. While the properties remain unincorporated, Clallam County's authority governs. The City's Future Land Use Map identifies the City's intended land use for these properties if and when they are annexed into Sequim. This distinction between planning for possible future annexation is recognized in RCW 35A.14.330, which authorizes code cities to prepare proposed zoning for territory reasonably expected to be annexed (i.e. unincorporated UGAs), with such zoning becoming effective upon annexation. Sequim's approach to this authority, is identified in the Draft Comprehensive Plan's Land Use Policy LU-9.5: "Land Use Designations have been identified on the City's Future Land Use Map for unincorporated Sequim UGA areas and are intended to provide the zoning for property upon annexation**."**

The City has evaluated the FLUM as part of the overall periodic update, including proposed site-specific map changes, and presented the draft plan and revisions to the Planning Commission as part of the public process. The GMA requires a broadly disseminated public-participation program with opportunities for comment, public meetings following effective notice, and consideration and response to public comments. It does not establish a requirement to provide individual mailed notice to every property owner within the City or unincorporated UGAs for site-specific FLUM amendment considered through a periodic comprehensive plan update.

Housing Obligations Under the GMA

Washington's recently updated housing legislation requires the City to plan for housing affordable to households at all income levels, including extremely low-income, very low-income, low-income, moderate-income, and above-moderate-income households. This is why Appendices A-1 through A-4 evaluate housing need by income range and why the Housing Chapter addresses a broad range of

[1]The property owners are aware of the staff-recommended redesignation and have expressed their support of the RC designation (Public Comment #27).

housing choices. The City is expected to identify and address barriers to housing production, consider housing needs for all economic segments of the population, and plan for emergency housing, emergency shelters, permanent supportive housing, and other supportive housing needs where applicable.

The GMA's housing requirements do not prohibit higher-income or market-rate housing. Rather, they require the City to avoid a land-use and regulatory framework that supplies only higher-cost housing while failing to create realistic opportunities for lower-cost, workforce, rental, senior, and supportive housing. The State's income-band allocations are therefore planning obligations, not caps on market-rate housing.

The Draft Housing Chapter recognizes that no single housing type or City policy will solve affordability. It establishes a framework to expand housing choice and capacity while also supporting tools more directly targeted to affordability. The Plan calls for:

- A sufficient supply and range of housing types and densities at all income levels;
- Removal of unnecessary regulatory barriers to housing;
- Housing choices near services, transportation, and daily needs;
- Accessory dwelling units, duplexes, townhomes, multiplexes, stacked flats, cluster housing, and mixed-use housing;
- Preservation of existing housing and manufactured-home parks as important sources of naturally occurring affordable housing;
- Partnerships with private developers, nonprofit organizations, housing authorities, and other providers;
- Consideration of tools such as multifamily tax exemptions, surplus public-land donations, affordable-housing levies or credits, land trusts, cooperative housing, and other funding mechanisms; and
- Dispersal of affordable housing opportunities throughout the City rather than concentrating them in one location.

The Plan also appropriately recognizes that households earning below 50 percent of area median income will often require subsidies, public funding, partnerships, land contributions, or other direct assistance. Expanding land capacity and allowing more housing choices can help, but zoning alone cannot ensure affordability at the deepest income levels.

Recent GMHB Decision
Responds to recent GMHB Case and Commissioner Fane comments

The Growth Management Hearings Board (GMHB) Final Decision and Order for *McGuire v. City of Port Townsend* GMHB Case 26-2-0017 (Aug. 19, 2026) reinforced that a jurisdiction's housing analysis must do more than demonstrate sufficient overall residential capacity. The City must document how its land use designations, development regulations and housing policies provide capacity to accommodate its allocated housing need at each income level.

