EXHIBIT C

City of Sequim 2025 Comprehensive Plan Update

Updated Draft Supplemental Environmental Impact Statement (DSEIS) and Final Supplemental Environmental Impact Statement (FSEIS)

Updated Draft Supplemental Environmental Impact Statement **2**

Final Supplemental Environmental Impact Statement **169**

City of Sequim 2025 Comprehensive Plan Update

DRAFT
Supplemental Environmental Impact Statement

July 13, 2026

Editorial Corrections Notice – October 12, 2026
This document incorporates editorial corrections to the Draft Supplemental Environmental Impact Statement (DSEIS) originally issued July 13, 2026. Corrections include the table of contents, chapter and subsection numbering, and figure and table numbering. These corrections are editorial in nature and do not modify any text of environmental analysis, alternatives, mitigation measures, or conclusions presented in the July 13, 2026 DSEIS. The corrections are documented in the Final Supplemental Environmental Impact Statement (FSEIS).

JAMESTOWN S'KLALLAM TRIBE LAND ACKNOWLEDGMENT

The land that we know as Sequim [sxʷčkʷíyəŋ "soo-ch-kwee-ing"] was once inhabited solely by first peoples known as the S'Klallam [nəxʷsƛ̓áyəm'"new-sklai-yem"] People, represented by the three Tribal Governments, Lower Elwha Klallam, Jamestown S'Klallam and Port Gamble S'Klallam. We serve as stewards of the land within the City of Sequim with the same care and consideration the S'Klallam / Klallam Tribes has and continues to provide. This acknowledgement is a respect to the S'Klallam People and their history.

ANCESTRAL LANDS OF THE COAST SALISH

Sequim is located in the traditional aboriginal territory of the Coast Salish peoples, who live around the Salish Sea in what is now Washington State and the Canadian province of British Columbia. The Coast Salish Tribes have lived here since time immemorial and while each tribe is unique, all share in having a deep historical connection and legacy of respect for the land and natural resources. These sovereign tribal nations enrich the region through environmental stewardship, cultural heritage, and economic development, and collaborate with local governments to shape the region's future.

Contents

Cover Letter 4

Fact Sheet 5

Notification of Availability/Distribution List 9

1 Summary 10

2 Proposal and Alternatives 27

3 Affected Environment, Impacts and Mitigation Measures 55

4 Appendix A 163

5 References/Bibliography 167

Cover Letter

July 13, 2026

Subject: City of Sequim 2025 Comprehensive Plan Update Draft Supplemental Environmental Impact Statement (Draft SEIS or DSEIS)

Dear Reader:

The City of Sequim has prepared the attached Draft SEIS to analyze the potential impacts associated with adopting the City's 2025 Comprehensive Plan. The City prepared the 2025 Comprehensive Plan to satisfy requirements of the Growth Management Act (GMA; RCW 36.70A). This Draft SEIS is intended to satisfy the requirements of the State Environmental Policy Act (SEPA; RCW 43.21C).

The GMA calls for communities to review and, if necessary, revise their comprehensive plans and regulations every ten (10) years to ensure they remain up-to-date (RCW 36.70A.130). The proposed adoption of the Sequim Comprehensive Plan by the Sequim City Council constitutes a non-project action requiring SEPA.

Two alternatives are examined in the Draft SEIS:

- No Action: No Action, Current 2015 Comprehensive Plan
- Action Alternative: Adopt 2025 Periodic Update of the Comprehensive Plan, including all elements, appendices and development regulations.

The Draft SEIS supplements and will adopt the following previously issued SEPA documents:

- Sequim Comprehensive Plan, Final EIS, July 1996
- Sequim Comprehensive Plan Update, Determination of Nonsignificance and associated SEPA Checklist, June 2006

The City of Sequim is requesting comments from citizens, agencies, affected tribes, and all interested parties on the DSEIS from July 13, 2026, to August 13, 2026. **Comments are due by 4:00 p.m. on Thursday, August 13, 2026**. Please see the Fact Sheet for methods to submit comments.

The DSEIS and more information are available on the project website at: 2025 Comprehensive Plan | Sequim, WA - Official Website

Thank you for your interest in the Sequim 2025 Comprehensive Plan Periodic Update.

Sincerely,

Karla Boughton, Director
Community and Economic Development Director and SEPA Responsible Official
City of Sequim

Fact Sheet

Project Title

City of Sequim 2025 Comprehensive Plan Update Draft Supplemental Environmental Impact Statement (Draft SEIS or DSEIS)

Proposed Action and Alternatives Considered

The City of Sequim is updating its citywide comprehensive plan ("the comprehensive plan") consistent with the Growth Management Act (GMA; RCW 36.70A). The comprehensive plan is designed to implement the City's long-term vision, values, and priorities for land use, growth management, and provision of public services and infrastructure. The comprehensive plan:

- Acknowledges the population, housing, and employment growth allocations to the City of Sequim to prevent sprawl in rural areas and deliver public services and infrastructure efficiently.
- Addresses housing needs for all economic segments of the population, supporting a variety of housing options and lifestyles to accommodate all ages, incomes, and household types.
- Supports economic development to foster a thriving business environment that retains small businesses, attracts larger employers, and encourages innovation.
- Conserves open space and resource lands and protects the natural environment and cultural and historic resources.
- Expands transportation choice and connectivity with safe, efficient multimodal options.
- Incorporates climate change planning and enhances community resilience to more effectively respond to natural hazards that are increasing in frequency and intensity.

Consistent with current GMA standards, the 2025 Comprehensive Plan update extends the planning horizon year to 2045; accommodates new population, housing, and jobs allocations; assures adequate capacity for housing at all income levels; updates policies to address racially disparate impacts; and supports investments in multimodal transportation, utilities, public services and facilities, and parks. Pursuant to the GMA, the plan is also consistent with Clallam County's Countywide Planning Policies (CPPs).

This DSEIS is intended to satisfy requirements of the State Environmental Policy Act (SEPA) to analyze proposals and identify potential environmental impacts resulting from decisions made by an agency. Two alternatives are examined in this DSEIS:

- **No Action Alternative**. The No Action Alternative is required under SEPA. This alternative retains the current 2015 Sequim Comprehensive Plan and assumes no changes to the plan structure, the future land use plan, adopted policies, or zoning

regulations. The No Action Alternative has adequate land capacity to meet total housing and job allocations but does not sufficiently address housing capacity by income bands and does not fully meet new GMA requirements for a periodic update.

- **Proposed Action Alternative.** The Proposed Action consists of the City of Sequim 2025 Draft Comprehensive Plan and associated amendments to Title 18 of the Sequim Municipal Code (SMC). The Proposed Action represents the City's periodic update under the Washington Growth Management Act (GMA) and updates Comprehensive Plan goals, policies, future land use designations, and development regulations to accommodate projected growth through the 2045 planning horizon. The Proposed Action provides sufficient land capacity to accommodate adopted population, housing, and employment growth allocations, including housing needs across all income levels, while incorporating recent state legislative requirements related to housing, multimodal transportation, climate planning and resilience, and other planning policy updates. The accompanying amendments to Title 18 SMC implement the updated Comprehensive Plan and ensure consistency with current state law, as well as targeted procedural, substantive, and formatting revisions that clarify the City's development regulations.

Proponent, Lead Agency, SEPA Responsible Official, and Contact Person

The Proponent and Lead Agency is the City of Sequim.

For questions, comments, and additional information, contact:
Karla Boughton, Director and SEPA Responsible Official

Community and Economic Development Department
City of Sequim
152 W Cedar Street
Sequim, WA 98382
DCED@sequimwa.gov | (360) 683-4908

Location

All incorporated areas of City of Sequim

Tentative Date of Final Action

Fall 2026

Required Approvals

The proposal will be reviewed by the Sequim Planning Commission and considered for action and adoption by the Sequim City Council. The proposal will be reviewed by the Washington State Department of Commerce for a 60-day period prior to City action.

Principal Authors and Contributors

The Draft EIS has been prepared under the direction of the Sequim Planning and Economic Development Department.

Consultants:

Otak – Principal Authors
The Leland Group – Land Use + Housing
Wilson Engineering – Water
RH2 - Sanitary Sewer
Transpo Group – Transportation
Herrera Environmental – Storm and Surface Water

Contributors:

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Katie Cole, P.E. Project Engineer
Austin Wagner, Project Engineer
Amy Doughtery, Business Assets Senior Manager
Meggan Uecker, Resource Analyst

Draft SEIS

Date of Issuance: July 13, 2026

Comment Period Ends: August 13, 2026

Draft SEIS Comment Period

This DSEIS has a 30-day public comment period pursuant to WAC 197-11-502(5)(b). The City of Sequim is requesting comments from residents, agencies, affected tribes, and all interested parties on the DSEIS from July 13, 2026 to August 13, 2026. **Comments are due by 4:00 p.m. on August 13, 2026. Submittal of comments by email is preferred.** Please include the subject line "Sequim Draft SEIS Comments" and include your comments in the body of the email rather than as an attachment if possible. Email: planningdept@sequimwa.gov.

All written comments via US Mail should be directed to:
City of Sequim Community and Economic Development Department
152 W Cedar Street
Sequim, WA 98382

Availability of Draft SEIS

This DSEIS is available for review at Sequim Community and Economic Development, 2nd floor of the Sequim Civic Center 152 W Cedar Street, Sequim, WA 98382 and at the Sequim Library 630 N Sequim Avenue, Sequim, WA 98382.

The DSEIS is posted on the City's website: 2025 Comprehensive Plan | Sequim, WA - Official Website.

Subsequent Environmental Review

A Final Supplemental Environmental Impact Statement (Final SEIS or FSEIS) will be prepared for the proposal. The Final SEIS will revise the Draft SEIS as appropriate and respond to comments as required in WAC 197-11-560.

Phased Environmental Review

Phased review of the proposal pursuant to WAC 197-11-060(5) is anticipated. Phased review assists agencies and the public to focus on issues that are ready for decision and exclude from consideration issues already decided or not yet ready for decision. In phased review, broader environmental documents, such as this DSEIS, may be followed by narrower documents that incorporate prior general discussion by reference and concentrate solely on the issues specific to that phase of the proposal.

Adoption of Previous Related Environmental Documents

Since 1996, the City of Sequim has issued the following environmental review documents regarding the City of Sequim Comprehensive Plan:

- Sequim Comprehensive Plan, Final EIS, July 1996
- Sequim Comprehensive Plan Update, Determination of Nonsignificance and associated SEPA Checklist, June 2006

Background Information Reference Material

Background information, reference material, and other documents related to this proposal can be found on the project website at 2025 Comprehensive Plan | Sequim, WA - Official Website

Notification of Availability/Distribution List

Federal and Tribal Agencies

Jamestown S'Klallam Tribe
U.S. Department of Energy – Pacific Northwest National Laboratory (PNNL)
U.S. Army Corps of Engineers

State and Regional Agencies

Department of Commerce
Department of Archaeology and Historic Preservation
Department of Ecology
Department of Fish and Wildlife
Department of Transportation
Olympic Region Clear Air Agency (ORCAA)

Local and Regional Jurisdictions/Agencies

Clallam County
Clallam Transit
City of Port Angeles
City of Port Townsend
Jefferson County
Port of Port Angeles
Clallam County Fire District #3 Fire District
Sequim School District

Utilities

Clallam County Public Utilities District

Media

Peninsula Daily News
Sequim Gazette
KSQM
KONP

Community Organizations and Individuals

2025 Comprehensive Plan Update email list.

1 Summary

1.1 Overview

The City of Sequim is updating its citywide comprehensive plan ("the comprehensive plan") consistent with the Growth Management Act (GMA; RCW 36.70A). The comprehensive plan is designed to implement the City's long-term vision, values, and priorities for land use, growth management, and provision of public services and infrastructure. The comprehensive plan:

- Acknowledges the population, housing, and employment growth allocations to the City of Sequim to prevent sprawl in rural areas and deliver public services and infrastructure efficiently.
- Addresses housing needs for all economic segments of the population, supporting a variety of housing options and lifestyles to accommodate all ages, incomes, and household types.
- Supports economic development to foster a thriving business environment that retains small businesses, attracts larger employers, and encourages innovation.
- Conserves open space and resource lands and protects the natural environment and cultural and historic resources.
- Expands transportation choice and connectivity with safe, efficient multimodal options.
- Incorporates climate change planning and enhances community resilience to more effectively respond to natural hazards that are increasing in frequency and intensity.

Consistent with current GMA standards, the 2025 Comprehensive Plan update extends the planning horizon year to 2045; accommodates new population, housing, and jobs allocations; assures adequate capacity for housing at all income levels; updates policies to address racially disparate impacts; and supports investments in multimodal transportation, utilities, public services and facilities, and parks. Pursuant to the GMA, the plan is also consistent with Clallam County's Countywide Planning Policies (CPPs).

This DSEIS is intended to satisfy requirements of the State Environmental Policy Act (SEPA) to analyze proposals and identify potential environmental impacts resulting from decisions made by an agency. Two alternatives are examined in this DSEIS:

- **No Action Alternative**. The No Action Alternative is required under SEPA. This alternative retains the current 2015 Sequim Comprehensive Plan and assumes no changes to the plan structure, the future land use plan, adopted policies, or zoning regulations. The No Action Alternative has adequate land capacity to meet total housing and job allocations but does not sufficiently address housing capacity by income bands and does not fully meet new GMA requirements for a periodic update.

- **Proposed Action Alternative.** The Proposed Action consists of the City of Sequim 2025 Draft Comprehensive Plan and associated amendments to Title 18 of the Sequim Municipal Code (SMC). The Proposed Action represents the City's periodic update under the Washington Growth Management Act (GMA) and updates Comprehensive Plan goals, policies, future land use designations, and development regulations to accommodate projected growth through the 2045 planning horizon. The Proposed Action provides sufficient land capacity to accommodate adopted population, housing, and employment growth allocations, including housing needs across all income levels, while incorporating recent state legislative requirements related to housing, multi-modal transportation, climate planning and resilience, and other planning policy updates. The accompanying amendments to SMC Title 18 implement the updated Comprehensive Plan and ensure consistency with current state law, as well as targeted procedural, substantive, and formatting revisions that clarify the City's development regulations.

1.2 Study Area

The study area includes all land within the City of Sequim corporate city limits, approximately 3,500 acres and 6.37 square miles.

1.3 Objectives, Proposal, and Alternatives

1.3.1 Objectives and Proposal

SEPA requires a statement of proposal objectives and the purpose and need to which the proposal is responding. The primary objective and need for this proposal is to complete the 2025 periodic update of the Sequim Comprehensive Plan to meet Growth Management Act requirements, and

- Demonstrate capacity to accommodate housing and jobs growth allocations through 2045.
- Meet legislative requirements for housing by income levels and variety of housing types.
- Support economic development and business for prosperous community and economic vitality.
- Support transit, non-motorized and other alternative transportation modes through appropriate housing choices, employment opportunities, and multimodal transportation infrastructure.
- Ensure that public services, multimodal transportation infrastructure and capital facilities can be efficiently and effectively provided to support forecast development at appropriate levels of service.
- Enhance access to parks, recreation, and cultural amenities.

1.3.2 Alternatives

Two alternatives are examined in this DSEIS:

No Action Alternative. The No Action Alternative is required under SEPA. This alternative retains the current 2015 Sequim Comprehensive Plan and assumes no changes to the plan structure, the future land use plan, adopted policies, or zoning regulations. The No Action Alternative has adequate land capacity to meet total housing and job allocations but does not sufficiently address housing capacity by income bands and does not fully meet new GMA requirements for a periodic update.

Proposed Action Alternative. The Proposed Action consists of the City of Sequim 2025 Draft Comprehensive Plan and associated amendments to Title 18 of the Sequim Municipal Code (SMC). The Proposed Action represents the City's periodic update under the Washington Growth Management Act (GMA) and updates Comprehensive Plan goals, policies, future land use designations, and development regulations to accommodate projected growth through the 2045 planning horizon. The Proposed Action provides sufficient land capacity to accommodate adopted population, housing, and employment growth allocations, including housing needs across all income levels, while incorporating recent state legislative requirements related to housing, multimodal transportation, climate planning and resilience, and other planning policy updates. The accompanying amendments to Title 18 SMC implement the updated Comprehensive Plan and ensure consistency with current state law, as well as targeted procedural, substantive, and formatting revisions that clarify the City's development regulations.

1.3.3 Comparison of Alternatives

Table 1.3.3-1 Overview of Alternatives Studied in Draft SEIS

Component	Impacts Common to Both Alternatives	Impacts of the No Action Alternative	Impacts of the Proposed Action Alternative
Consistency with Plans and Policies			
GMA Compliance		The No Action Alternative is partially consistent with the GMA. The No Action Alternative does not comply with recent changes in planning for housing, multi-modal transportation, or climate change.	The Proposed Action Alternative was developed to comply with current GMA standards for comprehensive plans, including amendments related to planning for housing, multimodal transportation, and climate change.
Clallam County CPPs Compliance		The No Action Alternative was developed and adopted prior to the 2018 CPPs. There are no known or apparent conflicts between the 2018 CPPs and the 2015 Comprehensive Plan.	The Proposed Action Alternative referenced the 2018 CPPs and was developed to be consistent with the CPPs.
Plan Format and Structure			
Comprehensive Plan Elements		The No Action Alternative includes 11 Element chapters. The chapters address the minimum GMA requirements for elements of a comprehensive plan but does not include required Climate and Resiliency or updated Capital Facilities Plan.	The Proposed Action Alternative includes required GMA elements including Climate and Resiliency, and optional Community Character and Natural Environment Chapters. Also includes in Appendix required Housing related components – Housing Needs Assessment, Adequate Provisions, Land Capacity Analysis and Racially Disparate Impacts. Includes an updated Capital Facilities Plan and Transportation Master Plan.
General Vision Concept		The 2015 Comprehensive plan represents a vision for concentrated urban density in Sequim's downtown core, surrounded by regional commercial and employment uses and detached residential development.	The 2025 Comprehensive Plan update builds on 2015 principals and expands sustainable, mixed-use growth, walkability, and a connected transportation network. It also highlights civic engagement, economic vitality, and community resilience as key elements of Sequim's future identity.

Component	Impacts Common to Both Alternatives	Impacts of the No Action Alternative	Impacts of the Proposed Action Alternative
Land Use and Zoning			
Future Land Use Map and Zoning	Development will continue, expanding housing supply and employment opportunities as vacant and underutilized parcels are developed or redeveloped.	No significant change.	Development will continue, expanding housing supply and employment opportunities as vacant and underutilized parcels are developed or redeveloped. Includes several redesignation/rezoning of site specific parcels.
Growth Allocations, Land Capacity and Housing Income Needs		Adequate land for housing and jobs growth allocations, but land capacity does not sufficiently meet GMA for addressing a full range of affordability levels, and does not include a housing needs assessment, adequate provision, or racially disparate impacts analysis.	Sufficient land for housing and jobs, and provides adequate capacity at the full range of income levels, addresses middle housing, and reduces racially disparate impacts as required.
Natural Environment			
Critical Areas	Development and growth of the City will impact critical areas with both Alternatives; however, critical areas are protected through the City's Critical Area Ordinance.		
Shorelines	Alternative will see changes to the shoreline environment as the City grows, does not propose increased intensity in the shoreline district. Regulation will be through Shoreline Master Program.		
Climate and Hazard Mitigation		The No Action Alternative does not include an assessment of the hazards applicable to the City, nor measures the City's vulnerability consistent with the most recent Clallam County Hazard Mitigation Plan.	The Action Alternative includes Climate and Resiliency Chapter, providing mitigation actions and policies to decrease the City's vulnerability to climate-related hazards.
Water Quality and Surface Runoff	Both alternatives will see an increase in development and impervious surfaces. New developments are		

Component	Impacts Common to Both Alternatives	Impacts of the No Action Alternative	Impacts of the Proposed Action Alternative
	regulated through the City's and DOE's stormwater regulations.		
Air Quality	Both alternatives will see increase vehicle miles traveled, construction activity, and energy use, which may contribute to localized increases in air emissions. Existing federal, state, and local air quality regulations will continue to apply.	The No Action Alternative does not include updated policies addressing climate change, multi-modal transportation, or strategies to reduce vehicle dependence and associated emissions.	The Proposed Action Alternative includes updated policies supporting multimodal transportation, compact growth patterns, and climate resilience strategies that may reduce long-term air quality impacts associated with growth.
Housing			
Housing Diversity		The No Action Alternative provides for limited housing choices and opportunities.	The Action Alternative provides for wider variety of housing typologies and expanded opportunities for mixed use residential.
Housing Affordability		The No Action Alternative does not address housing affordability required through GMA.	The Action Alternative has evaluated housing income levels as required by GMA in Housing Needs Assessment and Land Capacity Analysis.
Displacement Risk	Both alternatives have minimal risk in potential displacement.		
Transportation			
Vehicles		The No Action Alternative does not identify transportation improvement projects needed to address GMA growth allocation.	Updated LOS analysis and list of transportation improvement projects included in Capital Facilities Plan and updated Transportation Master Plan.
Active Transportation		The No Action Alternative does not identify active transportation improvement projects needed to address GMA growth allocation and respond to HB 1181 requirement for active transportation.	The Action Alternative includes list of projects in the Capital Facilities Plan and updated Transportation Master Plan to address the lack of connections in the active transportation network.
Public Services and Utilities			
Fire and Emergency Services	Current trends are causing the Fire District to make changes and possibly add an additional firehouse. Both Alternatives will increase the need for these changes.		