The City engaged its housing consultant, Leland Consulting Group, to review Case No. 26-2-0017 and other relevant GMHB cases, and evaluate the housing planning materials it prepared for the City's 2025

Comprehensive Plan update, including Appendix A-1 Housing Needs Assessment, Appendix A-2 Adequate Provisions Analysis, Appendix A-3 Land Capacity Analysis and Appendix A-4 Racially Disparate Impacts Analysis. Leland Consulting has prepared a memorandum which is included as Exhibit 6B. The memorandum notes there are several GMHB cases decisions that emphasize the need for jurisdictions to demonstrate adequate housing capacity and feasible housing production across income band, rather than aggregating lower-income housing needs or relying solely on future policy direction.

The Leland Consulting Group memorandum describes enhancements to the Housing Appendices in response to GMHB decisions; their recommended revisions strengthen the City's Housing Needs Assessment, Land Capacity Analysis, Adequate Provisions Analysis, and Racially Disparate Impacts Assessment by more clearly addressing housing needs by income level, housing capacity, affordability tools, and displacement risks. Their recommended text additions identify sufficient planned capacity for lower income housing but notes that substantial public subsidy and coordinated funding will be necessary to meet the full need. The revisions to Appendices A-1 through A-4 follow the Leland Consulting Group's memorandum in Exhibit 6B.

Planning Commissioner Fane's Housing Comments
Planning Commissioner Fane provided written comments to the Commission at the 9/1/2026 public hearing, which were also forwarded to the Commission by email on 9/2/2026. Commissioner Fane's central housing concern is zoning capacity alone may not result in housing affordable at every income level. This is substantially recognized by the Leland Consulting Group's memorandum and proposed revisions to Appendices A. There is opportunity to consider policy revisions that strengthen the City's role in monitoring conditions, pursuing partnerships and evaluating available tools, while recognizing funding limitations. Potential revisions to housing policies in response to Commissioner Fane's comments are below:

- **Policy H-4.4:** Promote and encourage, and where feasible participate in, partnerships with private developers, property owners, nonprofit organizations and housing authorities, faith-based organizations and other providers to provide housing and home ownership opportunities for low- and moderate-income households, including shared or limited-equity housing, lease-purchase options, co-living, and land trusts and cooperatives.

- **Policy H-4.6:** Continuously evaluate ~~additional~~ local, state, federal, nonprofit and private-sector opportunities ~~options~~ to address affordable housing funding gaps, including as appropriate, ~~such as~~ an affordable housing property tax levy or credit, grants, fee reductions or credits, surplus land donation, multifamily tax exemption, infrastructure assistance and other authorized funding tools ~~as appropriate~~. Support low- and moderate- income housing funding opportunities through available non-profit, state, and federal programs.

- **Policy H-4.10:** Recognize ~~Acknowledge~~ that housing affordable to households ~~residential development that serves households~~ below 50% AMI will likely need assistance beyond market-rate development, such as direct government-assisted housing programs, subsidies or funding mechanisms, partnerships with affordable housing developers, and public or donated land contributions.

- **Policy H-6.3:** Review and update the City's permit procedures to improve permit timelines and minimize additional costs to housing provision. Evaluate the creation of pre-approved or permit-ready building plans and other administrative tools to facilitate lower-cost housing types, ensuring consistency with applicable health, safety, utility, installation and building code requirements. ~~building plans to incentivize desired housing types.~~

Planned Resort Community and Westbay-Related Comments
Responds to Comments #13, 14, 19, 20, 28, 32, 34, 42, 43, 45, 46, 47, 48, 49, 53, 54, 55, 56, 59, 61, 63.A, 63.B, 69 comments at 9/1/26 public hearing

Public comments express differing views about the Planned Resort Community designation and potential Westbay development. Some commenters support the planned community concept and its mix of residential, recreational, and commercial uses. Other commenters have concerns about affordability, infrastructure, traffic, environmental effects, shoreline conditions, and community character.