Component	Impacts Common to Both Alternatives	Impacts of the No Action Alternative	Impacts of the Proposed Action Alternative
Police	Both Alternatives will require additional police services to accommodate the anticipated population growth.		
Parks and Recreation	Both Alternatives will require additional park amenities to meet Parks and Open Space Plan's level of service standards.	The No Action Alternative does not identify needed park improvement projects.	The Action Alternative includes an updated list of projects in the Capital Facilities Plan to address additional park needs based upon GMA growth forecast.
City-Operated Utilities	Both Alternatives will increase demand to the City's sanitary sewer, water, and stormwater systems.	The No Action Alternative does not identify needed utilities' improvement projects.	The Action Alternative includes an updated list of projects in the Capital Facilities Plan to address needed infrastructure to accommodate GMA growth forecast.
Third-Party Utilities	Both Alternatives will increase demand for third-party provided utility services; however, all third-party providers have strategic plans to accommodate increased demand on a larger scale.		
Historic and Cultural Resources			
Historic and Cultural Resources	Growth and redevelopment under both alternatives have the potential to affect known or previously unidentified historic, archaeological, or cultural resources. Existing federal, state, and local regulations require review and protection measures when applicable.	The No Action Alternative relies on existing policies and regulations, which provide protection for known resources.	The Action Alternative updates the Comprehensive Plan policies to better recognize historic preservation, cultural resources, and coordination with applicable Tribal, state, and federal requirements.
Development Regulations			
Development Regulations	Development will continue as vacant and underutilized parcels are developed or redeveloped. Development is required to follow adopted zoning, engineering, and permitting requirements.	No significant change.	Proposed Draft Title 18 amendments address statutory requirements under GMA and state legislature related to housing and parking; provides for modernization, formatting and clarifications.

1.4 SEPA Process

Under SEPA, an EIS or SEIS provides the City, members of the public, and other agencies with information about how a project proposal may affect the natural and built environment. This disclosure allows for meaningful comment, consideration of potential alternatives, and well-informed decision-making.

This SEIS analyzes environmental impacts as appropriate to the general nature of a comprehensive plan update. The adoption of comprehensive plans or other long-range planning approvals is a non-project (i.e., programmatic) action under SEPA. A non-project action is defined in WAC 197-11-774 and WAC 197-11-704 as an action which is different or broader than a single site-specific project, such as decisions on policies, plans, and programs, including comprehensive plans and zoning ordinances.

1.4.1 Draft SEIS

This Draft SEIS identifies environmental conditions, potential impacts, and measures to reduce or mitigate any unavoidable adverse impacts that could result from the 2025 Comprehensive Plan Update. This DSEIS evaluates each of the following topics for the three alternatives:

Natural Environment

- Natural and Critical Areas
- Air Quality
- Climate and Hazard Mitigation

Built Environment

- Land Use
- Plans and Policies
- Housing
- Transportation
- Public Services and Utilities
- Historic and Cultural Resources

Public and agency comments are invited on this Draft SEIS. Written are invited during the 30-day public comment period following issuance. Public comments will be considered and addressed in the Final SEIS. Please see the Fact Sheet at the beginning of this Draft SEIS for the dates of the public comment period.

1.4.2 Level of Analysis

The proposal is to perform the periodic update of the City of Sequim Comprehensive Plan as required by the GMA. Under SEPA, this proposal is considered a "non-project" proposal. As defined in WAC 197-11-774, "non-project" means "actions which are different or broader than a single site-specific project, such as plans, policies, and programs." For non-project proposals, SEPA allows for more flexibility in EIS preparation because "there is normally less

detailed information available on their environmental impacts and on any subsequent project proposals." Further, for such proposals, impacts and alternatives are to be discussed "in the level of detail appropriate to the scope of the non-project proposal and to the level of planning for the proposal." Site specific analyses are not required (WAC 197-11-442).

There are existing environmental documents being adopted, but do not fully address all probable significant adverse environmental impacts or updated circumstances associated with the 2025 Comprehensive Plan and Development Regulations proposal. Accordingly, the City is using the adopted documents together with this Supplemental Environmental Impact Statement.

1.4.3 Final SEIS

A Final Supplemental Environmental Impact Statement (Final SEIS or FSEIS) will be prepared for the proposal. The Final SEIS will revise the Draft SEIS as appropriate and respond to comments as required in WAC 197-11-560.

1.4.4 Adoption of Previous SEPA Documents

Since 1996, the City of Sequim has issued the following environmental review documents regarding the City of Sequim Comprehensive Plan:

- Sequim Comprehensive Plan, Final EIS, July 1996
- Sequim Comprehensive Plan Update, Determination of Nonsignificance and associated SEPA Checklist, June 2006

SEPA allows the use of prior environmental documents (WAC 197-11-600) and preparation of supplemental environmental documents (WAC 197-11-620). The City may rely on part of or all prior documents and update past information to consider new alternatives or information.

This Draft SEIS supplements the following previously issued SEPA documents:

- Sequim Comprehensive Plan, Final EIS, July 1996
- Sequim Comprehensive Plan Update, Determination of Nonsignificance and associated SEPA Checklist, June 2006

The Draft SEIS supplements the adopted environmental document(s) identified above and addresses those probable significant adverse environmental impacts, updated conditions, and reasonable alternatives not fully analyzed in the previously prepared environmental document(s).

1.4.5 Phased Review

Phased review of the proposal pursuant to WAC 197-11-060(5) is anticipated. Phased review assists agencies and the public to focus on issues that are ready for decision and exclude from consideration issues already decided or not yet ready. In phased review, broader

environmental documents, such as this SEIS, may be followed by narrower documents that incorporate prior general discussion by reference and concentrate solely on the issues specific to that phase of the proposal.

1.5 Key Issues and Options

Both alternatives result in increased housing and employment growth that will lead to some changes to the natural environment, land use, housing, transportation, and public services and utilities. Prior to the development of the Final SEIS, the following issues are anticipated to be resolved:

- Selection and refinement of the City's preferred alternative
- Ability to provide more efficient growth patterns that support multimodal travel
- Providing housing capacity for all income levels
- Level of service needed for transportation, public services and utilities needed to support land use and growth levels.

1.6 Summary of Impacts and Mitigation Measures

This section summarizes the results of the Alternatives' evaluation in Chapter 2. For details of the evaluation, please see Chapter 2.

Table 1.6-1 Summary of Alternatives' Evaluation

Environmental Element	No Action Alternative	Action Alternative	Mitigation Measures	Significant Unavoidable Impact
Natural Environment and Critical Areas	The No Action Alternative would continue to accommodate future population and employment growth under the existing 2015 Comprehensive Plan and development regulations. As urban development occurs, additional impervious surfaces, vegetation removal, and habitat fragmentation would incrementally affect the natural environment. Future development could result in localized impacts to wetlands, streams, fish and wildlife habitat conservation areas, frequently flooded areas, geologically hazardous areas, and critical aquifer recharge areas; however, development would remain subject to the City's Critical Areas Ordinance, Shoreline Master Program, state and federal permitting requirements, and project-level environmental review. Although environmental protections would continue to apply, the No Action Alternative would not incorporate updated planning policies that further integrate natural resource protection with current Growth Management Act requirements.	The Action Alternative accommodates substantially the same long-term growth while improving coordination between future land use planning and protection of natural resources. The updated Comprehensive Plan strengthens policies supporting critical area protection, open space preservation, habitat connectivity, low-impact development, stormwater management, and environmental stewardship. Site-specific land use redesignations were evaluated at a programmatic level, with future development remaining subject to phased SEPA review and applicable environmental regulations. Because development under the Action Alternative continues to occur within the City's urban growth area and under existing critical area protections, no significant adverse impacts to natural resources are anticipated beyond those associated with planned urban growth.	• City of Sequim Critical Areas Ordinance • Shoreline Master Program • State and federal environmental permitting requirements • Stormwater management regulations and best management practices • Low Impact Development (LID) standards • Native vegetation preservation and landscaping requirements • Project-level SEPA review and phased environmental review • Updated Comprehensive Plan policies promoting habitat conservation, open space protection, and environmental stewardship	Impacts associated with continued urbanization are anticipated under both alternatives, including incremental increases in impervious surface and localized habitat modification. However, existing environmental regulations, mitigation measures, and project-level review substantially avoid or minimize adverse impacts. No significant unavoidable adverse impacts to the natural environment or critical areas are anticipated.

Environmental Element	No Action Alternative	Action Alternative	Mitigation Measures	Significant Unavoidable Impact
Air Quality	The No Action Alternative would accommodate future growth under the existing Comprehensive Plan, resulting in incremental increases in vehicle travel, residential and commercial energy use, and temporary construction-related emissions. Existing federal, state, and local air quality regulations would continue to limit emissions from construction activities, industrial sources, and motor vehicles. Although growth would contribute to increased emissions over time, regional air quality is expected to remain within applicable regulatory standards.	The Action Alternative would accommodate similar long-term growth while incorporating updated policies that support compact urban development, multi-modal transportation, pedestrian and bicycle connectivity, transit opportunities, and reductions in per-capita vehicle miles traveled consistent with recent Growth Management Act amendments. The Action Alternative improves the City's ability to reduce transportation-related emissions over time by encouraging land use patterns and transportation investments that support alternatives to single-occupant vehicle travel. Air quality impacts associated with future development remain subject to existing regulatory requirements.	• Federal and Washington State air quality regulations • Construction best management practices for dust suppression and emissions control • Transportation demand management strategies • Multimodal transportation improvements identified in the Transportation Master Plan • Bicycle and pedestrian infrastructure improvements • Transit-supportive land use policies • Compact development patterns that reduce vehicle miles traveled	Minor unavoidable increases in greenhouse gas and criteria pollutant emissions are anticipated as a consequence of projected population and employment growth under both alternatives. These increases are regional in nature and are not expected to result in violations of applicable air quality standards. No significant unavoidable adverse air quality impacts are anticipated.
Climate and Hazard Mitigation	Under the No Action Alternative, future growth would continue to contribute to greenhouse gas emissions, increased energy consumption, and greater exposure to climate-related hazards such as drought, wildfire, flooding, severe storms, and extreme heat. Although the City would continue implementing the adopted Multi-Jurisdictional Hazard Mitigation Plan and other existing emergency management programs, the 2015 Comprehensive Plan does not include the Climate Change and Resiliency Element now required	The Action Alternative incorporates the new Climate and Resiliency Element required under current Growth Management Act standards and integrates climate considerations throughout the Comprehensive Plan. The updated policies support compact urban development, multi-modal transportation, water conservation, energy-efficient development, urban forestry, open space preservation, and investments that improve community resilience to natural hazards. The Action Alternative is coordinated with the adopted Multi-	• Climate Change and Resiliency Element of the Comprehensive Plan • Clallam County Multi-Jurisdictional Hazard Mitigation Plan • Updated Transportation Master Plan promoting multi-modal transportation • Urban forestry and open space preservation policies • Low Impact Development and stormwater management standards	Moderate unavoidable impacts associated with climate change and regional population growth are anticipated under both alternatives. These impacts result from broader environmental conditions beyond the City's control. However, the Action Alternative substantially improves climate resilience, hazard preparedness, and long-term

Environmental Element	No Action Alternative	Action Alternative	Mitigation Measures	Significant Unavoidable Impact
	under the Growth Management Act. Consequently, the No Action Alternative would not fully integrate climate adaptation, greenhouse gas reduction, environmental justice, or resilience planning into future land use, transportation, infrastructure, and capital investment decisions.	Jurisdictional Hazard Mitigation Plan and updated capital facility planning, improving the City's ability to anticipate, prepare for, and respond to climate-related risks while supporting long-term reductions in greenhouse gas emissions.	• Energy-efficient and sustainable development practices • Emergency preparedness and hazard response planning • Continued implementation of federal, state, and local environmental regulations	greenhouse gas reduction through updated policies, coordinated planning, and implementation of the new Climate and Resiliency Element.
Land Use	The No Action Alternative would retain the 2015 Comprehensive Plan, Future Land Use Map, and implementing development regulations. Although the existing plan contains sufficient overall land capacity to accommodate projected growth, it does not fully reflect current Growth Management Act requirements, updated housing needs, or revised population, employment, and housing allocations through 2045. Existing land use designations and zoning regulations would continue to guide future development; however, the plan would not incorporate updated planning policies, revised land use designations, or zoning amendments intended to improve development flexibility, support housing diversity, or respond to changing community needs. Future development would continue to occur through project-specific review under existing regulations.	The Action Alternative updates the Comprehensive Plan, Future Land Use Map, and SMC Title 18 development regulations to accommodate projected growth through 2045. The proposal incorporates updated housing allocations, revised land use designations, targeted zoning amendments, and site-specific redesignations that improve opportunities for housing, mixed-use development, economic development, and public facilities. The updated plan also strengthens consistency between land use, transportation, utilities, parks, and capital facilities planning, ensuring future growth occurs in areas where public infrastructure can be efficiently provided.	• Updated Comprehensive Plan land use policies • Future Land Use Map and Title 18 zoning regulations • Development standards and design requirements • Critical Areas Ordinance and Shoreline Master Program • Capital Facilities Plan • Transportation concurrency requirements • Project-level SEPA review and phased environmental review • Future permit processes compliance with development regulations	Future growth and redevelopment are expected within the city limits consistent with the Growth Management Act. While urban development will gradually convert vacant and underutilized lands to urban uses, the Action Alternative improves the coordination of land use, infrastructure, housing, and environmental planning, reducing the potential for adverse land use conflicts over the planning horizon.

Environmental Element	No Action Alternative	Action Alternative	Mitigation Measures	Significant Unavoidable Impact
Consistency with Plans	The No Action Alternative would retain the City's 2015 Comprehensive Plan and implementing development regulations. While the existing plan continues to provide a policy framework for land use and development, it predates numerous amendments to the Growth Management Act adopted since 2015, including new requirements addressing housing affordability, climate change and resiliency, multimodal transportation, environmental justice, and housing capacity by income level. As a result, the No Action Alternative would not fully implement current state planning requirements or reflect updated functional plans, population forecasts, and capital facility planning. Although future development would continue to be reviewed under existing regulations, the City's planning framework would become increasingly inconsistent with current statutory requirements and adopted planning objectives.	The Action Alternative comprehensively updates the City's planning framework to ensure consistency with current Growth Management Act requirements, Clallam County Countywide Planning Policies, and recently adopted state legislation. The updated Comprehensive Plan is coordinated with the Capital Facilities Plan, creating an integrated planning framework that aligns land use, infrastructure, housing, transportation, utilities, environmental protection, and public services. The proposal also incorporates recent legislative requirements addressing affordable housing, climate resilience, multi-modal transportation, and housing diversity, providing a comprehensive and coordinated policy framework to guide future growth through 2045.	• Updated 2025 Comprehensive Plan • Clallam County Countywide Planning Policies • Capital Facilities Plan • 2023 Water System Plan • Updated Transportation Master Plan • General Sewer Plan • Parks and Open Space Master Plan • Multi-Jurisdictional Hazard Mitigation Plan • Updated Title 18 Development Regulations • Continued periodic review required by the Growth Management Act	The Action Alternative improves consistency among local, regional, and state planning documents and implements current statutory requirements, resulting in a more coordinated and effective planning framework for future growth. The No Action Alternative would result in a significant impact due to its inconsistency with the GMA.
Housing	The No Action Alternative would retain the existing Housing Element and development regulations adopted as part of the 2015 Comprehensive Plan. Although the existing plan provides sufficient overall land capacity to accommodate projected residential growth, it does not fully address the substantial housing planning	The Action Alternative substantially strengthens the City's Housing Element by implementing recent Growth Management Act amendments and adopting policies that support housing choice, affordability, and equitable access to housing opportunities. The updated Comprehensive Plan incorporates the Housing Needs Assessment,	• Housing Element policies • Housing Needs Assessment • Adequate Provisions Analysis • Racially Disparate Impacts Analysis • Land Capacity Analysis	The Action Alternative demonstrates sufficient residential land capacity to accommodate the City's 2045 housing allocation while substantially improving compliance with current Growth Management Act requirements.

Environmental Element	No Action Alternative	Action Alternative	Mitigation Measures	Significant Unavoidable Impact
	requirements adopted by the Washington State Legislature since 2015. The No Action Alternative would not incorporate a Housing Needs Assessment, Adequate Provisions Analysis, Racially Disparate Impacts Analysis, or sufficient planning for housing across all income levels as now required by the Growth Management Act. Existing housing regulations would continue to support residential development; however, opportunities for affordable housing, middle housing, accessory dwelling units, supportive housing, co-living, and other housing types would remain more limited than under current state law.	Adequate Provisions Analysis, Racially Disparate Impacts Analysis, and Land Capacity Analysis, demonstrating sufficient capacity to accommodate projected housing growth through 2045 while addressing housing needs across all income levels. Amendments to Title 18 expand opportunities for accessory dwelling units, middle housing, affordable housing, permanent supportive housing, emergency housing, co-living, and mixed-use residential development consistent with state law. Together, these updates provide a comprehensive strategy for increasing housing availability, improving housing diversity, and reducing regulatory barriers while maintaining compatibility with existing neighborhoods.	• Updated Title 18 Development Regulations • Affordable Housing Exceptions • Accessory Dwelling Unit regulations • Middle housing, supportive housing, and co-living standards • Ongoing implementation through development review and annual Comprehensive Plan amendments	Although continued population growth will increase demand for housing, the updated Comprehensive Plan and development regulations establish a comprehensive framework to support housing production, affordability, and housing diversity over the planning horizon. The No Action Alternative would result in a significant impact due to its inconsistency with the GMA.
Transportation	Under the No Action Alternative, population and employment growth would continue to increase travel demand throughout the City's transportation system. The existing 2015 Comprehensive Plan would continue to rely on an outdated transportation planning framework that does not fully reflect current travel forecasts, multi-modal transportation priorities, or revised capital improvement planning. Although future transportation improvements would continue to occur through the City's Transportation Improvement	The Action Alternative incorporates the updated Transportation Master Plan and coordinates future land use with planned transportation improvements necessary to accommodate forecast population and employment growth through 2045. The updated Comprehensive Plan emphasizes a balanced, multi-modal transportation system by supporting roadway improvements, pedestrian and bicycle connectivity, transit opportunities, and transportation demand management strategies that improve mobility for all users. The Transportation Master	• Updated Transportation Master Plan • Transportation concurrency requirements • Six-Year Transportation Improvement Program • Transportation impact fees • Capital Facilities Plan • Complete Streets and multimodal transportation policies • Pedestrian, bicycle, and transit improvements	Although roadway congestion and traffic volumes are expected to increase over time, the Action Alternative substantially improves the City's ability to accommodate growth through coordinated transportation planning, multi-modal investments, concurrency management, and implementation of the Transportation Master

Environmental Element	No Action Alternative	Action Alternative	Mitigation Measures	Significant Unavoidable Impact
	Program and ongoing maintenance activities, the No Action Alternative would not incorporate the updated Transportation Master Plan, revised level of service analyses, or transportation policies developed to address projected growth through 2045.	Plan demonstrates that the City's transportation system can accommodate projected growth through planned capital improvements, operational enhancements, and implementation of concurrency requirements. While traffic volumes and travel demand are expected to increase as a result of growth, the Action Alternative provides a coordinated framework for prioritizing transportation investments that improve safety, connectivity, and system performance.	• Traffic impact analyses for future development • Project-level SEPA review for transportation projects • Ongoing roadway maintenance and operational improvements	Plan. No significant unavoidable adverse transportation impacts beyond those associated with planned urban growth are anticipated. The No Action Alternative would result in a significant impact due to its inconsistency with the multi-modal requirements of GMA and lack of updated transportation analyses.
Public Services and Utilities	The No Action Alternative would continue to accommodate future growth using the City's existing 2015 Comprehensive Plan and capital facility planning framework. Population growth would increase demand for potable water, sanitary sewer, stormwater facilities, parks, schools, police, fire protection, and other public services. The No Action Alternative would not integrate updated utility plans with the City's Comprehensive Plan or respond to updated growth allocations.	The Action Alternative updates the Comprehensive Plan to fully coordinate future growth with the City's Capital Facilities Plan and adopted utility master plans, including the 2023 Water System Plan, General Sewer Plan, Transportation Master Plan, Parks and Open Space Plan, and other public facility planning documents. These updated plans demonstrate that public facilities and utilities can be expanded to accommodate the adopted 2045 population and employment forecasts while maintaining adopted levels of service through planned capital improvements, system upgrades, and ongoing maintenance. Future development will continue to be served through extension of public infrastructure, developer improvements, utility connection	• Capital Facilities Plan • 2023 Water System Plan • General Sewer Plan • Stormwater Management Program • Parks, Recreation and Open Space Plan • Transportation Master Plan • Utility connection requirements • Development impact fees • Concurrency requirements • Capital Improvement Program • Ongoing coordination with utility providers and public service agencies • Project-level engineering review and permitting	Planned capital improvements, updated utility master plans, and continued investment in public infrastructure demonstrate that adequate public facilities and services can be provided concurrent with development. While demand for public services and utilities will increase as a result of projected population growth, the Action Alternative coordinates land use and infrastructure planning to ensure facilities can be expanded in a timely and efficient manner consistent with the

Environmental Element	No Action Alternative	Action Alternative	Mitigation Measures	Significant Unavoidable Impact
		requirements, and capital investment programming.		Growth Management Act. The No Action Alternative would have a significant impact due to lack of updated utilities planning and improvement lists.
Historic and Cultural Resources	Under the No Action Alternative, future population and employment growth would continue to result in redevelopment and new construction throughout the City. Although adoption of the existing 2015 Comprehensive Plan would not directly affect historic or cultural resources, future development activities could result in the disturbance of previously unidentified archaeological resources, historic properties, or areas of cultural significance. Existing federal, state, and local regulations would continue to require review of applicable projects, including consultation with the Washington State Department of Archaeology and Historic Preservation (DAHP) and affected Tribes when appropriate. Future development would also remain subject to project-level SEPA review and inadvertent discovery procedures where archaeological or cultural resources are encountered.	The Action Alternative updates the Comprehensive Plan while continuing to recognize the importance of preserving Sequim's historic, archaeological, and cultural resources as the community grows. The updated policies encourage consideration of historic preservation, cultural resource protection, and coordination with Tribes, DAHP, and other agencies during future planning and development activities. Future development proposals resulting from the updated land use framework will continue to undergo project-level environmental review, permitting, and consultation, allowing potential impacts to be identified, avoided, minimized, or mitigated before construction occurs.	• Consultation with the Washington Department of Archaeology and Historic Preservation (DAHP), as applicable • Government-to-government consultation with affected Tribes, including the Jamestown S'Klallam Tribe, when appropriate • Compliance with applicable state and federal cultural resource laws • Archaeological surveys and cultural resource assessments, when required • Inadvertent Discovery Procedures for archaeological resources and human remains • Historic preservation policies contained within the Comprehensive Plan • Site-specific permit review and conditions of approval	Adoption of the Comprehensive Plan does not directly affect historic or archaeological resources, and future development will remain subject to applicable federal, state, and local regulations, consultation requirements, and project-level environmental review. No significant unavoidable adverse impacts to historic or cultural resources are anticipated under either alternative.