The Draft SMC Title 18 update identifies the Planned Resort Community zoning and stated purpose is to enable a planned resort community that may include a mix of year-round and seasonal residences, tourist accommodations, commercial uses, and supporting services. That designation does not approve a specific project, and a future project must be evaluated under the applicable zoning standards, including any required subdivision and/or site plan review, infrastructure, environmental, stormwater, critical area protections, shoreline requirements, and transportation analysis.

Healthcare on Olympic Peninsula
Responds to Comments #1, 14, 18, 21, 44, 47, 48, 50, 53, 55, 56, 59, comments at 9/1/26 public hearing

Written comments and hearing testimony identified significant concerns regarding the availability, convenience, continuity, and stability of healthcare and medical services on the Olympic Peninsula. The City recognizes that reliable access to primary, specialty, emergency, behavioral-health, and other medical services is important to the health, safety, and quality of life of Sequim residents and the surrounding region. However, the Draft Comprehensive Plan nor the City regulate healthcare provider operations, determine provider staffing or service availability, fund hospital or clinic operations, or control state and federal healthcare systems. Those responsibilities primarily rest with healthcare providers, public health agencies, state and federal agencies, and regional service partners.

The City can meaningfully support—but cannot independently deliver or guarantee—healthcare access through coordination, advocacy, land-use and infrastructure planning, emergency preparedness, and partnerships with providers and public agencies. Staff therefore recommend adding a new Capital Facilities Policy CF-1.2 supporting City coordination with healthcare, public-health, emergency medical service, Tribal, and regional partners as Sequim grows and as community needs change.

New Capital Facilities Policy CF-1.2: Coordinate with healthcare providers, public-health agencies, emergency medical-service providers, Tribal healthcare providers, and regional partners to support

healthcare and medical-service access needs associated with population growth, demographic change, emergency preparedness, and climate-related hazards.

3.2.1 Revisions Identified:

1) **Leland Consulting Recommended Revisions**: Exhibit 6B is the Leland Consulting Group Memorandum and recommended revisions to Appendices A-1 through A-4.
2) **Revisions to Housing Policies:** Revisions to Housing Policies H-4.4, H-4.6, H-4.10, and H-6.3
3) **New Capital Facilities Policy CF-1.2.**

3.2.2 Staff Conclusions and Recommendations:

City Staff reviewed the issues raised and evaluated relevant state law, recent Growth Management Hearings Board cases, draft Comprehensive Plan chapters and appendices, as well as applicable adopted plans and supporting documents. The existing draft policies, actions, and related materials are responsive to the issues identified. Revisions to Appendices A-1 through A-4 as recommended by Leland Consulting Group are included as Exhibit 6B to this memorandum. Revised Housing Policies are recommended to strengthen the City's role in housing production, especially for 50 percent AMI and below. And finally, a new policy in Chapter 6 Capital Facilities, CF-1.2 on coordination with healthcare providers is also recommended.

3.3 Critical Areas, Natural Environment and Climate

Responds to Comments #2, 4, 5, 13, 14, 16, 17, 18, 25, 26, 28, 29, 31, 32, 33, 38.A, 38.B, 39 and 57

Many public comments raise concerns about wetlands, wildlife habitat, migratory birds, aquifer recharge, stream and salmon habitat, flooding, geologic hazards, tree retention, climate change, and the potential cumulative effects of growth. The Draft 2025 Comprehensive Plan responds to these subjects through its Natural Environment and Climate and Resilience chapters, supported by the City's existing critical areas regulations and site specific project review procedures.

The Comprehensive Plan does not serve as or replace the City's Critical Areas Ordinance, stormwater regulations, shoreline regulations, SEPA review, or project-level regulatory and environmental review. Those implementation tools apply enforceable requirements to individual development proposals. The Plan explains that environmental impacts are minimized primarily through regulations, while restoration and enhancement often occur through partnerships, incentives, and voluntary programs.

Critical Areas Ordinance

The City's current Critical Areas Ordinance (CAO), Chapter 18.80 SMC, remains in effect and continues to apply to development proposals. It regulates wetlands, streams and stream corridors, frequently flooded areas, geologically hazardous areas, fish and wildlife habitat conservation areas, locally unique features—including ravines, marine bluffs, and beaches—and critical aquifer recharge areas. *(Note, as part of the Draft SMC Title 18 Update, the current Chapter 18.80 will be retained and in a new section of the SMC – Title 16).*

The City's critical area maps are used to identify potential concerns and alert applicants and the public. The actual location and extent of a critical area must be confirmed through site specific review and through qualified professional studies. The City may require information addressing drainage, surface

and groundwater conditions, water quality, flooding, slopes, vegetation, wetlands, aquifer recharge, and off-site effects before allowing construction, clearing, or grading to proceed.

Where critical areas or buffers are present, the City's code requires special studies, and mitigation, monitoring measures, and financial assurances when appropriate. Wetlands, streams, ravines, fish and wildlife habitat areas, and required buffers must remain undisturbed unless a specific code exception applies. Critical area tracts, notices on title, and permanent identification measures may also be required as conditions of development approval. The City's CAO update will occur in 2027 and will follow GMA direction and Washington State Department of Commerce Guidance. This future work does not mean that critical area protections are absent in the meantime. Existing requirements remain enforceable, and development proposals continue to be reviewed under the Critical Areas Ordinance standards and other applicable State and Federal regulations.

In addition, critical area protections are an important component of Sequim's climate resilience framework, but they are not the City's only climate planning response. Sequim is not among the jurisdictions required to prepare a greenhouse gas emissions reduction sub-element under RCW 36.70A.095. The resiliency sub-element, however, is required for cities planning under GMA. Sequim addresses resilience in Chapter 10 of its Draft Comprehensive Plan, developed using Washington State Department of Commerce climate planning guidance. Chapter 10 addresses climate-related hazards and community resilience, including through coordination with the Clallam County Multi-Jurisdictional Hazard Mitigation Plan, in which the City participates. Commerce reviewed the City's Climate Chapter and provided no comments.

Natural Environment Chapter
The Natural Environment Chapter establishes the City's policy framework for protecting ecosystems while planning for required urban growth. It recognizes that Sequim's streams, hillsides, prairies, shorelines, wetlands, and other natural features are integral to the community's character and quality of life. Its central policy direction is to protect critical areas, habitat, and the natural environment through land-use planning, management plans, development regulations, park planning, and site specific project review.

The Plan specifically calls for the City to maintain a CAO that protects wetlands, critical aquifer recharge areas, frequently flooded areas, fish and wildlife habitat conservation areas, and geologically hazardous areas. It further provides that the City's critical area standards must use appropriate and applicable Best Available Science and give special consideration to conservation and protection measures for anadromous fisheries. The Plan also supports coordination with state and federal agencies, Tribes, environmental organizations, and other partners; environmentally sensitive site design; and voluntary stewardship, restoration, and enhancement of critical areas and buffers on public and private land.

Climate and Resilience Chapter
The Climate and Resilience Chapter responds to recent GMA requirements for local governments to integrate climate-resilience planning into their comprehensive plans. The Chapter identifies the City's participation in the 2024 Clallam County Multi-Jurisdictional Hazard Mitigation Plan process and uses that regional work to inform Sequim's assessment of climate related risks.

The Plan identifies hazards that may be made more significant by climate change, including flooding, drought, landslides, sea-level rise, severe weather, and wildfire. Its policies address water conservation, stormwater practices, system maintenance, reclaimed-water use, climate-appropriate landscaping, sustainable water management, ecosystem protection, and coordination with regional partners.

The County's Multi-Jurisdictional Hazard Mitigation Plan provides an additional regional framework for reducing vulnerability to hazards such as earthquakes, drought, power outages, and wildfires. FEMA notified the County on July 14, 2025, that the 2024 plan met applicable FEMA mitigation-planning requirements, subject to adoption by participating jurisdictions. Sequim participated in the regional planning process alongside Clallam County, other cities, Tribes, fire districts, and other governmental and community partners, and adopted the Multi-Jurisdictional Hazard Mitigation Plan on October 27, 2025 (Resolution 2025-029).