2 Proposal and Alternatives

2.1 2.1 Overview of Proposal

The City of Sequim is updating its citywide comprehensive plan ("the comprehensive plan") consistent with the Growth Management Act (GMA; RCW 36.70A). The comprehensive plan is designed to implement the City's long-term vision, values, and priorities for land use, growth management, and provision of public services and infrastructure. The comprehensive plan:

- Acknowledges the population, housing, and employment growth allocations to the City of Sequim to prevent sprawl in rural areas and deliver public services and infrastructure efficiently.
- Addresses housing needs for all economic segments of the population, supporting a variety of housing options and lifestyles to accommodate all ages, incomes, and household types.
- Supports economic development to foster a thriving business environment that retains small businesses, attracts larger employers, and encourages innovation.
- Conserves open space and resource lands and protects the natural environment and cultural and historic resources.
- Expands transportation choice and connectivity with safe, efficient multimodal options.
- Incorporates climate change planning and enhances community resilience to more effectively respond to natural hazards that are increasing in frequency and intensity.

Consistent with current GMA standards, the 2025 Comprehensive Plan update extends the planning horizon year to 2045; accommodates new population, housing, and jobs allocations; assures adequate capacity for housing at all income levels; updates policies to address racially disparate impacts; and supports investments in multimodal transportation, utilities, public services and facilities, and parks. Pursuant to the GMA, the plan is also consistent with Clallam County's Countywide Planning Policies (CPPs).

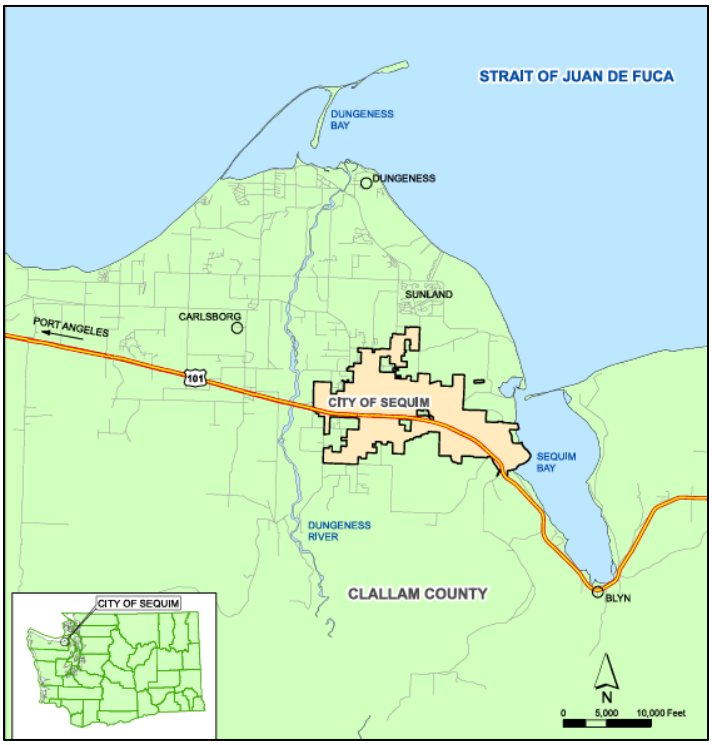
This DSEIS is intended to satisfy requirements of the State Environmental Policy Act (SEPA) to analyze proposals and identify potential environmental impacts resulting from decisions made by an agency. Two alternatives are examined in this DSEIS:

- **No Action Alternative**. The No Action Alternative is required under SEPA. This alternative retains the current 2015 Sequim Comprehensive Plan and assumes no changes to the plan structure, the future land use plan, adopted policies, or zoning regulations. The No Action Alternative has adequate land capacity to meet total housing and job allocations but does not sufficiently address housing capacity by income bands and does not fully meet new GMA requirements for a periodic update.

- **Proposed Action Alternative.** The Proposed Action consists of the City of Sequim 2025 Draft Comprehensive Plan and associated amendments to Title 18 of the Sequim Municipal Code (SMC). The Proposed Action represents the City's periodic update under the Washington Growth Management Act (GMA) and updates Comprehensive Plan goals, policies, future land use designations, and development regulations to accommodate projected growth through the 2045 planning horizon. The Proposed Action provides sufficient land capacity to accommodate adopted population, housing, and employment growth allocations, including housing needs across all income levels, while incorporating recent state legislative requirements related to housing, multimodal transportation, climate planning and resilience, and other planning policy updates. The accompanying amendments to Title 18 SMC implement the updated Comprehensive Plan and ensure consistency with current state law, as well as targeted procedural, substantive, and formatting revisions that clarify the City's development regulations.

2.1.1 Study Area

The study area includes all land within the City of Sequim corporate city limits, approximately 3,500 acres and 6.37 square miles.



2.1.2 Objectives of Proposal

SEPA requires a statement of proposal objectives and the purpose and need to which the proposal is responding. The primary objective and need for this proposal is to complete the 2025 periodic update of the Sequim Comprehensive Plan to meet Growth Management Act requirements, and

- Demonstrate capacity to accommodate housing and jobs growth allocations through 2045.
- Meet legislative requirements and countywide planning policies for affordable housing and housing types.
- Support economic development and business for prosperous community and economic vitality.
- Support transit, non-motorized and other alternative transportation modes through appropriate housing choices, employment opportunities, and multimodal transportation infrastructure.

- Ensure that public services, multimodal transportation infrastructure and capital facilities can be efficiently and effectively provided to support forecast development at appropriate levels of service.
- Enhance access to parks, recreation, and cultural amenities.

2.2 Planning Context

2.2.1 Growth Management Act

The Growth Management Act (GMA) was enacted in 1990 and amended substantially in 1991 and most years thereafter. The act is meant to guide faster growth counties and their cities to prepare comprehensive plans centered around a land use plan designed to meet growth targets for a 20-year period. The 20-year plan also addresses goals and policies regarding land use, housing, economic development, capital facilities, parks and recreation and transportation. A new required element addresses climate change and resiliency.

The GMA goals include the following 15 goals which guide the preparation of the comprehensive plan and development regulations such as zoning and critical areas protection:

GMA Goal		
1	Urban Growth	Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
2	Reduce Sprawl	Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.
3	Transportation	Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled, and are based on regional priorities and coordinated with county and city comprehensive plans.
4	Housing	Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.
5	Economic Development	Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.

6	Property Rights	Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.
7	Permits	Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.
8	Natural Resource Industries	Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands, and discourage incompatible uses.
9	Open Space and Recreation	Retain open space and green space, enhance recreational opportunities, enhance fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.
10	Environment	Protect and enhance the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.
11	Citizen Participation and Coordination	Encourage the involvement of citizens in the planning process, including the participation of vulnerable populations and overburdened communities, and ensure coordination between communities and jurisdictions to reconcile conflicts.
12	Public Facilities and Services	Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.
13	Historic Preservation	Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance.
14	Climate Change and Resiliency	Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice.
15	Shorelines	Pursuant to RCW 90.58.020, provide for the management of the shorelines of the state by planning for and fostering all reasonable and appropriate uses, insure the development of these shorelines in a manner which, while allowing for limited reduction of rights of the public in the navigable waters, will promote and enhance the public interest. This policy contemplates protecting against adverse effects to the public health, the land and its vegetation and wildlife, and the waters of the state and their aquatic life, while protecting generally public rights of navigation and corollary rights incidental thereto.

In recent years, there have been significant amendments to the GMA; the most substantive and relevant amendments are summarized below.

Table 2.2.1-1 Growth Management Act Amendments Applicable to Sequim's Periodic Update

Topic	Year Passed	Bill Number	Summary	Sequim Implementation
Housing	2019	HB 1377	Requires allowing a density bonus for affordable housing developments on property owned by religious organizations.	Title 18 Zoning Update
Housing	2019	HB 1923	Encourages jurisdictions to take actions to increase residential building capacity, requires that permanent supportive housing be allowed in areas permitting multi-unit residential buildings, and limits minimum parking standards.	Title 18 Zoning Update
Housing	2020	HB 2343	Expands the list of actions jurisdictions are encouraged to take to increase residential building capacity, limits minimum parking standards for housing, and amends the definition of "permanent supportive housing."	Title 18 Zoning Update
Occupants per dwelling unit	2021	ESSB 5235	Except for group living and other specific exceptions, cannot regulate or limit the number of unrelated persons that may occupy a household or dwelling unit.	Title 18 Zoning Update
Housing Element	2021	HB 1220	Establishes significant updates to requirements for comprehensive plan housing elements and related development regulations. Includes requirements for STEP housing, housing by income band, Housing Needs Assessment, Adequate Provisions and Racially Disparate Impacts Analysis.	Comprehensive Plan, Appendix A, Title 18 Zoning Update
Impact Fees	2023	HB 5258	Requires impact fees to reflect a proportionate impact based on square footage, number of bedrooms, or trips.	After Comprehensive Plan Adoption
Climate and Resiliency	2023	HB 1181	Adds a climate change and resiliency goal to the GMA. Requires a new climate change and resiliency element in GMA comprehensive plans. Requires active transportation (pedestrian, bicycle) level of service standards be included in Transportation Element.	Comprehensive Plan

Topic	Year Passed	Bill Number	Summary	Sequim Implementation
Building Conversions	2023	HB 1042	Intended to promote the conversion of existing commercial and mixed-use buildings to multi-family. Exempts the added units from parking mandates, density limits and other regulatory barriers	Title 18 Zoning Update
Building Design	2023	HB 1293	Revise development regulations related to exterior building design standards to ensure they are clear and objective.	Title 18 Zoning Update
Housing	2023	HB 1337	Requires allowing at least two accessory dwelling units per lot and limits regulation of certain standards related to ADUs.	Title 18 Zoning Update
Housing	2024	HB 1998	Requires allowing co-living on any lot that allows at least six units, including mixed use zoning.	Title 18 Update
Parking	2024	SB 6015	Limits authority to regulate certain parking standards and provides standards that jurisdiction shall use.	Title 18 Zoning Update
Housing	2024	ESHB 1998	Requires allowing co-living housing as a permitted use on any lot that allows at least six multifamily residential units, including lots zoned for mixed-use development.	Title 18 Zoning Update
Housing	2025	ESSHB 1096	Division of land through lot splitting.	Title 17 Land Division (completed 3/2026)
Housing	2025	SB 5611	Allows binding site plans for multifamily development.	Title 17 Land Division (completed 3/2026)
Housing	2025	ESSHB 1096	Increases housing options through a one-time administrative lot split which may be processed concurrently with the review of a residential building permit.	Title 17 Land Division (completed 3/2026)
Housing	2025	SB 1183	Prohibits certain building design features on multifamily housing.	Title 18 Zoning Update

Topic	Year Passed	Bill Number	Summary	Sequim Implementation
Housing	2026	HB 2266	Requires cities and counties to allow transitional housing, permanent supportive housing, indoor emergency shelters, and indoor emergency housing (STEP housing) in any zones that are not zoned for industrial use.	Title 18 Zoning Update
Housing	2026	HB 2266	Requires allowing transitional housing, permanent supportive housing, indoor emergency shelters and indoor emergency housing (STEP) housing in all zones except those zoned industrial.	Title 18 Zoning Update
Housing	2026	HB 1859	Allows mixed-income developments on property owned by a religious organization to qualify for a density bonus.	Title 18 Zoning Update

2.2.2 Clallam Countywide Planning Policies

The GMA requires counties and cities to collaboratively develop CPPs to set the general framework for coordinated land use and population planning between a county and its cities to ensure comprehensive plans are consistent with each other (RCW 36.70A.210). All comprehensive plans prepared by Clallam County and its cities and towns are to be consistent with CPPs per GMA. The Clallam County CPPs were last updated in 2018 and cover the following topics:

- Urban Growth Areas
- Joint Planning and Contiguous and Orderly Development
- Siting of Public Capital Facilities
- Transportation Facilities and Strategies
- Affordable Housing
- Economic Development and Employment
- Fiscal Impact Analysis of Urban Growth Areas
- Open Space Corridors Within and Between Urban Growth Areas
- Environment
- Rural Land Uses and Development Patterns

Clallam County reviewed its CPPs during its 2025 Comprehensive Plan Update process and determined no changes were necessary.

2.2.3 Comprehensive Plan and Related Plans

2.2.3.1 2025 Comprehensive Plan Update

The 2025 Sequim Comprehensive Plan addresses a wide variety of elements land use, community character, housing, economic development, natural environment, transportation, capital facilities and utilities, parks and recreation, and climate and resiliency. The Comprehensive Plan was originally adopted in 1995, with major updates in 2005-06 and 2015. Less extensive revisions are allowed every year through the annual docketing process.

The 2025 Comprehensive Plan Update will address a 20-year planning horizon to the year 2045 and considers new population, housing, and job targets, updates to the future land use map, a fair share of affordable housing, racially disparate impacts of housing policies, and supporting investments in parks, multimodal transportation, public facilities, utilities, and services. All Comprehensive Plan components are under review in the 2025 Update.

The comprehensive planning process includes the following components

- 2045 Growth Targets. Population, Employment, and Housing targets for the period from 2020 to 2045 set forth by Clallam County in coordination with its cities. Growth projections assigned to Sequim are: 2,959 new residents in city limits and 477 new

residents in UGA areas; 1,850 new housing units in city limits and 298 new housing units in UGA areas; and 909 new jobs in city limits and 147 new jobs in UGA areas.

- Comprehensive Plan Policy Review. Review comprehensive policies that provide the direction of ongoing and future planning efforts, development regulations, and the vision of Sequim.
- Compliance Review. Ensures the comprehensive plan and development regulations are consistent with changes made to GMA since 2015.
- Capital Facilities Plan Update. Updating the inventory of existing capital facility and utility infrastructure, transportation and parks forecast of future needs, LOS standards, cost of future facilities, and funding mechanisms to finance projects over the 20-year horizon.

2.2.3.2 Related City Plans

The City of Sequim currently has six adopted functional plans and the contents and uses of plans and regulations are summarized below.

Capital Improvement Plan

The 2025-2030 Capital Improvement Plan (CIP) outlines funds in yearly breakdowns that will be allocated towards specific projects. Projects are separated into different categories such as Capital Facilities, Parks, Sewer, Streets, and others. Projects that fall under multiple categories are contained under a Multiple Divisions header. The CIP is required to be updated every five years with the current version being the most up to date at this time.

Parks, Recreation, and Open Space Plan

Updated in 2022, the City of Sequim's Parks, Recreation, and Open Space Plan provides a long-term framework for maintaining, improving, and expanding the city's parks and recreation systems. Existing parklands, and amenities were inventoried with gaps assessed in recreational opportunities. A prioritized list of improvements and expansion projects was included as well as funding approaches and implementation strategies.

Water System Plan

The 2023 Water System Plan is a 10- and 20-year planning document which evaluates the City's water supply sources, system infrastructure, population growth projections, and future demand. It documents existing infrastructure including wells, reservoirs, pump stations, and distribution pipelines. The plan also identifies improvements needed to address issues and system expansion to serve anticipated growth within the city limits and urban growth area.

Transportation Master Plan

The 2013 Transportation Master Plan (TMP) was updated in 2026 and is included as an appendix to the 2025 Comprehensive Plan. The TMP provides a long-term strategy for managing and improving the City's transportation system to support future growth, safety,

and mobility. Existing conditions and travel trends are incorporated into the Plan to create policies and goals to guide transportation investments. Short- and long-term capital improvement projects and funding priorities are identified.

General Sewer Plan

The 2013 General Sewer Plan is currently being updated and pertinent components will be included as an appendix to the 2025 Comprehensive Plan. The General Sewer Plan a long-term planning document with a 20-year planning period. The document details the specifics of the City of Sequim's collection system, water reclamation facilities, and associated waste management systems. Improvements to collection and treatment capacity have been included to serve the City's projected growth.

Multi-Jurisdictional Hazard Mitigation Plan

This document is a countywide planning effort designed to reduce the impacts of natural and human-caused hazards on communities within Clallam County and was adopted by the County and the City of Sequim in 2025. The plan identifies major risks such as earthquakes, tsunamis, flooding, wildfires, and drought and contains strategies and mitigation efforts for combating the effects of these hazards. This document is required to be updated every five years with the current version being the most up to date at this time.

2.3 Proposed Action and Alternatives

The City of Sequim is updating its citywide comprehensive plan consistent with the Growth Management Act (GMA; RCW 36.70A). The comprehensive plan is designed to implement the City's long-term vision, values, and priorities for land use, growth management, and provision of public services and infrastructure. The comprehensive plan:

- Acknowledges the population, housing, and employment growth allocations to the City of Sequim to prevent sprawl in rural areas and deliver public services and infrastructure efficiently.
- Addresses housing needs for all economic segments of the population, supporting a variety of housing options and lifestyles to accommodate all ages, incomes, and household types.
- Supports economic development to foster a thriving business environment that retains small businesses, attracts larger employers, and encourages innovation.
- Conserves open space and resource lands and protects the natural environment and cultural and historic resources.
- Expands transportation choice and connectivity with safe, efficient multimodal options.
- Incorporates climate change planning and enhances community resilience to more effectively respond to natural hazards that are increasing in frequency and intensity.

Consistent with current GMA standards, the 2025 Comprehensive Plan update extends the planning horizon year to 2045; accommodates new population, housing, and jobs allocations; assures adequate capacity for housing at all income levels; updates policies to address racially disparate impacts; and supports investments in multimodal transportation, utilities, public services and facilities, and parks. Pursuant to the GMA, the plan is also consistent with Clallam County's Countywide Planning Policies (CPPs).

The GMA calls for community to review and, if necessary, revise their comprehensive plans and regulations every ten years to ensure they remain up to date. Consistent with this update requirement and current GMA standards, the 2025 Comprehensive Plan update extends the planning horizon year to 2045; accommodates new population, housing, and jobs allocations; assures adequate capacity for housing at all income levels; updates policies to address racially disparate impacts; and supports investments in multimodal transportation, utilities, public services and facilities, and parks. Pursuant to the GMA, the plan is also required to be consistent with Clallam County's Countywide Planning Policies (CPPs).

SEPA is intended to ensure that environmental values are considered during decision-making by state and local agencies. The environmental review process in SEPA is designed to work with other regulations to provide a comprehensive review of a proposal. This DSEIS is intended to satisfy requirements of the State Environmental Policy Act (SEPA) to analyze proposals and identify potential environmental impacts resulting from decisions made by an agency. Two alternatives are examined in this DSEIS:

No Action Alternative. The No Action Alternative is required under SEPA. This alternative retains the current 2015 Sequim Comprehensive Plan and assumes no changes to the plan structure, the future land use plan, adopted policies, or zoning regulations (SMC Title 18). The No Action Alternative in Policy UG 2.4.1 identifies a population growth of 3400 new residents, and based on median household size (1.93), that represents 1761 new housing units. There is adequate land capacity to meet housing growth but does not sufficiently address housing capacity by income bands and does not fully meet new GMA requirements for a periodic update.

Proposed Action Alternative. The Proposed Action Alternative consists of adoption of the City of Sequim 2025 Draft Comprehensive Plan and associated amendments to Title 18 of the Sequim Municipal Code. The proposal represents the City's periodic update under the Washington Growth Management Act and updates the Comprehensive Plan and development regulations to reflect current statutory requirements, adopted policies, and the City's projected growth through 2045.

The Proposed Action would:

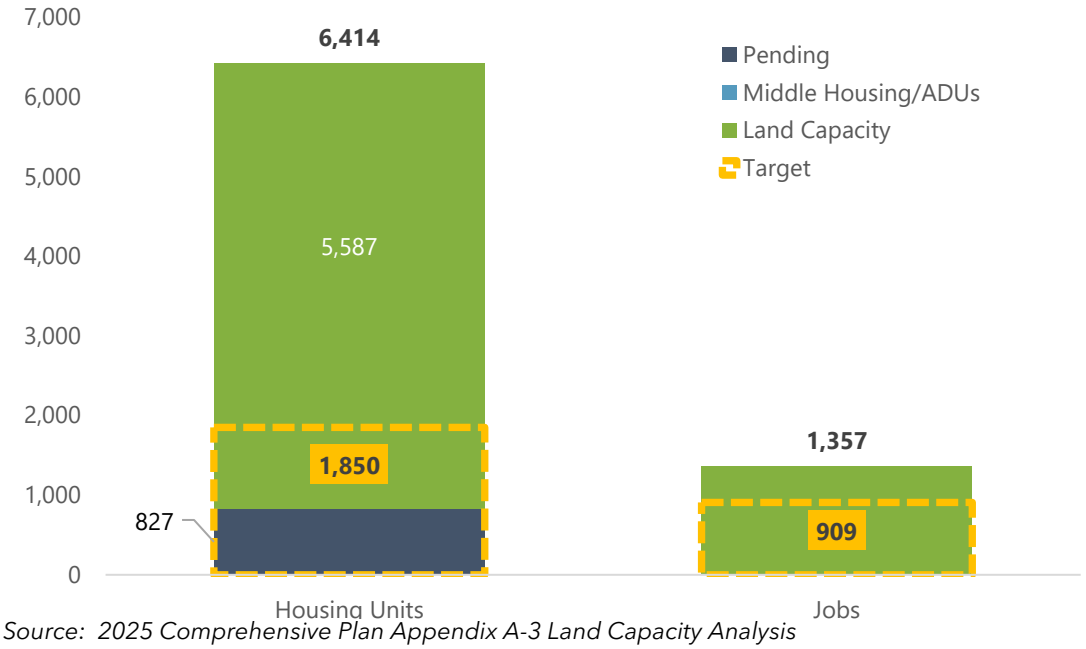
- Update all Comprehensive Plan elements to reflect current planning conditions, state law, and community priorities.

- Plan for growth consistent with Clallam County's adopted 2045 growth allocations, including:
    - 2,959 additional residents;
    - 1,850 additional housing units; and
    - 909 additional jobs.

- Ensure sufficient land capacity to accommodate projected residential, commercial, industrial, and public uses through 2045.
- Update the Housing Element to comply with current GMA requirements by planning for housing needs across all income levels, including emergency housing, permanent supportive housing, and a variety of housing types.
- Modify the Future Land Use Map and Title 18 development regulations to provide adequate development capacity, implement updated housing policies, and allow modest increases in residential density in selected areas of the city.
- Incorporate new state requirements related to housing, climate change and resiliency, multimodal transportation, environmental justice, and equity planning.
- Evaluate racially disparate impacts, displacement risk, and exclusion in housing policies and incorporate strategies intended to reduce barriers to housing opportunities.
- Update Title 18 of the Sequim Municipal Code to implement the Comprehensive Plan, address changes in state law, improve consistency with GMA requirements, and clarify, modernize, and streamline development regulations and procedures.

The land capacity available for housing and jobs in Sequim is displayed below in Table 2.3-1 below in green: Sequim's total housing capacity is 5,587 units and the employment capacity is 1,357 jobs. The housing and job allocation by Department of Commerce and Clallam County are highlighted in dashed yellow boxes. Overall, Sequim has sufficient capacity to accommodate its 2045 housing and job targets.

Table 2.3-1 Sequim Land Capacity Analysis Results for Total Housing and Jobs 2020-2045



Source: 2025 Comprehensive Plan Appendix A-3 Land Capacity Analysis

2.3.1 Future Land Use and Zoning Maps

Proposed Future Land Use and Zoning Maps

The proposed Future Land Use and Zoning Maps includes several updates from the 2015 Future Land Use Map. The proposed changes were informed by early public engagement process, input from Planning Commission and City Council, and technical analysis and recommendations for the 2025 Comprehensive Plan, such as the 2025 Housing and Economic Market Analysis, Adequate Provisions Analysis, and Racially Disparate Impacts Analysis, all prepared by Leland Consulting Group.

The following summarizes the primary changes to the Future Land Use and Zoning maps:

- Low Density Residential/R4-9 - increase in one unit per acre to align with minor subdivision standards.
- Lifestyle District – no changes proposed.
- Neighborhood Business – additional travel service uses.
- Community Mixed Use – no changes proposed.
- Regional Commercial – no changes proposed.
- Highway Commercial – additional uses consistent with other commercial districts.
- Heavy Commercial/Warehouse – no changes proposed.

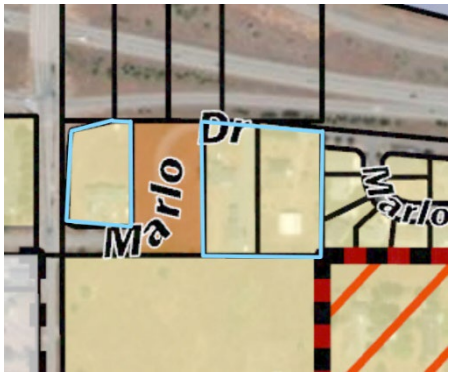
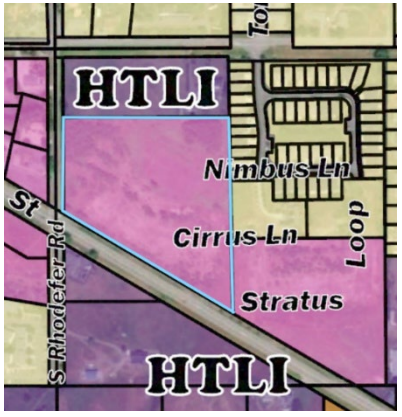
- High Tech Light Industrial – additional uses for food and beverage production, tasting rooms, and similar uses.
- Opportunity Areas – eliminate 'economic' from designation name, include locational name (i.e. Bell Creek or River Road), and allow for increased range of uses, including mixed use and residential.
- Downtown Districts – consolidation to two districts (from three) Downtown Core and Downtown Mixed Use (DMU).
- Planned Resort Community – adds district specific standards.
- Agricultural Conservancy – no changes proposed.
- Public - Consolidation of Park, Neighborhood Park and Schools designations with other public uses, into a Public land use and zoning district.
- Open Space – separate from parks, acknowledges state-owned land.

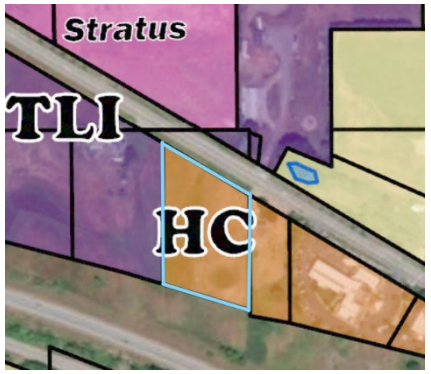
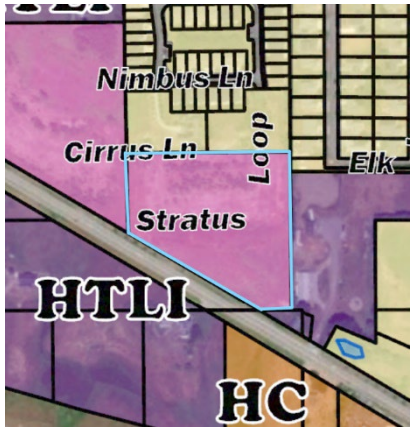
Proposed Land Use and Zoning Redesignations

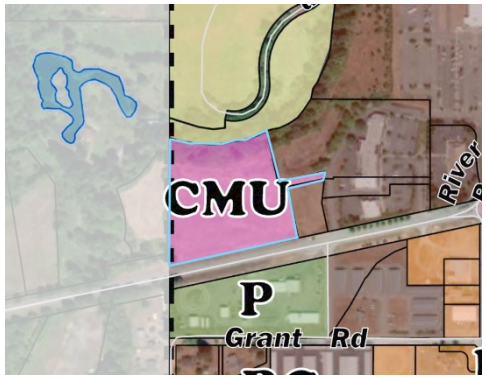
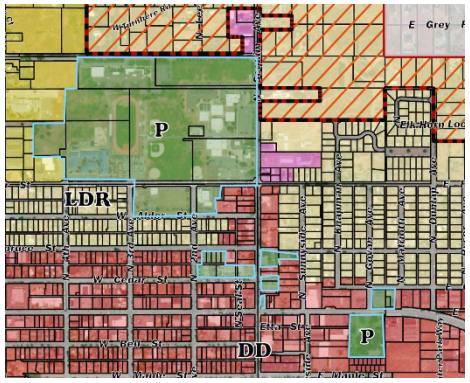
As part of the periodic update process, Sequim DCED solicited redesignations requests for property land use designation and zoning map changes. Table 2.3-2 below lists the reclassification requests from property owners, as well as several recommended by City staff. The recommended changes are reflected in the Action Alternative's 2025 Comprehensive Plan's Future Land Use Map and Zoning Map.

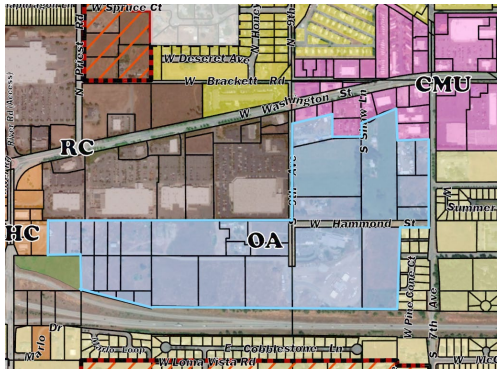
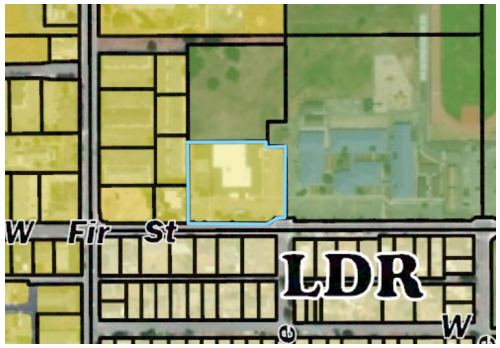
The site-specific reclassifications requests do not authorize or constitute a specific development proposal or physical alteration of the environment, are subject to SEPA phased review, pursuant to WAC 197-11-060(5), and evaluated in this DSEIS as described in Section 1.4.2 Level of Analysis. In phased review, future environmental documents may be followed by narrower documents, such as a SEPA environmental checklist, that concentrates solely on the issues specific to a site-specific development proposal.

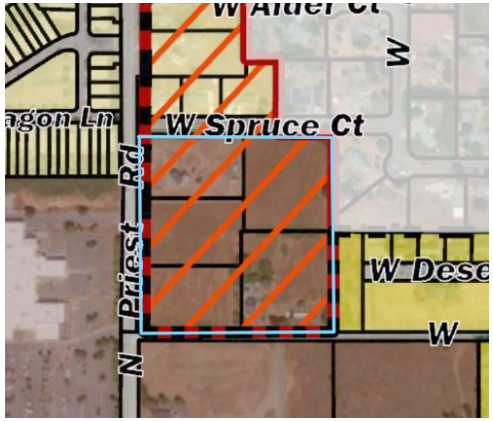
Table 2.3.1-1: Site-Specific Redesignation/Rezones included in Action Alternative

Application Number	Property Owner Name	Parcel ID	Land Use Designation	Requested Designation	Highlight of Site-Specific Parcel	Staff Recommendation
CPA-26-001	Alward	043024430125	HC	LDR		*Recommend* approval of this request and recommend including the two of the three HC properties to the east as well.
CPA-26-002	Frykholm I (E. Washington)	033021330018	HTLI	CMU		*Recommend* approval of this rezone. CMU gives flexibility for more commercial uses and medium to high density multifamily options to meet income band housing allocation by Washington State Department of Commerce

Application Number	Property Owner Name	Parcel ID	Land Use Designation	Requested Designation	Highlight of Site-Specific Parcel	Staff Recommendation
CPA-26-003	Frykholm II (E. Washington)	033028220040	HTLI	HC		*Recommend* approval of this rezone. Expanding HC from existing adjacent HC makes sense.
CPA-26-004	Reidt	033021330025	HTLI	CMU		*Recommend* approval of this rezone. CMU gives flexibility for more commercial uses and medium to high density multifamily options to meet income band housing allocation by Washington State Department of Commerce.

Application Number	Property Owner Name	Parcel ID	Land Use Designation	Requested Designation	Highlight of Site-Specific Parcel	Staff Recommendation
CPA-26-005	Schaafsma	043024317030	RC	CMU		*Recommend approval* of this rezone. CMU gives the flexibility for commercial uses or medium to high density multifamily options to meet income band housing allocation by Washington State Department of Commerce.
CPA-26-006(A)	Multiple	Multiple	Multiple	P	 *Not all Public Properties are displayed in this snapshot	*Recommend approval of this Re-designation. Public allows for flexibility that does not currently exist for these properties.*

Application Number	Property Owner Name	Parcel ID	Land Use Designation	Requested Designation	Highlight of Site-Specific Parcel	Staff Recommendation
CPA-26-006(B)	Multiple	Multiple	EOAs	OAs	 *This is only the River Rd OA, the Bell Creek OA has also been updated.	*Recommend approval of this re-designation. This is just a name change that will better reflect the purpose of these properties.*
CPA-26-006(C)	Sequim School District	033019129050	LDR	LD		*Recommend approval of this Re-designation. Lifestyle District would make the existing use conforming.*

Application Number	Property Owner Name	Parcel ID	Land Use Designation	Requested Designation	Highlight of Site-Specific Parcel	Staff Recommendation
CPA-26-006(D)	Multiple	Multiple	LDR	RC		*Recommend approval of this pre-designation. Change retains acreage available for RC uses for possible future demand. The pre-designation addresses loss of current RC zoned land being converted to CMU through CPA-26-005. This is not a zoning change and will only be applicable upon annexation.*

2.3.2 Development Regulations Update – Title 18

Update to the Sequim Municipal Code Title 18 Zoning is included in the Proposal and a component of Action Alternative. In addition to updates to the Future Land Use and Zoning Map (described above), the following table summarizes the proposed changes to SMC Title 18. A major consideration in the Title 18 update is responding to the state legislature requirements regarding housing. Key changes in Draft Title 18 include:

Proposed Title 18 Regulations

Updates to Title 18 largely focus on improving clarity of required standards, including updating definitions, using consistent terminology, and providing guidance on measurement methodologies. The following is a highlight summary. The Appendix to the SDEIS provides a detailed matrix of Title 18 updates.

- Standardized land use definitions, use classifications, and tables to provide clearer and more predictable development standards.
- Conversion of discretionary or narrative standards into objective, measurable development regulations.
- Revised residential zoning standards, including an increase in the R4-8 district to R4-9, updated density calculations, lot standards, setbacks, and lot coverage requirements.
- Expanded housing opportunities through implementation of state-required housing legislation, including updated standards for accessory dwelling units (ADUs), supportive and transitional housing, affordable housing, co-living, and transitory accommodations.
- New Affordable Housing Exceptions chapter establishing development incentives for qualifying low-income affordable housing projects.
- Creation of a new Site Plan Review chapter to provide a consistent review process for most development projects.
- Updated commercial, mixed-use, downtown, business/employment, and planned resort districts' bulk, dimensional, and height standards.
- Planned Residential Development (PRD) standards to improve predictability and creativity in project design.
- New cluster housing standards to support diverse housing types and more efficient residential development.
- Updated landscaping, buffering, and open space standards emphasizing drought-tolerant and native vegetation while simplifying maintenance requirements.
- Modernized off-street parking standards, including reduced parking requirements for housing where required by state law and consolidation of electric vehicle infrastructure standards.

- Improved procedures for Master Plans, Conditional Use Permits, Temporary Use Permits, Design Review, and Essential Public Facilities to provide greater certainty and clearer decision-making authority.
- Consolidation of related regulations and elimination of redundant provisions to improve usability and reduce administrative complexity.
- Numerous formatting, organizational, and procedural improvements that make the development regulations easier to interpret, administer, and enforce.

The proposed update to Title 18 does not authorize or constitute a specific development proposal or physical alteration of the environment. Rather, it provides the regulatory framework under which future development applications may be submitted and reviewed. Environmental review under SEPA for site-specific impacts generally occurs when an actual development proposal is submitted to the City for permit review. At that time, the City evaluates the proposed project based on its specific location, design, and potential environmental impacts, and conducts any required project-level SEPA review. Therefore, future proposed development projects are subject to SEPA phased review, pursuant to WAC 197-11-060(5). In phased review, broader environmental documents, such as this DSEIS, is likely to be followed by narrower documents, such as a SEPA environmental checklist, that concentrates solely on the issues specific to a site-specific development proposal

2.3.3 Comparison of Alternatives

Table 2.3.3-1 Summary Comparison of Alternatives Studied in Draft SEIS

Component	Impacts Common to Both Alternatives	Impacts of the No Action Alternative	Impacts of the Proposed Action Alternative
Consistency with Plans and Policies			
GMA Compliance		The No Action Alternative is partially consistent with the GMA. The No Action Alternative does not comply with recent changes in planning for housing, multimodal transportation, or climate change.	The Proposed Action Alternative was developed to comply with current GMA standards for comprehensive plans, including amendments related to planning for housing, multimodal transportation, and climate change.
Clallam County CPPs Compliance		The No Action Alternative was developed and adopted prior to the 2018 CPPs. There are no known or apparent conflicts between the 2018 CPPs and the 2015 Comprehensive Plan.	The Proposed Action Alternative referenced the 2018 CPPs and was developed to be consistent with the CPPs.
Plan Format and Structure			
Comprehensive Plan Elements		The No Action Alternative includes 11 Element chapters. The chapters address the minimum GMA requirements for elements of a comprehensive plan, but does not include required Climate and Resiliency or updated Capital Facilities Plan.	The Proposed Action Alternative includes required GMA elements including Climate and Resiliency, and optional Community Character and Natural Environment Chapters. Also includes in Appendix required Housing related components – Housing Needs Assessment, Adequate Provisions, Land Capacity Analysis and Racially Disparate Impacts. Includes an updated Capital Facilities Plan and Transportation Master Plan.
General Vision Concept		The 2015 Comprehensive plan represents a vision for concentrated urban density in Sequim's downtown core, surrounded by regional commercial and employment uses and detached residential development.	The 2025 Comprehensive Plan update builds on 2015 principals and expands sustainable, mixed-use growth, walkability, and a connected transportation network. It also highlights civic engagement, economic vitality, and community resilience as

Component	Impacts Common to Both Alternatives	Impacts of the No Action Alternative	Impacts of the Proposed Action Alternative
			key elements of Sequim's future identity.
Land Use and Zoning			
Future Land Use Map and Zoning	Development will continue, expanding housing supply and employment opportunities as vacant and underutilized parcels are developed or redeveloped.	No significant change.	Development will continue, expanding housing supply and employment opportunities as vacant and underutilized parcels are developed or redeveloped. Includes several redesignation/rezoning of site specific parcels.
Growth Allocations, Land Capacity and Housing Income Needs		Adequate land for housing and jobs growth allocations, but land capacity does not meet current GMA standards for addressing a full range of affordability levels, housing needs assessment, adequate provision, or reduction of racially disparate impacts.	Adequate land for housing and jobs, and provides adequate capacity at the full range of income levels, addresses middle housing, and reduces racially disparate impacts as required.
Natural Environment			
Critical Areas	Development and growth of the City will impact critical areas with both Alternatives; however, critical areas are protected through the City's Critical Area Code.		
Shorelines	Alternative will see changes to the shoreline environment as the City grows, does not propose increased intensity in the shoreline district. Regulation will be through Shoreline Master Program.		
Climate Change Mitigation and Adaptation		The No Action Alternative does not include an assessment of the hazards applicable to the City, nor measures the City's vulnerability consistent with the most recent Clallam County Hazard Mitigation Plan.	The Action Alternative includes Climate and Resiliency Chapter, providing mitigation actions and policies to decrease the City's vulnerability to climate-related hazards.
Water Quality and Surface Runoff	Both alternatives will see an increase in development and impervious surfaces. New developments are regulated		

Component	Impacts Common to Both Alternatives	Impacts of the No Action Alternative	Impacts of the Proposed Action Alternative
	through the City's and DOE's stormwater regulations.		
Best Available Science		The No Action Alternative does not include the current best available science.	Critical Areas Ordinance will be updated to incorporate most recent best available science.
Housing			
Housing Diversity		The No Action Alternative provides for limited housing choices and opportunities.	The Action Alternative provides for wider variety of housing typologies and expanded opportunities for mixed use residential.
Housing Affordability		The No Action Alternative does not address housing affordability required through GMA.	The Action Alternative has evaluated housing income levels as required by GMA in Housing Needs Assessment and Land Capacity Analysis.
Displacement Risk	Both alternatives have minimal risk in potential displacement.		
Transportation			
Vehicles		The No Action Alternative does not identify transportation improvement projects needed to address GMA growth allocation.	Updated LOS analysis and list of transportation improvement projects included in Capital Facilities Plan and updated Transportation Master Plan.
Active Transportation		The No Action Alternative does not identify active transportation improvement projects needed to address GMA growth allocation.	The Action Alternative includes list of projects in the Capital Facilities Plan and updated Transportation Master Plan to address the lack of connections in the active transportation network.
Public Services and Utilities			
Fire and Emergency Services	Current trends are causing the Fire District to make changes and possibly add an additional firehouse. Both Alternatives will increase the need for these changes.		
Police	Both Alternatives will require additional police services to accommodate the anticipated population growth.		
Parks and Recreation	Both Alternatives will require additional park amenities to meet Parks and Open Space Plan's level of service standards.		The Action Alternative includes an updated list of projects in the Capital Facilities Plan to address additional

Component	Impacts Common to Both Alternatives	Impacts of the No Action Alternative	Impacts of the Proposed Action Alternative
			park needs based upon GMA growth forecast.
City-Operated Utilities	Both Alternatives will require significant changes and increased capacity demands to the City's sanitary sewer, water, and stormwater systems.		The Action Alternative includes an updated list of projects in the Capital Facilities Plan to address needed infrastructure to accommodate GMA growth forecast.
Third-Party Utilities	Both Alternatives will increase demand for third-party provided utility services; however, all third-party providers have strategic plans to accommodate increased demand on a larger scale.		
Development Regulations			
Development Regulations	Development will continue as vacant and underutilized parcels are developed or redeveloped. Development is required to follow adopted zoning, engineering, and permitting requirements.	No significant change.	Proposed Draft Title 18 amendments address statutory requirements under GMA and state legislature related to housing; provide for formatting and clarifications.

2.4 SEPA Process

2.4.1 Non Project EIS

The purpose of this DSEIS is to assist the public and decision makers in considering future growth and land use patterns, as well as goals, policies and development regulations as part of the Sequim Comprehensive Plan Periodic Update. These broad decisions will provide direction and support for more specific actions by the City, such as capital improvements.

This DSEIS provides an analysis of environmental impacts as appropriate to the general nature of a comprehensive plan update. The adoption of comprehensive plans or other long-range planning approvals is classified by SEPA as a non-project (i.e. programmatic) action. A non-project action is defined as an action that is broader than a single site-specific project and involves decisions on policies, plans and programs. The DSEIS discusses impacts and alternatives appropriate to the scope of the non-project proposal and to the level of planning for the proposal (WAC 197-11-442). Additional environmental review will occur as other project or non-project actions are proposed in the future. Future review could occur in the form of supplemental EISs, SEPA addenda, or determinations of non-significance.