Vegetation Management in Public Parks
Responds to Commissioner Fane comments

Parks and Open Space Policy POS-4.8 in the Draft Comprehensive Plan appropriately supports Commissioner Fane's suggestion to include a policy minimizing pesticide use on City-owned land. City Public Works reports its vegetation management practices include prioritizing bee-friendly products, utilization of non-chemical vinegar and soap treatments near sensitive areas such as creeks and wetlands, and posts site specific notices when spraying occurs, particularly near schools and parks. These practices reflect an approach that balances effective vegetation management with protection of public health, pollinators, and water resources, while providing practical public awareness of applications. An addition to Policy POS-4.8 reflective of Public Works current practices could be considered by the Planning Commission:

> **Policy POS-4.8:** Limit the use of pesticides for vegetation management in public parks and open spaces as appropriate, and encourage integrated pest-management practices, use of the lest-toxic effective methods where practicable, and environmentally sensitive application and maintenance practices.

Mr. Worthington Comments
Responds to Comments #6, 7, 8.A, 8.B, 8.C, 10, 15, 36 and 37

Mr. Worthington's comments raise wide ranging concerns regarding the Dungeness River watershed, Johnson Creek, Bell Creek, regional drainage and flood conveyance, U.S. Highway 101 stormwater, sediment, groundwater recharge, salmon recovery, irrigation infrastructure, historic restoration actions, interagency coordination, technical review, and proposed flood control and habitat restoration concepts.

The City acknowledges the importance of protecting watershed health, reducing flood risk, managing stormwater, protecting fish and wildlife habitat, and coordinating with other affected jurisdictions, Tribes, state agencies, and the public. The Draft Comprehensive Plan addresses these matters at the policy level through its Land Use, Transportation, Capital Facilities, Natural Environment, Climate and Resilience, and Public Involvement elements. Relevant policies include:

Land Use Policies LU-1.4 through LU-1.5; Goal LU-11 and Policies LU-11.1 through LU-11.3; and Goal LU-12 and Policies LU-12.1 through LU-12.3, addressing the relationship among growth, public facilities, environmental constraints, critical areas, natural resources, and coordination with other jurisdictions and service providers;

Capital Facilities Policies CF-1.1, CF-2.1, CF-3.1 through CF-3.3, and CF-6.1 through CF-6.4, addressing capital facilities planning, utility and infrastructure capacity, stormwater and drainage needs, functional plans, capital projects programming and financing, and coordination of growth with facility capacity;

Natural Environment Goals NE-1, NE-3, NE-4, and NE-6, including Policies NE-1.1 through NE-1.5; NE-3.1 through NE-3.4; NE-4.1 through NE-4.3; and NE-6.1 through NE-6.6, addressing Best Available Science, watershed health, fish and wildlife habitat, wetlands and riparian areas, groundwater recharge, stormwater, erosion and sediment control, floodplain protection, restoration, and coordination with resource agencies and Tribal governments;

Climate and Resilience Policies CR-1.1 through CR-1.4, CR-2.1, CR-4.1 through CR-4.4, CR-5.1, and CR-8.3, addressing climate related hazards, flood resilience, protection of public and private property, water-resource protection, hazard-mitigation planning, and regional coordination;

Transportation Policy TR-8.1, addressing coordination on transportation facilities and infrastructure, including facilities affecting City circulation and development; and

Public Involvement Policies PI-1.1 through PI-2.5, addressing public participation, communication, and coordination with affected agencies and community partners.