Table 2.4-1: Comparison of Project and Non-Project Environmental Review

Feature	Project Environmental Review	Non-Project Environmental Review
Location	Site-Specific	Areawide
Analysis Level of Detail	Detailed	Broad/order of magnitude
Alternatives	Specific construction projects	Conceptual based on vision
Mitigation	Specific, alters project or imposes conditions, project proponent responsibility	Broader, changes policies, plans or code. City or future developer responsibility
Future Environmental Review	No additional SEPA review	Subject to additional SEPA review

Source: WAC 197-11-442, -774

2.4.2 Integrated SEPA/GMA Process

Preparation of this DSEIS took place concurrently with development of the 2025 Comprehensive Plan, as consistent with the purpose of SEPA/GMA integration (see WAC 197-11-235). The concurrent development was intended to ensure that environmental analysis under SEPA would be a part of the planning and decision-making process under GMA. As a result, many goals, policies and provisions serve as SEPA mitigations in this SEIS. The DSEIS was released on July 13, 2026 for review and comment by agencies, tribes and member of the public. Comments on the DSEIS will be published along with the response to each in the Final SEIS (FSEIS).

2.4.3 Level of Analysis

The proposal is to perform the periodic update of the City of Sequim Comprehensive Plan as required by the GMA. Under SEPA, this proposal is considered a "non-project" proposal. As defined in WAC 197-11-774, "non-project" means "actions which are different or broader than a single site-specific project, such as plans, policies, and programs." For non-project proposals, SEPA allows for more flexibility in EIS preparation because "there is normally less detailed information available on their environmental impacts and on any subsequent project proposals." Further, for such proposals, impacts and alternatives are to be discussed "in the level of detail appropriate to the scope of the non-project proposal and to the level of planning for the proposal." Site specific analyses are not required (WAC 197-11-442).

2.4.4 Prior SEPA Documents

Since 1996, the City of Sequim has issued the following environmental review documents regarding the City of Sequim Comprehensive Plan:

- Sequim Comprehensive Plan, Final EIS, July 1996
- Sequim Comprehensive Plan Update, Determination of Nonsignificance and associated SEPA Checklist, June 2006

SEPA allows the use of prior environmental documents (WAC 197-11-600) and preparation of supplemental environmental documents (WAC 197-11-620). The City may rely on part of or all prior documents and update past information to consider new alternatives or information.

This Draft SEIS supplements the following previously issued SEPA documents:

- Sequim Comprehensive Plan, Final EIS, July 1996
- Sequim Comprehensive Plan Update, Determination of Nonsignificance and associated SEPA Checklist, June 2006

The Draft SEIS supplements the adopted environmental documents identified above and addresses probable significant adverse environmental impacts, updated conditions, and reasonable alternatives not fully analyzed in the previously prepared environmental documents.

2.4.5 Draft SEIS

This Draft SEIS identifies environmental conditions, potential impacts, and measures to reduce or mitigate any unavoidable adverse impacts that could result from the 2025 Comprehensive Plan Update. This DSEIS evaluates each of the following topics for the three alternatives:

<u>Natural Environment</u>

- Natural and Critical Areas
- Air Quality

- Climate and Hazard Mitigation

Built Environment

- Land Use
- Plans and Policies
- Housing
- Transportation
- Public Services and Utilities
- Historic and Cultural Resources

Public and agency comments are invited on this Draft SEIS. Written are invited during the 30-day public comment period following issuance. Public comments will be considered and addressed in the Final SEIS. Please see the Fact Sheet at the beginning of this Draft SEIS for the dates of the public comment period.

2.4.6 Final SEIS

A Final Supplemental Environmental Impact Statement (Final SEIS or FSEIS) will be prepared for the proposal. The Final SEIS will revise the Draft SEIS as appropriate and respond to comments as required in WAC 197-11-560.

2.4.7 Phased Review

Phased review of the proposal pursuant to WAC 197-11-060(5) is anticipated. Phased review assists agencies and the public to focus on issues that are ready for decision and exclude from consideration issues already decided or not yet ready. In phased review, broader environmental documents, such as this SEIS, may be followed by narrower documents that incorporate prior general discussion by reference and concentrate solely on the issues specific to that phase of the proposal.

2.5 Benefits/Advantages of Delaying Proposed Action

SEPA requires that a Draft SEIS discuss the benefits and disadvantages of reserving for some future time the implementation of the proposal, as compared with possible approval at this time. Particular attention should be given to the possibility of foreclosing future options by implementing the proposal (WAC 197-11-440(5)(vii)).

Investments in multimodal improvements, parks, and other infrastructure would continue to follow existing plans and would not prepare for Sequim's expected share of growth regionally. Retention of the existing Comprehensive Plan and regulations would also not provide a full range of housing meant to address recent GMA laws designed to promote more housing ownership options and to support housing for all income levels.

3 Affected Environment, Impacts and Mitigation Measures

This Chapter is organized to share natural environment conditions followed by built environment conditions, and describes the affected environment, potential impacts, and mitigation measures for the following topics:

Natural Environment

- Section 3.1.1 Natural and Critical Areas
- Section 3.1.2 Air Quality
- Section 3.1.3 Climate and Hazard Mitigation

Built Environment

- Section 3.2.1 Land Use
- Section 3.2.2 Plans and Policies
- Section 3.2.3 Housing
- Section 3.2.4 Transportation
- Section 3.2.5 Public Services and Utilities
- Section 3.2.6 Historic and Cultural Resources

Following a summary description of current conditions (affected environment) for each element of the environment, the analysis compares and contrasts the two alternatives and identifies mitigation measures for identified impacts. It also summarizes whether there are significant unavoidable adverse impacts.

The analysis is broad, areawide, and comparative, considering the non-project proposals (WAC 197-11-442). Where there is a potential for more than a moderate adverse impact on environmental quality (WAC 197-11-794), existing or potential mitigation measures are posed. Consistent with the non-project analysis, mitigation measures are policy, plan, regulation or program activities that the City could undertake to limit impacts. See description of mitigation measures below:

Mitigation Measures

Per WAC 197-11-766, mitigation means to avoid, minimize, rectify, reduce or eliminate, compensate, or monitor the impact and take corrective action. For this programmatic evaluation, three types of mitigation are considered in each section of Chapter 3:

- **Incorporated Plan Features:** Inherent or self-mitigating features of the proposals and alternatives such as current or proposed policies that establish protocols or strategies to reduce impacts.
- **Applicable Regulations & Commitments:** City, Regional, State or Federal laws, rules or programs that are designed to reduce potential impacts such as development regulations

(e.g. zoning and design standards, critical areas regulations, stormwater manual, concurrency ordinance).

- **Other Potential Mitigation Measures:** Additional concepts or ideas that could be considered for inclusion, expansion, or revision in City policies, code, or programs that have the effect of reducing impacts.

3.1 Natural Environment

3.1.1 Natural and Critical Areas

3.1.1.1 Affected Environment

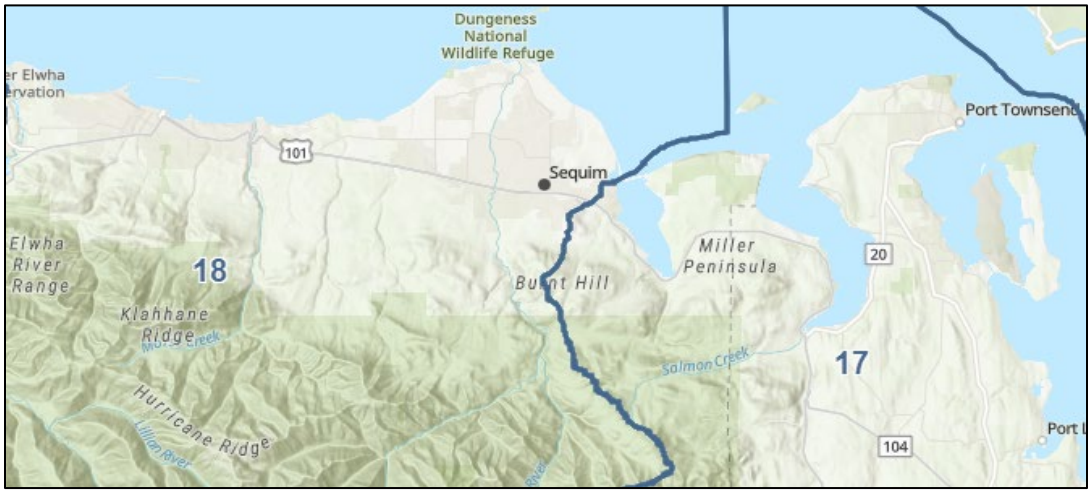
The City of Sequim's varied natural features, such as streams, hillsides, prairies, and shorelines, have shaped the city's character and historical development, and will continue to play an important role as the city grows.

Watershed, Surface, and Groundwater

The Clallam County's Elwha-Dungeness Watershed Plan and Sequim's 2016 Storm and Surface Water Master Plan (SSWMP) serve as primary sources of current conditions and future forecasts for watershed, surface, and groundwater resources within the City.

The majority of Sequim lies within Water Resource Inventory Area (WRIA) 18 for the Elwha-Dungeness watershed, with the easternmost portion of the city within WRIA 17 for the Quilcene-Snow River Basin. WRIA 18 runs from Johnson Creek north to the westernmost end of Washington Harbor. The City's marine shoreline in WRIA 17 runs from Johnson Creek south to the southernmost end of Pitship Marsh, and within the city, it runs directly east into Sequim Bay.

Figure 3.1-1 Water Resources Inventory Area (WRIA) for Sequim

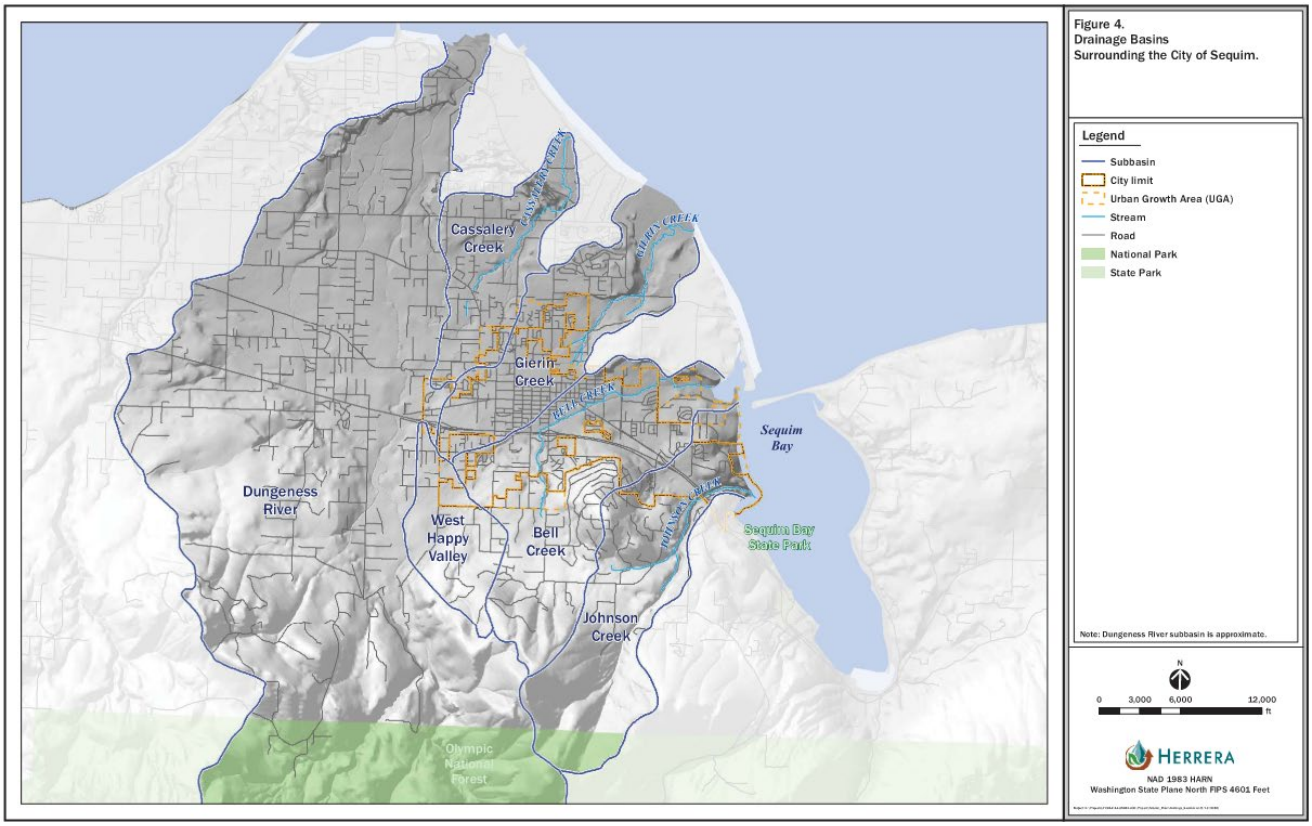


Source: Department of Ecology Watershed look-up - Washington State Department of Ecology

Dungeness River Basin (WRIA 18)

The Dungeness River Basin has six subbasins within and surrounding the City of Sequim: Dungeness River, Cassalery Creek, Gierin Creek. West Happy Valley, Bell Creek and Johnson Creek.

Figure 3.1-2: Drainage Basins Surrounding and Including the City of Sequim



Source: Sequim's 2016 Storm and Surface Water Master Plan, Herrera Environmental Consultants

While all six of these subbasins cross into Sequim City Limits, the Bell Creek and Gierin Creek subbasins cover the majority of the City.

Bell Creek Subbasin

Bell Creek is a small independent drainage within the Dungeness River Basin that flows from the uplands of Happy Valley and the north flank of Burnt Hill through the eastern portion of the City of Sequim. The creek empties into a lagoon at Washington Harbor on the marine shoreline just north of the mouth of Sequim Bay.

The total drainage basin area for Bell Creek is approximately 7.4 square miles, 40 percent of which is located within the city limits. Until recently, the middle and lower reaches of Bell Creek were supplemented with irrigation water from the Dungeness River. Now, Bell Creek is considered an ephemeral stream fed primarily by groundwater and by stormwater. Without

supplementation with Dungeness River flow, the middle reaches of Bell Creek are dry during the summer months.

The water quality data analysis in Sequim's SSWMP shows a declining trend in Benthic Index of Biological Integrity (B-IBI) scores in Bell Creek over time as well as distance downstream, indicating poor water quality. There is also some evidence of elevated nutrient concentrations, elevated dissolved copper concentrations, and likely sources of fecal coliform bacteria.

Geirin Creek Subbasin

Gierin Creek Subbasin is a relatively small independent drainage on the east side of the Dungeness plain, entering salt water between Sequim Bay and the Dungeness River. It is fed by steep-gradient groundwater discharged from the north slopes of the Olympic Mountains.

A large portion of the Sequim Prairie comprises the upper Gierin Creek Basin, which is dominated by flat topography, gravelly soils, and arid climate. Gierin Creek's natural channel rarely has base flow within the city limits. The total drainage basin area is approximately 5.3 square miles, 35 percent of which is located within the city limits where drainage either infiltrates, is controlled by irrigation or SR 101 infrastructure.

Gierin Creek is supplemented directly by Dungeness River water conveyed in irrigation ditches during the summer, and receives stormwater carried in these irrigation ditches during the winter. Groundwater recharge in this basin is of particular importance, since a portion of the basin is comprised of wetlands that are fed by groundwater.

In-stream monitoring data were not available for the main stem of Gierin Creek; however, there is some fecal coliform data for Eureka Ditch (a tributary to Gierin Creek), which increases in concentration during storm events.

The Dungeness Water Rule

The Dungeness Water Rule was adopted in late 2012 to protect flows in a critical basin for endangered fish and covers the entirety of the Dungeness River Basin, and include:

- Setting instream flow levels for the Dungeness River mainstream, tributaries, and independent drainages.
- Requiring mitigation for any new groundwater withdrawals, including permit-exempt wells, and providing for a water exchange to facilitate mitigation.
- Closing streams year-round or seasonally.
- Establishing reserves for in-house domestic uses.

The Dungeness Water Rule requires mitigation for new groundwater withdrawals, and since the rule took effect in January 2013, people building new homes have purchased mitigation certificates from the Dungeness Water Exchange.

The Dungeness watershed currently has four fish species listed as threatened under the federal Endangered Species Act. Dungeness Chinook are one of the five key populations of Chinook identified as in need of restoration in Puget Sound. Low river flows, particularly in summer and early fall, impact these fish. The Dungeness Water Rule was created in part to protect instream flows that are needed to support salmon populations and other instream values, while allowing new residential development through mitigated use of water from permit-exempt wells.

Sequim Bay Subbasin (Quilcene-Snow River – WRIA 17)

The Sequim Bay Subbasin of the Quilcene-Snow River basin covers the easternmost portion of the City of Sequim. Sequim Bay is located in the northern and westernmost portions of WRIA 17, bordering WRIA 18 to the west. This portion of WRIA17 has been incorporated into the WRIA 18 watershed plan under a Memorandum of Agreement between the WRIA 17 Planning Unit and WRIA 18 Initiating Governments dated December 9, 1998. The portions of WRIA 17 included in the WRIA 18 Watershed Plan include Sequim Bay, Johnson Creek, Dean Creek, Jimmycomelately (JCL) Creek, Chicken Coop Creek, and other small streams draining into Sequim Bay.

Johnson Creek is the primary creek in the Sequim Bay Subbasin that is within the City of Sequim, and is the third largest stream in the Sequim Bay watershed. Johnson Creek flows in a northeast direction from the foothills of the Olympic Mountains into the west side of Sequim Bay at Pitship Point (near the John Wayne Marina). The total drainage basin area for Johnson Creek is approximately 6.3 square miles, 14 percent of which is located within the city limits.

The water quality data analysis is Sequim's SSWMP shows a declining trend in B-IBI scores in Johnson Creek; however, it is not as notable as what has been observed in Bell Creek.

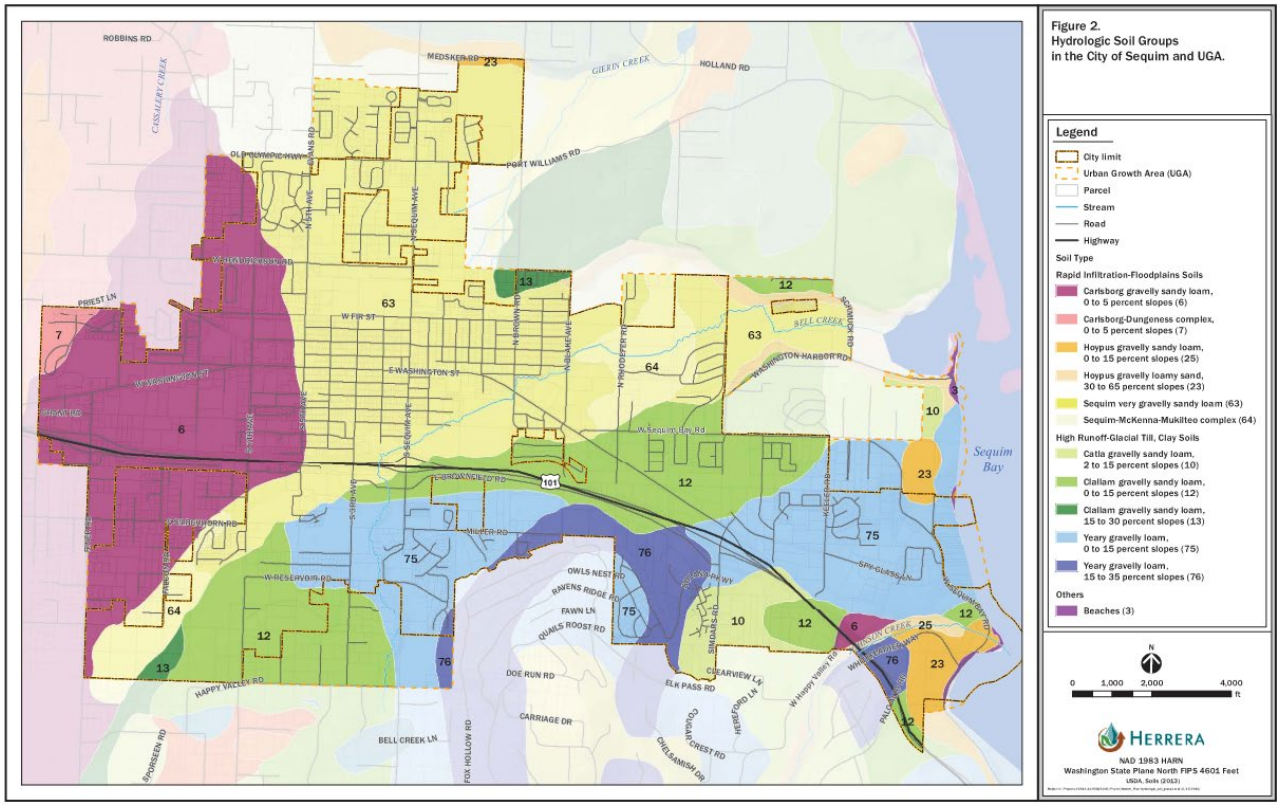
Topography and Soils

The majority of Sequim is generally flat, with elevations gently sloping between 120 and 220 feet in elevation. South of State Route 101 (SR 101), elevations climb to over 1,000 feet towards the peak of Bell Hill, located outside of the City limits. North of SR 101 and east towards Sequim Bay, Bell Creek creates a valley with elevation gradually decreasing to sea level at the Lagoon north of Washington Harbor, located outside of City limits. This lowland area is bordered north and south with small hills with elevations around 200 feet above sea level.

The soils in the city consist of floodplain soils, intermixed zones of glacial till, and wetland bogs. The majority of the city is dominated by Sequim (37 percent), Sequim-Carlsborg (19 percent), and Hoypus (3 percent) soils; these are floodplain soils that formed in coarse-textured alluvium or glacial outwash that have high infiltration capacities. These soils are generally most suitable for stormwater infiltration applications.

The remainder of the mapped soils in the city include, Yeary (21 percent), Clallam (17 percent), Catla (2 percent), and Beaches (1 percent); these are sandy or silty soils characterized by low permeability and relatively high runoff potential. These are less suitable for stormwater infiltration applications.

Figure 3.1-3: Hydrologic Soil Groups in the City of Sequim



Source: Sequim's 2016 Storm and Surface Water Master Plan, Herrera Environmental Consultants

Critical Areas

The GMA requires every county and city to adopt policies and development regulations that designate and protect critical areas (RCW 36.70A.060(2)), which are defined, mapped (to the greatest extent feasible), and regulated in the City's Critical Areas Ordinance (CAO). Critical areas are defined in RCW 36.70A.030(5) as: Wetlands; Areas with a Critical Recharging effect of Aquifers used for potable water; Frequently Flooded Areas; Geologically Hazardous Areas; and Fish and Wildlife Habitat Conservation Areas.

Wetlands

Wetlands are designated critical areas that are features of the landscape and the local hydrologic cycle. Wetlands reduce floods, contribute to stream flows, improve water quality, provide fish and wildlife habitat, and offer opportunities for research and scientific study and outdoor education. Each wetland provides various beneficial functions, but not all wetlands perform all functions, nor do they perform all functions equally well. Large wetlands, and those hydrologically associated with lakes and streams, have relatively more important functions in the watershed than small, hydrologically isolated wetlands.

Wetlands in Sequim are regulated through Chapter 18.80 SMC – Critical and Environmentally Sensitive Areas Protection. SMC 18.80.070(F) provides the required buffer widths based on wetland category and habitat score, per the Department of Ecology's Wetland Rating System for Western Washington. Figure 3.1-7 below identifies the locations of known wetlands within the city. Larger concentrations of wetlands are found surrounding Bell Creek, with smaller patches of wetlands found primarily found in the southwest areas of the city.

Wellhead Protection Areas and Critical Aquifer Recharge Areas

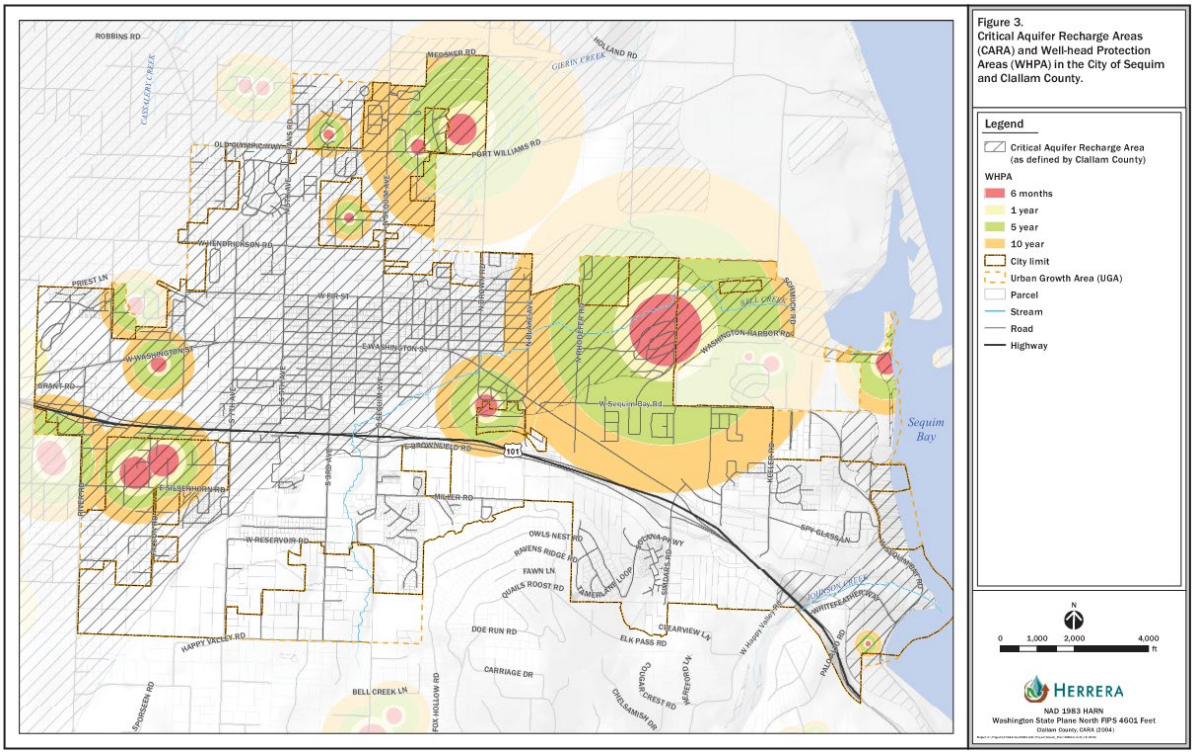
Sensitive groundwater areas in the city include Wellhead Protection Areas (WHPAs) and Critical Aquifer Recharge Areas (CARAs).

Wellhead Protection Areas are the surface and subsurface area surrounding a groundwater source through which potential contamination can travel and eventually reach the source.

Critical Aquifer Recharge Areas are defined as “areas with a critical recharging effect on aquifers used for potable water, including areas where an aquifer that is a source of drinking water is vulnerable to contamination that would affect the potability of the water, or is susceptible to reduced recharge” (WAC 365-190-030). High vulnerability is indicated by land uses that contribute to contamination that may degrade groundwater and hydrogeological conditions that facilitate degradation. Low vulnerability is indicated by land uses that do not contribute contaminants that degrade ground water and those conditions that do not facilitate digression. A majority of the city is designated as a High Aquifer Recharge Area.

Because WHPAs identify areas where land use is carefully regulated to avoid contamination of drinking water, groundwater in these areas should already be protected. Future development in WHPAs and CARAs is regulated as a critical area through Chapter 18.80 SMC.

Figure 3.1-4: Critical Aquifer Recharge Areas and Well-head Protection Areas



Source: Sequim's 2016 Storm and Surface Water Master Plan, Herrera Environmental Consultants

Frequently Flooded Areas

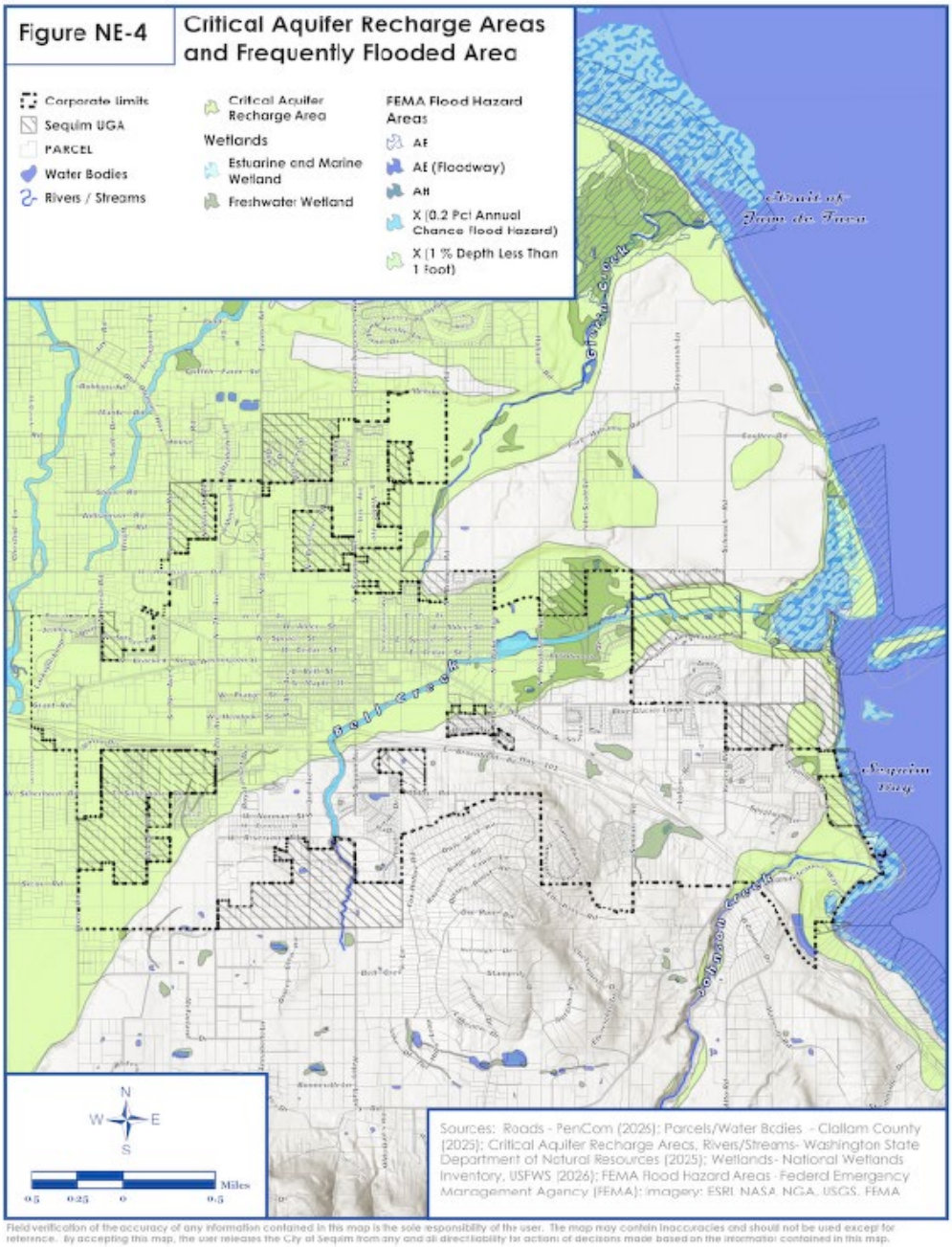
Frequently flooded areas are lands in the floodplain subject to at least a one percent or greater chance of flooding in any given year, or within areas subject to flooding due to high groundwater. These areas include, but are not limited to, streams, rivers, lakes, coastal areas, wetlands, and areas where high groundwater forms ponds on the ground surface.

FEMA delineates flood hazards along major river and stream corridors to identify areas at risk from floodwater. This information is used for both floodplain management and insurance rating. FEMA maps have been adopted by the City. The mapping includes those areas inundated by 100-year and 500-year floods.

As shown in Figure 3.1-5, the areas surrounding Bell Creek are at the greatest risk of flooding. The majority of this area is designated "Zone X" by the FEMA Flood Hazard Areas, which is expected to have a 0.2 percent to one percent (0.2-1.0%) annual chance of flooding, with an average depth of less than one foot. Areas along Bell Creek, including between SR 101 and E Washington Street, and between the eastern city limits and Sequim Bay, are designated as "AE Zones" which has greater than one percent annual chance of flooding events.

Frequently flood areas in Sequim are regulated through Chapter 8.36 SMC – Flood Damage Prevention. This chapter provides additional development standards applicable to frequently flooded areas, including restrictions on storage of materials and equipment, construction materials and methods, and regulations on habitat and livestock activity.

Figure 3.1-5: Frequently Flooded Areas



Geologically Hazardous Areas

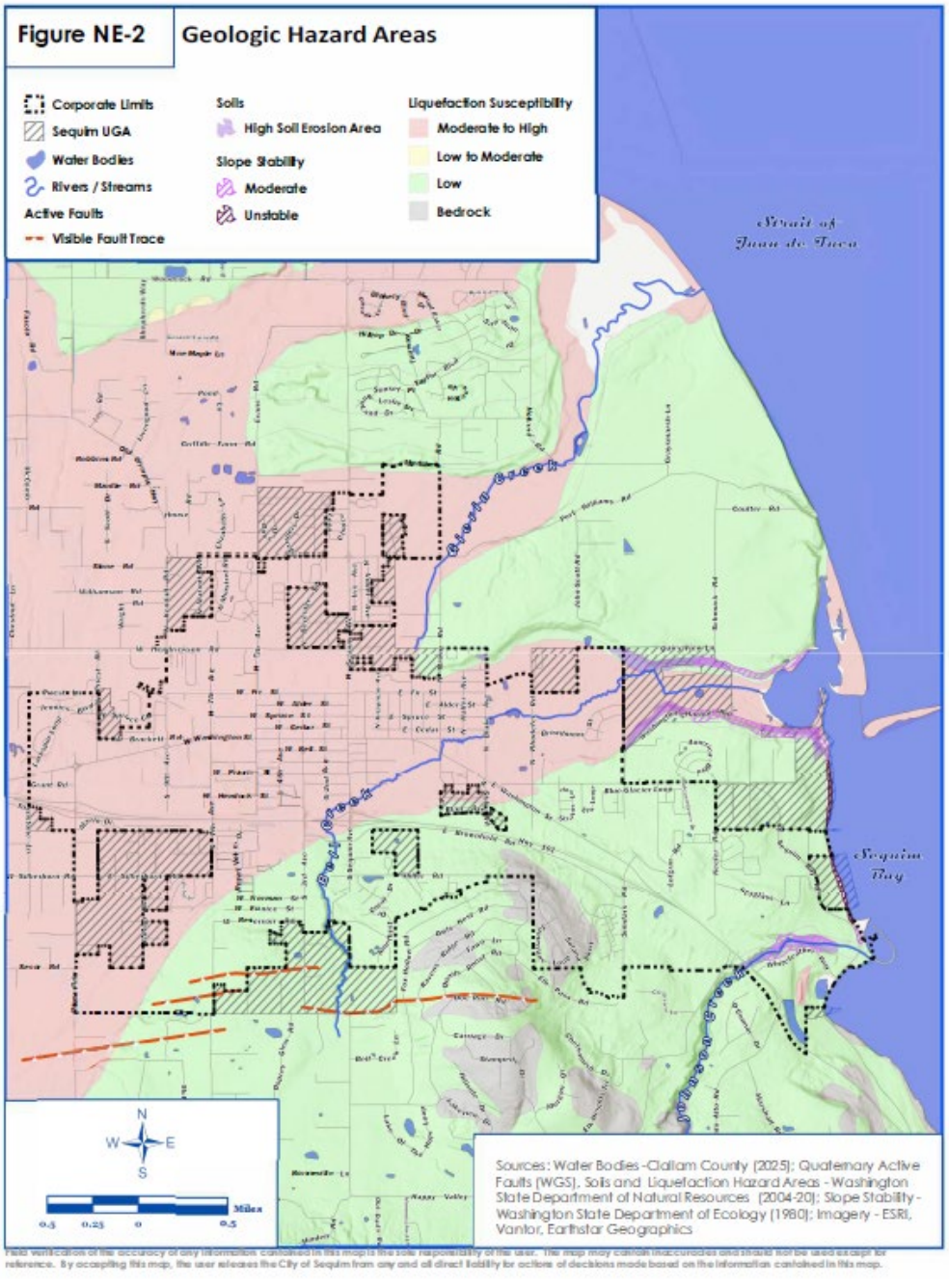
Geologically hazardous areas are places highly susceptible to erosion, landslides, earthquakes, or other geologic events. Geologically Hazardous Areas and Areas of Geologic Concern are identified in Figure 3.1-6. With the topography of the city being primarily flat with gentle elevation changes, the areas identified as potential erosion hazards are generally concentrated around Bell Hill and the hills to the north and south of the Bell Creek valley.

Unstable bluffs are identified along the northern and southern hills of the Bell Creek valley, though these areas are located outside of the city limits. Similarly, the banks surrounding Johnson Creek are also identified as unstable bluffs. These are typically areas with steep

elevations and loose sediment, such as gravel, clay, or sand, making them particularly susceptible erosion caused to currents and waves.

Figure 3.1-6 also includes liquefaction susceptibility data, which measures the likelihood for soils to lose strength and behave as a liquid during an earthquake. The northwestern portion of the city, including the majority of downtown, has moderate to high liquefaction susceptibility; whereas the southeast portion of the city has a very low liquefaction susceptibility. Geologically hazardous areas, ravines, and bluffs in Sequim are regulated through Chapter 18.80 SMC. SMC 18.80.070(C) specifically sets and buffer width of 50 feet from the top and toe of a designated geological hazard area, and identifies specific alteration standards, including construction BMPs, wet weather plans, required seasons for groundwork (during dry seasons), and erosion control measures during and after construction activities. Similarly, SMC 18.80.070(B) sets a required 50-foot buffer for all ravines, and points to the City's shoreline master program for marine bluff regulations.

Figure 3.1-6: Geologically Hazardous Areas

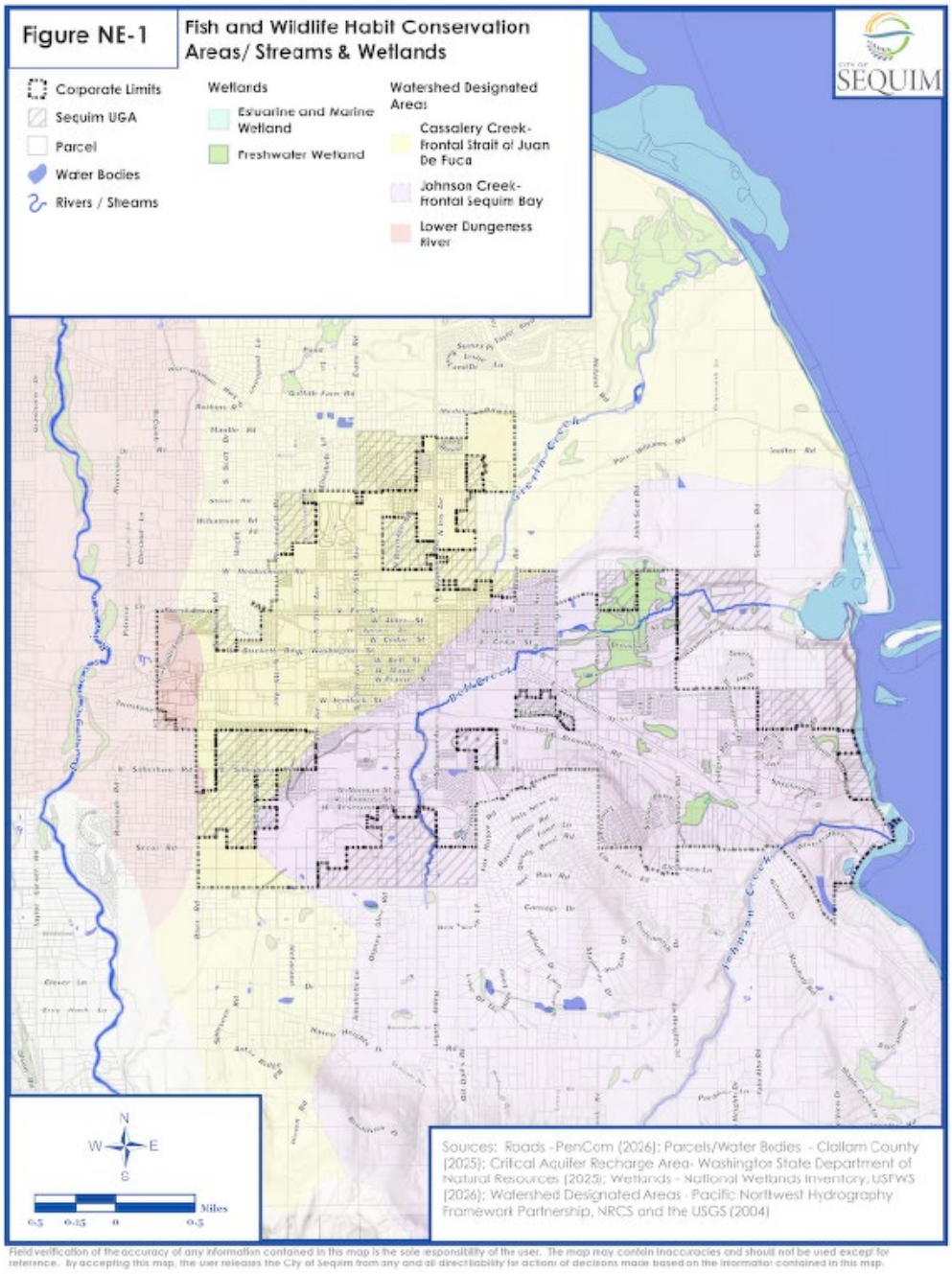


Field verification of the accuracy of any information contained in this map is the sole responsibility of the user. The map may contain inaccuracies and should not be used except for reference. By accepting this map, the user releases the City of Sequim from any and all direct liability for actions or decisions made based on the information contained in this map.

Fish and Wildlife Habitat Conservation Areas

Fish and wildlife habitat conservation is the land for maintaining population of species in suitable habitats within their natural geographic distribution so that the habitat available is sufficient to support viable populations over the long term and isolated subpopulations are not created. Fish and wildlife habitat conservation areas contribute to the state's biodiversity and occur on both publicly and privately-owned lands.

Figure 3.1-7: Fish and Wildlife Habitat Conservation Areas



Rivers and streams are an important fish and wildlife habitat, and all identified streams in the city are classified according to the Washington State stream classification systems. The City's Critical Areas Ordinance defines stream types and provides special consideration of anadromous fisheries.

There are three primary streams that run through the City of Sequim:

- Gierin Creek - No fish habitat has been identified in the Gierin Creek basin within the city or its UGA; however, fish utilization of the channel within the City limits has been reported.

- Bell Creek - The Jamestown S'Klallam Tribe monitors Coho, steelhead, and cutthroat salmon outmigration in Bell Creek, and federal assessments designate most of Bell Creek from the mouth to the crossing of the Highland Irrigation canal as critical habitat for threatened/endangered bull trout (USFWS 2010). A critical habitat designation is also proposed for Puget Sound steelhead in Bell Creek.
- Johnson Creek - Johnson Creek is considered suitable habitat for salmonids and is designated critical habitat for bull trout by the United States Fish and Wildlife Service (USFWS 2010). A critical habitat designation is also proposed for Puget Sound steelhead in Johnson Creek.