Appendix B-1, the Capital Facilities Plan, provides the related capital planning framework. It identifies stormwater as a capital facilities function and relies on the City's Storm and Surface Water Master Plan and Stormwater Management Needs Assessment as functional plans. The Capital Facilities Plan identifies long range needs and a six-year Capital Improvement Program, but it is not intended to make project level hydrologic determinations for regional drainage basins or to replace stormwater planning, engineering design, environmental review, or permitting processes.

The comments also request or advocate specific engineering concepts and regional actions, including creek diversions, drainage-routing changes, channel configuration, flood conveyance facilities, sediment management measures, highway drainage improvements, habitat restoration designs, interlocal agreements, technical review processes, and hearing schedules. The Comprehensive Plan update is not the process through which the City can technically evaluate, select, fund, permit, or implement a specific multi-jurisdictional flood control or habitat restoration alternative. Those actions would require appropriately scoped engineering and environmental analysis; participation by affected property owners and responsible agencies; identification of funding; and applicable local, state, federal, and Tribal review and permitting.

Many of the facilities, drainage areas, waterways, and decisions identified in the comments are owned, controlled, regulated, funded, or influenced by entities other than the City. Depending on the location and proposal, implementation could require participation by Clallam County, the Washington State Department of Transportation, the Washington State Department of Ecology, Washington State Department of Fish and Wildlife, the Jamestown S'Klallam Tribe, irrigation districts, private property owners, and their respective regulatory and permitting requirements. The City may coordinate with these entities within its authority and available resources, but the Comprehensive Plan cannot independently require another jurisdiction or agency to undertake a particular project, technical study, funding commitment, or regulatory action.

The City's responsibilities include managing its municipal stormwater system; applying adopted stormwater, critical areas, grading, and development review requirements within city limits; identifying, prioritizing and funding City capital projects; and coordinating with responsible agencies where drainage basins, highways, streams, irrigation infrastructure, habitat, or flood risks cross jurisdictional boundaries. The Draft Comprehensive Plan, Capital Facilities Plan, and implementing development regulations provide the policy and regulatory framework for those responsibilities.

3.3.1 Revisions Identified:

1) **Revision to Policy POS-4.8**: Limit the use of pesticides for vegetation management in public parks and open spaces as appropriate, and encourage integrated pest-management practices, use of the lest-toxic effective methods where practicable, and environmentally sensitive application and maintenance practices.

3.3.2 Staff Conclusions and Recommendations:

City Staff reviewed the issues raised and evaluated relevant state law, draft Comprehensive Plan chapters and appendices, as well as applicable adopted plans and supporting documents. The existing draft policies, actions, and related materials are responsive to the issues identified. One revision to Policy POS-4.8 is recommended.

3.4 Specific Comments on Comprehensive Plan/SMC Title 18 Text

Responds to Comments #2, 16, 25, 26, 38.A, 38.B, 39, 41, 50, 57, 60, 62, 64, 66

In addition to the broader policy issues addressed in Sections 3.1 through 3.3, public and agency comments include specific requests to revise individual Comprehensive Plan goals, policies, maps, text, and provisions of SMC Title 18. This section will report the submitted public comments requesting text changes and staff analysis and recommendations.

In evaluating proposed amendments, staff considered whether the requested revision:

- Is consistent with the Growth Management Act and other applicable state law;
- Is consistent with the overall goals and policy direction of the Draft Comprehensive Plan;
- Improves clarity, accuracy, or consistency;
- Is already addressed through Comprehensive Plan policy or development regulations;
- Duplicates a provision already contained elsewhere in the municipal code;
- Is supported by the record developed for the periodic update; and

- Is within the scope of the current periodic update or is more appropriately addressed through a subsequent regulatory, functional planning, or project-specific process.

To assist the Planning Commission during their deliberations, a companion document to this memo, a Deliberations and Motion Memo, has been prepared. In that document, proposed revisions to the July 13, 2026 Draft Comprehensive Plan and Draft SMC Title 18 are consolidated and organized. These revisions include those identified in this memo, as well as revisions included in Exhibits F and G of the September 1, 2026 Planning Commission Public Hearing Staff Report. The tables below identify the specific public or agency comment, summarize the requested revision, and staff response to the suggested revisions. Actual revisions in strikeout and underline are presented with the Deliberations and Motion Memo.

Public or Agency Comment #	Comment Requested Revision	Staff Analysis/Recommendation
Public Comment #2	Requests in Chapter 9 Natural Environment, Policies NE-1.5 and NE-6.3 support for wildlife and migratory birds.	Responsive Revision Recommended. Chapter 9 Natural Environment, Policies NE-1.5 and NE-6.3 support for wildlife and migratory birds.
Agency Comments #16 DNR	Generally, supports the Plan but recommends clearer discussion of critical areas in Land Use and Parks/Open Space, better integration of hazard/climate planning, and clarification of the Geologic Hazard Areas map and terminology. Notes that substantive CAO provisions will be reviewed during the later CAO update.	Responsive Revisions Recommended. Land Use: Add to 2.1 Plan Context to include reference to critical area protection and climate resilience chapters. Parks and Open Space: add to Policy POS-2.6 reference to critical areas. Natural Environment: clarify note for Figure NE-2 to identify that Areas of Geologic Concern are included on the Figure.
Public Comment #25	Requested revisions call for enforceable protections, independent review, transparent data, and stronger environmental, infrastructure, and habitat standards.	Many requested changes are addressed currently in development regulations than as comprehensive plan policies. However, there are opportunities to strengthen several policies which are recommended.
Public Comment #26	Proposes revisions to LU-12.3, Section 9.2.2 for typographic errors, Section 10.2.2 and Policy CR-1.2	Responsive Revisions Recommended. Specific recommended revisions in Exhibit A of PC Deliberations and Motion Memo.
Public Comment #38.A	Suggests numerous revisions/edits to Comprehensive Plan policies regarding: landscaping, utility easements, stormwater infiltration, water conservation education, community character, housing terminology, litter, wetlands/bays, migratory birds, and grammar/typographical corrections	Responsive Revisions Recommended. Specific recommended revisions in Exhibit A of PC Deliberations and Motion Memo.
Public Comment #39	Suggests numerous revisions to Comprehensive Plan policies regarding: housing, groundwater, drought-tolerant landscaping, pest-management practices,	Responsive Revisions Recommended. Specific recommended revisions in Exhibit A of PC Deliberations and Motion Memo.

Agency Comment #57 WDFW	Department suggests revisions to Comprehensive Plan policies specifically focused on critical areas, wildlife connectivity to reduce habitat fragmentation and salmon recovery plans.	Responsive Revisions Recommended. Specific recommended revisions in Exhibit A of PC Deliberations and Motion Memo.
Public Comments #60, 62, 64	Comments #60 and 62 – Delete Policy CR-1.3 Comment #64 – Delete "groundwater recharge" from Policy CR-1.3	Responsive Revisions Recommended; identified in Section 3.1.3 of this Memo is recommended.
Commissioner Fane's Comments	Commissioner Fane submitted written comments to Planning Commission at 9/1/2026 Public Hearing. Comments relate to vegetation management treatments in public parks and open spaces and housing capacity and provision.	Commissioner Fane's comments are addressed in this Memo on pages 21-23 for housing and pages 25-26 for vegetation management.

3.4.1.B Draft SMC Title 18

Public Comment #	Comment Requested Revision	Staff Analysis/Recommendation
Public Comment #38.B	Suggests changes to Ch. 18.60 Master Plan Overlay concerning bicycle impacts, lighting, clarity of permitted use restrictions, and definition of the "life of the project."	Responsive revisions recommended, regarding bicycle impacts, clarified permitted uses and life of project. Specific recommended revisions in Exhibit B of PC Deliberations and Motion Memo.
Public Comment #41	Requesting revisions within Draft Title 18: to allow 50-foot PRC building heights, limit the 25-foot single-family height cap to areas within 100 feet of neighboring residential zones, exempt certain architectural features, and allow alternate parking standards supported by professional studies. The letter also recommends clear, objective criteria for determining when alternate master plan standards are	Responsive revisions recommended, regarding height, architectural features, criteria for alternative master plan standards. Specific recommended revisions in Exhibit B of PC Deliberations and Motion Memo.