Streams within Sequim are regulated through Chapter 18.80 SMC, with SMC 18.80.070(A) providing specific buffer requirements based on stream typology.

Washington State Department of Fish and Wildlife (WDFW) has developed a catalog of habitats and species considered to be priorities for conservation and management. WAC 365-190-130(4) strongly suggests that local jurisdictions base their fish and wildlife habitat conservation areas designation on the WDFW priority habitat and species listings.

According to the WDFW Priority Habitats and Species List priority species include Federal and State Endangered, Threatened, Sensitive, and Candidate species; animal aggregations (e.g. heron colonies, bat roost sites) considered vulnerable; and species of recreational, commercial, or tribal importance that are vulnerable. These priority species require protective measures for their survival due to their population status, sensitivity to habitat alteration, and/or recreational, commercial, or tribal importance.

Priority habitats are habitat types or elements which offer unique or significant value to a diverse assemblage of species. A priority habitat may consist of a unique vegetation type or dominant plant species, a described successional stage (such as old-growth forest), or a specific habitat feature.

The Northern Spotted Owl, Taylor's Checkerspot butterfly, Little Brown Bat, and Yuma Myotis bat, all identified on the State and Federal endangered and threatened species list, have been found in and around Sequim.

Within Clallam County, the Olympic Mudminnow and Pygmy Whitefish are listed on the Washington State's Sensitive Species list, with the River Lamprey, Bull Trout, and Steelhead Trout as candidates. In addition, the Green Sturgeon, Eulachon, Chum Salmon, Bocaccio Rockfish, and the Yelloweye Rockfish are fish species found in the County that are designated threatened or endangered by the State.

The WDFW Priority Habitat and Species program also includes Roosevelt elk, like those in the Sequim herd, as priority species within certain habitats. Priority habitats for elk include calving areas, migration corridors and winter and summer range.

Shoreline

Sequim's Shoreline Master Program (SMP) establishes shoreline environment designations to regulate the land uses, access, and environmental protections for shorelines of the state and areas within the 200-foot regulatory shoreline jurisdiction.

There are six different designations in total: Aquatic, Natural, Research, Shoreline Residential, Urban, and Urban Conservancy. For each shoreline designation the SMP specifies shoreline standards, including building height, marine buffers, and building setbacks, allowed and prohibited uses, and permit requirements. In general, utilities (including stormwater management facilities) may be permitted within all of the shoreline environment designations, except that in natural and aquatic environments they may be permitted as a conditional use only.

Figure 3.1-8: Shoreline Environments



3.1.1.2 Impacts

3.1.1.2.1 Impacts Common to Both Alternatives

Streams, wetlands, frequently flooded areas, geologically hazardous areas, critical aquifer recharge areas and shorelines are located throughout the city, and new and redevelopment development could have impact on these resources if it occurs in proximity to these resources. The development growth associated with both alternatives would likely result in increased hard surfaces, increased vehicle use, and decreased vegetation, all of which may negatively impact critical areas. Also, impaired water exists throughout the city and future development or redevelopment around impaired waters could provide an opportunity to improve water quality through improved stormwater treatment compared to what currently exists. Finally, construction activities associated with development and redevelopment can involve removal of vegetation and soil disturbance, causing potential erosion and water quality impacts.

3.1.1.2.2 Impacts of No Action and Action Alternatives

No Action Alternative

Impacts to wetlands, fish and wildlife habitat conservation areas, critical aquifer recharge areas, and shorelines from continued development are expected to be generally proportional to the amount of new impervious surface created. Additional impervious surfaces associated with development under the No Action Alternative could degrade water quality through increased nonpoint stormwater runoff and potential point source contamination. As described under Impacts Common to All Alternatives, clearing and grading associated with development may increase sediment transport to surface waters, while development on properties containing critical areas could reduce wetland and riparian habitat functions and values. Continued growth in areas with geologic hazards, such as erosion or landslide hazard areas, may also increase exposure to climate-related hazards.

Action Alternative

Impacts on critical areas would be generally consistent with impacts described Common to Both Alternatives and No Action Alternative. Action Alternative provides new opportunities for residential development in mixed use land use classification/zoning districts within already developed portions of the city and residential density in residential land use classification/zoning district.

3.1.1.2.3 Summary of Impacts

Under both alternatives, additional growth and development will occur over time. This transition is unavoidable, but it is not considered a significant or adverse impact within an urban area where growth is required to be focused under the GMA and CPPs. Under both Alternatives, moderate unavoidable impact is anticipated on water quality and increased surface runoff, as more impervious surfaces are anticipated. Regulatory requirements found

in the City's critical areas ordinance and stormwater management requirements apply under both Alternatives.

Threshold	No Action Alternative	Proposed Action Alternative
Increased risk of geologic hazards	✕	✕
Reduces water quality or increases surface runoff	✕	✕
Loss of wetland and stream habitat	✕	✕
Loss of local critical area functions and values	✕	✕
Increase intensity along shoreline	✕	✕

Table Key:
✕ No or Low Potential for Adverse Impact
+ Moderate Potential for Adverse Impact
+ High Potential for Adverse Impact

3.1.1.3 Mitigation Measures

Comprehensive Plan Policies

The Action Alternative 2025 Comprehensive Plan Land Use and Natural Environment Chapter include numerous goals and policies to protect critical areas consistent with the requirements of the GMA, that guide future growth that minimizes impacts. The proposed Natural Environmental goals and policies address environmental stewardship, critical areas, shorelines, energy and sustainability and urban forestry.

Regulations

Specific measures to mitigate impacts on critical areas are included in the following regulations:

Local

- Stormwater Management - SMC Chapter 13.104
- Floodplain Management - SMC Chapter 8.36
- Critical Areas Regulations - PMC Chapter 18.70 and 18.80
- Shoreline Master Program – SMC Title 19
- Project-level SEPA Review - SMC Chapter 16.04
- Elwha-Dungeness Watershed Plan

State

- Water Quality Standards for Surface Waters
- Water Quality Standards for Groundwater
- Flood Control Management Act
- Water Pollution Control Act
- Shoreline Management Act

- National Pollutant Discharge Elimination System Construction Stormwater General Permit
- Stormwater Management Manual for Western Washington
- WSDOT Highway Runoff Manual
- WSDOT Hydraulics Manual
- Washington State Hydraulic Code

Federal

- Clean Water Act Section 404
- Coastal Zone Management Act
- Section 14 of the Rivers and Harbors Act
- National Flood Insurance Act of 1968 and Flood Disaster Protection Act of 1973
- Floodplain Management Presidential Executive Order 11988
- Endangered Species Act (ESA) Biological Opinion for the Implementation of the National Flood
- Safe Drinking Water Act
- Marine Mammal Protection Act
- Endangered Species Act Section 7 Consultation

Other Potential Mitigation Measures

The following mitigation measures would further reduce impacts from those described but are not necessary to prevent significant adverse impacts:

- Retrofits: Transportation improvement projects and improved developments can enhance downstream water quality by incidental flow control and water quality treatment of stormwater from older road sections currently untreated or lacking basic treatment designs.
- Low Impact Development (LID): Use of LID techniques such as permeable surfaces and other on-site infiltration methods can improve on-site storage capabilities, reduce impact from increased high flows, and provide water quality benefits.
- Long-Term Impacts: Mitigation of long-term stormwater impacts includes inspection and maintenance of stormwater facilities for flow control, conveyance, and water quality treatment.
- Infrastructure Planning: The city's infrastructure planning can increase system resiliency and reduce anticipated stressors.

3.1.1.4 Significant Unavoidable Adverse Impacts

The development and growth associated with either alternative would likely result in increased hard surfaces, increased vehicle use, and decreased vegetation, all of which can negatively impact critical areas. Compliance with applicable policies and regulations will provide mitigation for either alternative under the City's stormwater management codes, critical areas codes, and shoreline master programs, as applicable. Therefore, no significant unavoidable adverse impacts to critical areas are expected.

3.1.2 Air Quality

3.1.2.1 Affected Environment

Clallam County falls under the jurisdiction of the Olympic Region Clean Air Agency (ORCAA), the regional agency responsible for administering federal, state, and local air quality regulations within Clallam, Grays Harbor, Jefferson, Mason, Pacific, and Thurston counties. ORCAA is responsible for monitoring ambient air quality, implementing air pollution control regulations, issuing permits for regulated emission sources, enforcing air quality standards, and providing public education regarding air quality and smoke management.

Air Quality

ORCAA continuously monitors regional air quality and reports conditions using the Air Quality Index (AQI), which provides a standardized measure of ambient air quality and associated health risks. AQI values are categorized from "Good" (0–50) to "Hazardous" (301–500). Air quality within Clallam County is generally considered good and meets the National Ambient Air Quality Standards (NAAQS) established by the U.S. Environmental Protection Agency (EPA) for the six criteria pollutants: carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter (PM_{10} and $PM_{2.5}$), and sulfur dioxide. Clallam County is currently designated as an attainment area for all federal criteria pollutants, indicating that monitored pollutant concentrations comply with applicable federal and state health-based air quality standards.

The primary contributors to air emissions within the Sequim area are mobile sources, including automobiles and freight traffic on major transportation corridors such as US Highway 101, along with residential wood burning, outdoor burning where permitted, construction activities, and emissions associated with commercial and institutional development. Unlike more urbanized areas of Washington, Clallam County has relatively limited industrial emission sources. Consequently, background pollutant concentrations are generally low, and air quality is strongly influenced by meteorological conditions, including wind patterns that promote dispersion of pollutants.

Air quality can periodically be affected by regional wildfire smoke during late summer and early fall. Smoke transported from wildfires within Washington, British Columbia, or other western states can elevate concentrations of fine particulate matter ($PM_{2.5}$), resulting in temporary AQI advisories issued by ORCAA and the Washington State Department of Ecology. These events are episodic and typically short in duration but may result in reduced visibility and temporary health concerns for sensitive populations, including children, older adults, and individuals with respiratory or cardiovascular conditions.

Greenhouse Gas Emissions

Gases that absorb and trap heat in the atmosphere are called “greenhouse gases.” As the amount of greenhouse gases in our atmosphere increases, the amount of heat trapped in the atmosphere also increases, causing the overall warming of the planet. The various impacts

from this warming are referred to as climate change. Washington state has established statewide targets to reduce emissions of GHG to 1990 levels by 2000 and to 95 percent below 1990 levels by 2050. The state has established benchmarks for reducing per capita vehicle miles traveled (VMT) by 50 percent from a baseline of 75 million by 2050, recognizing that the transportation sector is the largest contributor of GHG in the state.

The Washington State Department of Ecology (Ecology) prepares the official statewide greenhouse gas inventory to estimate emissions from all sectors of the economy and to track progress toward the state's statutory greenhouse gas emission reduction limits. Although no greenhouse gas inventory has been prepared specifically for the City of Sequim or Clallam County, statewide inventories provide an appropriate basis for evaluating existing conditions and understanding the principal sources of emissions that may be affected by future growth and development.

According to Ecology's most recent statewide inventory, transportation is Washington's largest source of greenhouse gas emissions, accounting for approximately 40 percent of total emissions, followed by building energy use, electricity consumption, industrial processes, agriculture, and waste management. Washington's greenhouse gas emissions have generally declined since peaking in 2000, despite continued population and economic growth, reflecting increased energy efficiency, greater use of renewable energy, and implementation of state climate policies.

3.1.2.2 Impacts

Air quality impacts would primarily be associated with construction activity, residential wood burning and vehicle traffic. Dust from excavation and grading and use of construction equipment would contribute to the ambient concentrations of suspended particulate matter and short-term odors on a localized basis.

Wood-burning appliances (wood stoves, fireplace/inserts) can cause elevated concentrations of air pollutants during periods of poor dispersion. Residential development, therefore, can represent a source of carbon monoxide and respirable particulate matter. The use of lower emission fuels than wood can reduce the level of impact attributed to new development.

Automobile emissions are one of the greatest contributors to air quality. Emissions associated with motor vehicles include hydrocarbons, carbon monoxide, and nitrogen oxides. These emissions would tend to increase along with population growth, vehicle miles traveled and traffic congestion. Because transportation and building energy use are the largest contributors to statewide emissions, future greenhouse gas emissions are expected to be influenced primarily by vehicle miles traveled and energy consumption associated with residential and commercial development.

3.1.2.2.1 Impacts Common to Both Alternatives

Both alternatives consider housing and employment growth within the city limits, where there are multimodal approaches to transportation and a variety of residential, commercial, and industrial land uses.

Several common impacts to air quality that would occur under both alternatives: (1) emissions from construction of infrastructure or private projects, including changes to land use, (2) emissions from increased traffic due to population and employment growth (which would continue to be the single largest air pollutant source category), and (3) exposure to particulate matter from wildfire smoke.

Construction would occur under both alternatives, with the potential amount varying generally with distribution of population. During construction, fugitive dust from grading and excavation would temporarily raise ambient PM concentrations. Heavy construction machinery, big diesel vehicles, and other smaller equipment like portable generators would all be required for construction. Tailpipe emissions from these vehicles would temporarily degrade air quality near the construction sites, but their impacts would typically be outweighed by existing emissions from cars and trucks in the neighborhoods surrounding the construction site.

Some phases of construction (e.g., installation of new paving) would cause temporary odors detectable to some people close to the construction sites. Construction equipment and material hauling can affect traffic flow near the construction sites. If construction were to delay traffic enough to significantly reduce travel speed, then general traffic-related emissions would temporarily increase.

Development under both alternatives would result in emissions from increased on-road traffic due to population and employment growth. As reported by the Ecology, on-road vehicle emissions are a significant contributor to the region's greenhouse gas emissions.

Under both alternatives, wildfire smoke would be a concern, with moderate and poor air quality connected to the rise in the number of wildfires in the region, and the smoke and particulate matter they produce.

3.1.2.2.2 Impacts of No Action and Action Alternatives

No Action Alternative

No Action Alternative assumes changes to land use due to construction will still occur. Vehicular traffic is assumed to be greater than Action Alternative due to its dispersed distribution of housing growth and lack of multi-modal transportation projects included in the Action Alternative, intended to improve active/non-motorized transportation facilities.

Action Alternative

Impacts on air quality would be generally consistent with impacts described Common to Both Alternatives and No Action Alternative. Action Alternative provides new opportunities for residential development in mixed use land use classification/zoning districts and residential

in residential land use classification/zoning district. Emissions from single-family occupancy vehicles could be anticipated to be lower in the Action Alternative due to increased residential opportunities in mixed use land use/zoning districts, nearer to employment hubs, transit, and active transportation/non-motorized transportation facilities.

3.1.2.2.3 Summary of Impacts

Under both alternatives, additional growth and development will occur over time, resulting in increased construction activities and vehicle travel. This transition is unavoidable, but it is not considered a significant or adverse impact within an urban area where growth is required to be focused under the GMA and CPPs. Existing air quality conditions within Sequim and Clallam County are characterized by generally good ambient air quality with attainment of federal and state air quality standards.

Threshold	No Action Alternative	Proposed Action Alternative
Causes localized air quality to exceed the national Ambient Air Quality Standards	⊗	⊗

Table Key:
⊗ No or Low Potential for Adverse Impact
⊕ Moderate Potential for Adverse Impact
⊕ High Potential for Adverse Impact

3.1.2.3 Mitigation Measures

Comprehensive Plan Policies

The Action Alternative 2025 Comprehensive Plan Land Use, Transportation, Natural Environment and Climate and Resiliency Chapters include numerous goals and policies to encourage active/non-motorized transportation facilities, public transit, increased densities near employment hubs and multimodal transportation choices.

Applicable Regulations

Washington State Clean Energy Transformation Act (2019)

All electric utilities must phase out coal-fired electricity from their state portfolios by 2025. By 2030, their portfolios must be greenhouse gas emissions neutral, which means they may use limited amounts of electricity generated from natural gas if it is offset by other actions. By 2045, utilities must supply Washington customers with electricity that is 100% renewable or non-emitting with no provision for offsets.

Motor Vehicle Emission Standards (2020)

Zero-Emission Vehicles This law gradually increases the number of new zero-emission vehicles (ZEV) sold in Washington, until all new vehicles meet the ZEV standard starting in 2035. Plug-in hybrid vehicles, which combine a gas engine with a battery-electric system, will qualify for the 2035 ZEV standard as long as they can travel at least 50 miles on battery power. The requirements will take effect in 2024, with the release of model year 2025 vehicles.

Washington State Climate Commitment Act (2021)

Washington State has established statewide targets to reduce emissions of GHG to 1990 levels by 2000 and to 95 percent below 1990 levels by 2050. The state has established benchmarks for reducing per capita vehicle miles traveled (VMT) by 50 percent from a baseline of 75 million by 2050, recognizing that the transportation sector is the largest contributor of GHG in the state. In 2021, the Washington State Climate Commitment Act was signed into law, which, among other things, establishes a "cap and invest" program. In 2021 the Clean Fuel Standard was also signed into law, requiring the carbon intensity of fuels to be reduced by 20% by 2038. The Washington State Legislature also provided direction related to EV infrastructure, including the adoption of building codes and development of tools for forecasting charging infrastructure needs. These actions in 2021 build upon previous state actions spurring the advancement of a zero-emission transportation system.

Washington State Clean Fuel Standard Act (2021)

The Clean Fuel Standard statute will cut statewide greenhouse gas emissions by 4.3 million metric tons a year by 2038. The law requires improving the efficiency of fuel production processes, production of low-carbon biofuels into the fuel, and purchasing credits generated by low- carbon fuel providers, including electric vehicle charging providers.

Hydrofluorocarbons Emissions Reduction (2021)

This statute transitions Washington away from using some of the most potent greenhouse gases known as hydrofluorocarbons (or HFCs) in products and equipment.

Washington State HB 1181 (2023)

Adds a climate change and resiliency element to the list of elements that must be included within the comprehensive plans.

Local Mitigation Measures

At the local level, mitigating measures include: 1) Construction impacts may be reduced with the requirement for dust suppression in the forms of containment via suspended plastic sheeting, watering dry dirt roads and work areas, and suspending work during windy or extremely dry periods; 2) Encourage home heating with wood burning appliances to optimize energy efficiency and cleanliness. 3) Zoning regulations that encourage mixed-use pedestrian and transit-oriented neighborhoods may help reduce reliance on vehicles; 4) Transportation Demand Management (TDM) strategies promoting multi-modal and alternative transportation options, such as walking, bicycling, riding transit, carpooling, and

working from home can be implemented to enhance the capacity of the transportation network and reduce vehicle emissions.

3.1.2.4 Significant Unavoidable Adverse Impacts

The development and growth associated with both alternatives would likely result in increased air pollution and greenhouse gases. Compliance with applicable federal and state regulations and policies will provide mitigation for each alternative. Therefore, no significant unavoidable adverse impacts to air quality are expected.

3.1.3 Climate and Hazard Mitigation

3.1.3.1 Affected Environment

Sequim experiences a temperate marine climate influenced by the Pacific Ocean and the Olympic Mountains. Unlike much of western Washington, Sequim lies within the Olympic Mountain rain shadow, resulting in one of the driest climates in the state. Annual precipitation averages approximately 16 to 18 inches, compared to well over 100 inches in portions of western Clallam County. Summers are generally warm and dry with low humidity, while winters are cool with periodic rainfall, windstorms, and occasional snow and ice. Although the Sequim's relatively dry climate contributes to favorable living conditions, prolonged summer drought and increasing temperatures create conditions that may be influenced by changes in climate.

Recent planning efforts recognize that climate conditions are changing throughout the Olympic Peninsula. The Clallam County 2024 Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) incorporates current climate science and identifies increasing temperatures, more frequent extreme heat events, changing precipitation patterns, heavier winter storm events, longer summer dry periods, sea level rise, and increasing wildfire potential as trends expected to affect communities throughout the county. The Hazard Mitigation Plan notes that climate change acts as a hazard multiplier by increasing the frequency or severity of many natural hazards while also increasing risks to vulnerable populations, public infrastructure, and critical community services.

The City of Sequim participated in the 2024 Clallam County Multi-Jurisdictional Hazard Mitigation Plan along with Clallam County, the Cities of Port Angeles and Forks, tribal governments, and regional special purpose districts. The purpose of the Hazard Mitigation Plan is to identify hazards affecting participating jurisdictions, evaluate community vulnerability, and establish mitigation strategies that improve long-term resilience while reducing risks to people, property, public infrastructure, and the environment. The 2024 update significantly expanded previous planning efforts by incorporating climate resilience, environmental justice, socially vulnerable populations, quantitative climate change analysis, and additional hazard categories beyond those included in the previous 2019 plan.

Sequim Climate Hazard Assessment and Ranking

The Vulnerability and Risk Assessment component of the 2024 MJHMP provides an account of previous natural hazards that have affected Sequim and establishes a hazard ranking for each type of hazard based on the probability of it happening again or continuously, how large the impact is expected to be, and the number of areas it will affect.

The most probable hazards identified are wildfire smoke and drought, with a "high" rank. Severe weather, including windstorms and extreme heat, flooding, and utility failures, all ranked "medium".

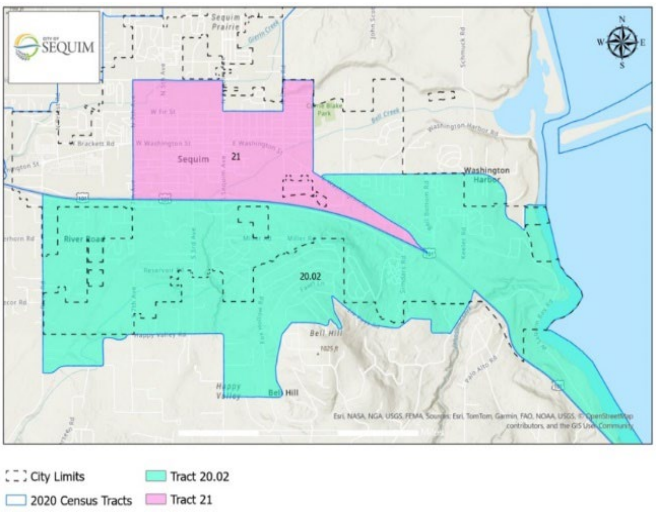
Table 3.1.3-1 Sequim Climate Hazard Assessment and Ranking

Hazard Type	Hazard Planning Prioritization Consideration
Wildfire Smoke	High
Drought	High
Severe Weather - Windstorm	Medium
Utility Failure/Power Outage	Medium
Severe Weather – Extreme Heat	Medium
Flood	Medium
Wildfire	Low
Landslide	Low

Source: City of Sequim Annex, MJHMP Volume 2, 2024, Table 3-3

In addition to potential physical or geographic hazards, socially vulnerable populations (the people most susceptible to the immediate effects of hazards) were also identified using the Centers for Disease Control and Prevention (CDC) and the Washington State Department of Health Social Vulnerability Index (SVI).