	"equal or superior," while maintaining protections for critical areas, concurrency, adjacent properties, and the public.	
Public Comment #50	Cites concerns in Title 18 Zoning Code regarding "18.100.010 Authority and Purpose." Proposes issues related to homeless should be handled through the government and not by churches. Specifically cites issues related to a local church food box and trash that is in the surrounding area.	No revisions proposed, as amendments to GMA require inclusion of these standards in development regulations.
Public Comment #66	Interest in introducing "satellite bedrooms concepts/ideas" into the zoning code as an alternative to Additional Dwelling Units (ADUs).	No revisions proposed. Detached bedrooms are allowed and must meet applicable building code.

4 Summary of Recommended Revisions

Staff recommends a set of revisions to the Draft 2025 Comprehensive Plan and Appendices A in response to public and agency comments. The recommended changes are intended to clarify and strengthen the Plan's existing policy framework rather than alter its overall land use, growth, infrastructure, environmental protection, or housing approach.

Recommended revisions include clarifying the role of state permitting and public-health protections in the City's reclaimed-water policy; strengthening Housing Element policies related to partnerships, affordable housing funding opportunities, housing needs across the income spectrum, and administrative tools that may reduce housing-development costs; and adding a policy supporting coordination with healthcare and regional service providers as the community grows. Staff also recommend revisions to the Housing Appendices to further document housing needs, land capacity, adequate provisions, affordability tools, and displacement considerations consistent with recent Growth Management Hearings Board decisions.

Additional recommended revisions clarify the City's integrated pest-management direction for public parks and open spaces. Finally, there are proposed amendments to specific Comprehensive Plan text and Title 18 development regulations that were suggested through public and agency comments that have are recommended because they improve clarity, consistency or accuracy.

5 Conclusion

The public comments received since the July 13, 2026 release of the Draft Comprehensive Plan and during the September 1, 2026 Planning Commission Public Hearing, reflect a consistent underlying concern: as Sequim grows, how will the City protect the qualities that residents value, ensure that infrastructure and essential services keep pace, and turn Comprehensive Plan policies into meaningful action?

The Draft 2025 Comprehensive Plan responds to those concerns through an integrated framework rather than through any single policy or project. The Plan directs future growth through the Future Land Use Map; establishes policies for housing, transportation, parks and open space, natural environment, economic development, public facilities and utilities, and climate resiliency; and provides the policy basis for implementing regulations and capital investment decisions. Draft SMC Title 18 provides the regulatory tools for implementation, including zoning, development standards, site design requirements, landscaping and open space requirements, and project review criteria.

Appendix B-1, the Capital Facilities Plan, connects anticipated growth to planning for City facilities and services. It identifies long-range capital needs, references adopted levels of service and establishes a six-year Capital Improvement Program that is reviewed and updated through the City's annual budget process. The Capital Facilities Plan addresses City systems such as water, sewer, transportation, stormwater, parks, public buildings, while also recognizing the need for coordination with independent service providers, including fire and emergency medical services and schools.

To assist the Planning Commission during their deliberations, a companion document to this memo, a Deliberations and Motion Memo, has been prepared. In that document, proposed revisions to the July

13, 2026 Draft Comprehensive Plan and Draft SMC Title 18 are consolidated and organized. These revisions include those identified in this memo, as well as revisions included in Exhibits F and G of the September 1, 2026 Planning Commission Public Hearing Staff Report.

6 Exhibits

6A Confluence Law Legal Memo, dated September 25, 2026
6B Leland Consulting Group Memo, dated September 22, 2026