Figure 3.1.3-1 Census Tracts 20.02 and 21



Determining vulnerable populations was based on census tracts and concentrations of certain demographics within them. Sequim's Census Tract 20.02 (green) was identified as medium-high vulnerability, and Census Tract 21 (pink) was identified as high vulnerability. These census tracts generally included concentrations for the following indicators of social vulnerability identified by Washington's SVI:

- Persons with income below 150% of the poverty rate;
- Persons aged 65 or older;
- Civilian noninstitutionalized population with a disability;
- Persons reporting minority status; and
- Persons living in mobile homes

Sea Level Rise

The Multi-Jurisdictional Hazard Mitigation Plan evaluated potential for sea level rise along the County's shorelines. Sea level rise can aggravate coastal cliff erosion, the process by which strong wave action and coastal flooding wear down or carry away rocks, soils, and/or sands along the coast. Sea level rise is projected to eliminate valuable coastal habitats damaging the state and county economy. Additionally, increased acidity in marine waters from carbon dioxide and upland runoff threatens aquaculture and the shellfish industry.

The USGS Coastal Vulnerability Index (CVI) for the Pacific Coast provides a preliminary overview at a national scale of the relative susceptibility of the United States coast to sea level rise. The classification is based upon geomorphology, regional coastal slope, tide range, wave height, relative sea-level rise, and shoreline erosion and accretion rates.

Figure 3.1.3-2 displays the USGS CVI map outlining Clallam County's estimated susceptibility to the sea level rise hazard. The CVI shows much of the western side of Clallam County as facing moderate and high vulnerability to sea level rise, however along the shoreline within Sequim's jurisdiction it is low to moderate.

Figure 3.1.3-2 USGS CVI Susceptibility to Sea Level Rise for Clallam County



Source: USGS, Coastal Change Hazards Portal, https://marine.usgs.gov/coastalchangehazardsportal/, accessed May 21, 2024.

GMA Requirements

Amended in 2023 by HB 1181, the GMA now requires integrating climate policies into comprehensive plan updates. The goal of HB 1181 is to ensure comprehensive plans:

- Adapt to and mitigate climate change;
- Reduce greenhouse gas (GHG) emissions and per capita vehicle miles traveled (VMT);
- Prepare for climate impact scenarios;
- Foster resilience to climate impacts and natural hazards;
- protect and enhance environmental, economic, and human health and safety, and advance environmental justice.

Washington State Department of Commerce led a multi-year project to develop model element guidance, which provides steps and pathways to integrate both a climate resilience and mitigation sub-element into a comprehensive plan, either as a set of integrated policies or a standalone element. For Sequim, these required policy changes address the Resilience Sub-Element requirements to consider climate impacts and increase resilience across local sectors. Sequim is not required to address requirements in the GHG Emissions Reduction Sub-Element. The Resilience Sub-element must include measures to mitigate natural hazards exacerbated by climate change and adapt to unavoidable impacts. Specifically, policies must:

- *Requirement 1*: Address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire, and other effects of changes to temperature and precipitation patterns.
- *Requirement 2*: Identify, protect, and enhance natural areas to foster climate resilience, as well as areas of vital habitat for safe species migration.
- *Requirement 3*: Identify, protect, and enhance community resilience to climate impacts, including social, economic, and built-environment factors, which support adaptation to climate impacts consistent with environmental justice.

HB 1181 also identifies that the Climate Element recognizes and promote as many co-benefits of climate resilience as possible, such as climate change mitigation, salmon recovery, forest health, ecosystem services, and socioeconomic health and resilience.

The Clallam County Multi-Jurisdictional Hazard Mitigation Plan was developed concurrently with these climate planning requirements and is intended to inform local comprehensive plans by integrating hazard mitigation, climate adaptation, infrastructure resilience, and equitable community planning. The City's 2025 Comprehensive Plan's Chapter 10 Climate and Resiliency build upon the Hazard Mitigation Plan by recognizing existing hazards, incorporating resilience into future land use and infrastructure planning, and supporting adaptation measures that reduce long-term risks associated with climate change.

3.1.3.2 Impacts

3.1.3.2.1 Impacts Common to Both Alternatives

Both the No Action Alternative and Proposed Action Alternative would accommodate continued population growth, housing development, commercial activity, and public infrastructure investment within the City of Sequim. As development occurs under either alternative, additional residents, structures, public facilities, transportation infrastructure, and utility systems would be exposed to existing natural hazards including earthquakes, severe weather, flooding, drought, wildfire smoke, extreme heat, and utility disruptions.

Development under either alternative would remain subject to federal, state, and local regulations intended to reduce risks associated with natural hazards. Existing development regulations require compliance with adopted building and fire codes, stormwater management standards, critical areas regulations, flood hazard regulations, and public infrastructure design standards. These regulations are intended to reduce vulnerability to flooding, seismic events, wildfire, and other hazards through site design, engineering standards, and construction requirements. As a result, future development would generally be more resilient to hazard events than older development constructed under previous standards.

Both alternatives would also rely on implementation of hazard mitigation and emergency preparedness efforts identified in the Clallam County Multi-Jurisdictional Hazard Mitigation Plan. These measures include improvements to transportation and utility infrastructure, emergency response planning, public education, stormwater management, wildfire preparedness, seismic resilience, and climate adaptation strategies. Continued coordination between the City, Clallam County, utility providers, emergency service agencies, tribal governments, and state agencies would help reduce risks associated with future hazard events.

3.1.3.2.2 Impacts of No Action and Action Alternatives

No Action Alternative

Impacts under the No Action Alternative would be similar to those described under Impacts Common to Both Alternatives. However, the No Action Alternative would retain the existing Comprehensive Plan, it would not incorporate the updated climate planning requirements adopted by the Washington State Legislature through House Bill 1181 or the expanded climate resilience policies included in the Proposed Action Alternative.

Action Alternative

Impacts under the Proposed Action Alternative would generally be similar to those described under Impacts Common to Both Alternatives. The Proposed Action Alternative includes the City's 2025 Comprehensive Plan update, which incorporates a new Climate and Resiliency chapter developed to comply with the climate planning requirements of House Bill 1181. The updated Comprehensive Plan integrates climate mitigation and adaptation throughout the planning framework by establishing goals and policies that promote resilient infrastructure,

emergency preparedness, reduction of greenhouse gas emissions, protection of critical environmental resources, and consideration of climate-related hazards in future land use, transportation, utilities, and capital facilities planning.

3.1.3.2.3 Summary of Impacts

Under both alternatives, continued growth and development would incrementally increase the number of people, structures, and public infrastructure exposed to existing natural hazards and the effects of climate change. The Proposed Action Alternative includes the Climate and Resiliency Chapter consistent with the requirements of HB 1181 to GMA.

Threshold	No Action Alternative	Proposed Action Alternative
Consistency with HB 1181	+	✕
Increase vulnerability to climate change related hazards	+	+

Table Key:
✕ No or Low Potential for Adverse Impact
+ Moderate Potential for Adverse Impact
+ High Potential for Adverse Impact

3.1.3.3 Mitigation Measures

Comprehensive Plan

Implementation of the Proposed Action would incorporate the goals and policies contained in the 2025 Comprehensive Plan Climate and Resiliency Chapter together with the implementation actions identified in the Clallam County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP). Together, these planning documents establish a coordinated framework for reducing vulnerability to climate change and natural hazards through land use planning, capital investments, emergency preparedness, environmental stewardship, and public education.

The 2025 Comprehensive Plan Chapter 10 Climate and Resiliency goals and policies address the following 11 topic areas:

- Water Resources
- Ecosystems
- Agriculture & Food Systems
- Buildings & Energy
- Economic Development
- Zoning & Development
- Emergency Management

- Health & Wellbeing
- Transportation
- Waste Management
- Cultural Resources & Practices

Sequim Specific Hazard Mitigation Measures

The City has identified a comprehensive series of mitigation objectives and supporting actions that are focused on reducing vulnerability and maximizing loss reduction from hazards. Mitigation actions prioritize various goals such as expanding capabilities (planning and regulatory, administrative, financial, education and awareness), infrastructure/capital improvement projects, natural systems and nature-based solutions, and socially vulnerable populations considerations.

Mitigation actions that accomplish these priorities in response to climate-related hazards are summarized below and are included in detail in the MJHMP Volume 2. Most of the identified mitigation actions address multiple objectives.

Table 3.1.3-2 City of Sequim Climate and Hazard Mitigation Actions

Mitigation Action Description	Hazards Addressed	Status
Capital Project Improvements		
Replace the 3-mile 12" water main from Ranney Well (infiltration gallery) beginning near the Dungeness River and ending at the Reservoir Road Reservoirs.	Floods, Utility Failure, Winter Storm,	Identified for future CIP
Purchase a portable water purification system and small tanks. Prepare multiple sites and equipment to operate the water purification.	Earthquake, flooding, tsunami	Identified for future CIP
Locate site for new potable water reservoir, purchase property, design and construct.	Winter storms, flooding	Identified for future CIP
Construct deep water well (>600 feet) to increase resiliency and reliability within the water system.	Utility Failure, Drought, Water Shortage	Current Project; 2nd well future CIP
Capture stormwater and re-infiltrate using green stormwater infrastructure to benefit the watershed.	Flooding, Drought, Wildfire	Partnership with Clallam County on Project Planning
Install an energy storage microgrid for storing solar energy and backup generators in critical City facilities.	All hazards	Funding application submitted in 2024 for Guy Cole
Protect/reinforce Johnson Creek Trestle for the Olympic Discovery Trail.	Earthquake, Flooding, Landslide, Winter Storm	Funding for Design secured in 2024
Construct capital improvements on West Sequim Bay Road, a critical evacuation route to Highway 101. Evaluate solutions for Pitship Bridge to protect the asset from flooding and storm surge.	Flood, Sea Level Rise	Preliminary Proposal Developed; Funding being pursued

Programmatic Activities		
Update risk assessments, including GIS analysis, for landslides, dam/reservoir failures, tsunamis, with substantial changes.	Landslides, Tsunamis, Dam/Reservoir Failure	Establish as GIS priority
Identify temperature-controlled storage needs for emergency supplies and a plan for procurement of both storage and supplies for essential government functions.	Disease, Active Shooter/Terrorism, All Hazards	Ongoing
Develop and maintain a Reliable Backup Program for Critical City Data Entry Post-Disaster	All hazards	In progress (2025)
Implement asset management using GIS for all capital facilities.	All hazards	In progress (2025)
Coordinate Emergency Management/Incident Response trainings for North Olympic Peninsula jurisdictions.	All hazards	In progress (2025)
Public education of potential hazards, local agency response, and preparedness.	All hazards	Ongoing
Develop risk assessment and response plan for vulnerable populations regarding excessive heat, cold, smoke inhalation – including loss of power and/or ability to transport.	All hazards	MJHMP and Mitigation Priorities
Participate in the County-wide Community Wildfire Protection Plan as a stakeholder. Utilize technical findings to understand areas of local vulnerability and relevant risk reduction strategies. Conduct wildfire risk assessment for the City of Sequim and Fire District 3.	Wildfire	In progress (2025)

Applicable Regulations

Washington State Climate Commitment Act (2021)

Washington State has established statewide targets to reduce emissions of GHG to 1990 levels by 2000 and to 95 percent below 1990 levels by 2050. The state has established benchmarks for reducing per capita vehicle miles traveled (VMT) by 50 percent from a baseline of 75 million by 2050, recognizing that the transportation sector is the largest contributor of GHG in the state. In 2021, the Washington State Climate Commitment Act was signed into law, which, among other things, establishes a "cap and invest" program. In 2021 the Clean Fuel Standard was also signed into law, requiring the carbon intensity of fuels to be reduced by 20% by 2038. The Washington State Legislature also provided direction related to EV infrastructure, including the adoption of building codes and development of tools for forecasting charging infrastructure needs. These actions in 2021 build upon previous state actions spurring the advancement of a zero-emission transportation system.

Washington State HB 1181 (2023)

Adds a climate change and resiliency element to the list of elements that must be included within the comprehensive plans. Requires jurisdictions to address the adverse impacts of climate change on people, property, and ecological systems, and identify actions the jurisdiction will take to reduce greenhouse gas emissions (GHG) and vehicle miles traveled (VMT) under the climate change and resiliency element of their comprehensive plan.

3.1.3.4 Significant Unavoidable Adverse Impacts

Under both alternatives, continued growth and development would incrementally increase the number of people, structures, and public infrastructure exposed to existing natural hazards and the effects of climate change. These impacts are an unavoidable consequence of accommodating planned urban growth under the GMA and the CPPs. Implementation of existing regulations, the Clallam County Multi-Jurisdictional Hazard Mitigation Plan, and under the Proposed Action Alternative, the 2025 Comprehensive Plan's Climate and Resiliency Chapter developed in compliance with House Bill 1181, would reduce long-term climate risks and improve community resilience.

3.2 Built Environment

3.2.1 Land Use

3.2.1.1 Affected Environment

Existing Land Use

The City of Sequim is approximately 6.37 square miles in area and is situated in the Dungeness Valley on the north Olympic Peninsula, set between the Olympic Mountains and the Strait of Juan de Fuca, approximately 17 miles east of Port Angeles and 31 miles west of Port Townsend. Sequim is primarily accessed by US Highway 101, which connects it to Port Angeles in the west and to Highway 20, US 104, and Port Townsend and the greater Puget Sound region to the east and south. The city is linked to the broader Olympic Peninsula with the Olympic Discovery Trail, a multi-use pathway that connects Port Townsend to La Push.

Sequim is the primary commercial and services hub for the largely rural surrounding region; there are no neighboring incorporated jurisdictions, although the unincorporated communities of Dungeness, Jamestown, Carlsborg, Port Williams, Washington Harbor, and Bell Hill surround the city

Current Land Use Patterns

The city is developed with residential neighborhoods supported by a variety of commercial uses. The City of Sequim urban core was developed at an urban density, with smaller residential lots and ready access to retail and services in town. The Existing Land Use Map (Figure 3.2.1-1) illustrates how land within the City of Sequim is currently developed and utilized. Existing land use patterns reflect the community's historic growth, development

trends, natural constraints, public facilities, transportation network, and adopted land use regulations.

Figure 3.2.1-1 City of Sequim Existing Land Use Map

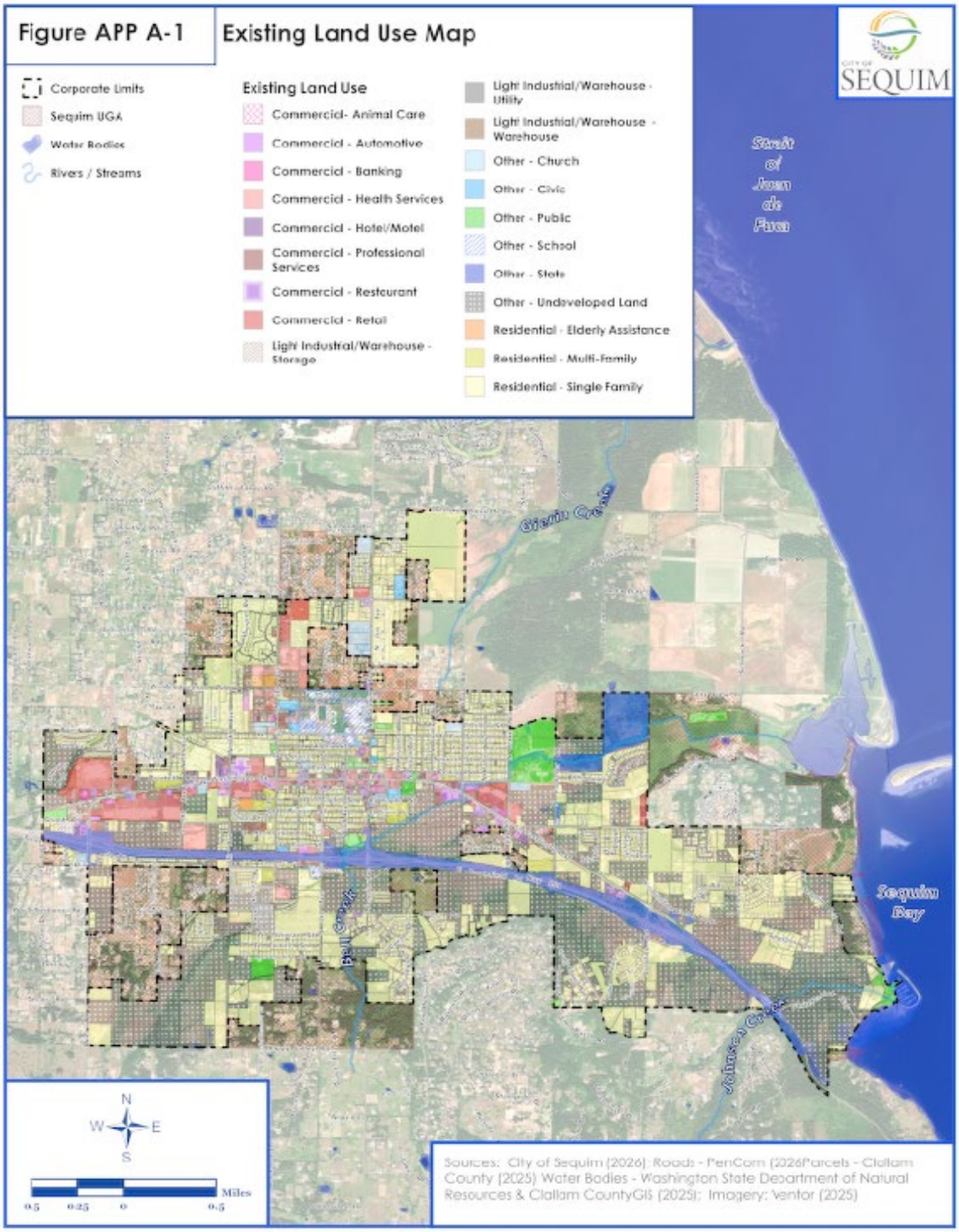


Table 3.2.1-1 Existing Land Use Inventory		
Land Use Classification	**Acres**	**Percent of total**
Residential		
Single-family	1452.93	40.91%
Multi-family	29.12	0.82%
Elderly assistance	10.85	0.31%
Commercial		
Animal care	2.75	0.08%
Automotive	15.88	0.45%
Banking	8.28	0.23%
Health services	48.49	1.37%
Hotel/motel	11.97	0.34%
Professional services	47.24	1.33%
Restaurant	25.97	0.73%
Retail	158.04	4.45%
Light Industrial/Warehouse		
Storage	17.15	0.48%
Utility	4.61	0.13%
Warehouse	4.36	0.12%
Other		
Public	103.64	2.92%
Civic	4.81	0.14%
Church	38.53	1.08%
School	69.63	1.96%
State	201.8	5.68%
Undeveloped Land	1295.77	36.48%
Total	**3551.82**	**100.00%**

Current Land Use Designations and Zoning

Current future land use designations and zoning districts generally match the existing uses. Land Use designations are implemented through zoning classifications and development regulations. The land use designations and corresponding implementing zones are summarized below:

Table 3.2.1-2 2015 Future Land Use Designations and Zoning

Land Use	Description	Implementing Zone	Acreage by LU	Percent of Total
Low Density Residential	Residential district allowing single-family homes. Limited allowance for public facilities and services, special needs housing, and multifamily (up to four units).	R4-8	2359.28	66.4%
Lifestyle District	Mixed-use district allowing all housing types, neighborhood-scale retail, healthcare offices and facilities, assisted living, and public services and facilities.	Lifestyle District	267.1	7.5%
Neighborhood Business	Mixed-use district allowing neighborhood-scale retail and services, multifamily housing in a mixed-use project, and public facilities.	Neighborhood Business	7.5	.2%
Community Mixed Use	Mixed-use district allowing community retail and services, public facilities, and housing in mixed-use projects. Affordable housing is allowed as a stand-alone project.	Community Mixed Use	129.25	3.6%
Regional Commercial	Commercial district allowing regional retail and services.	Regional Commercial	112.16	3.1%
Highway Commercial	Commercial district allowing visitor and tourist-oriented retail, services, and lodging.	Highway Commercial	24.45	.6%
Heavy Commercial/Warehouse	Commercial/light industrial district allowing contractor yards, wholesale, warehouses,	Heavy Commercial/Warehouse	30.26	.8%

Land Use	Description	Implementing Zone	Acreage by LU	Percent of Total
	and light product assembly and finishing.			
High Tech Light Industrial	Light industrial district allowing high tech and emergent tech projects including research, design, manufacturing, and assembly of high-value products.	High Tech Light Industrial	45.18	1.2%
Economic Opportunity Area	Commercial/light industrial district allowing a range of high-tech light industrial, institutional, regional retail, and mixed-use projects.	Economic Opportunity Area	136.16	3.8%
Downtown Districts	Commercial district allowing a full range of community-serving uses, with limited exceptions. Implements the 2011 Downtown Plan.	Downtown Core, Downtown Mixed Use-1 and Downtown Mixed Use-2	144.11	4.1%
Planned Resort Community	Mixed-use district allowing a range of residential, local retail and services, and tourism uses when developed under a master plan.	Planned Resort Community	160.25	4.5%
Agricultural Conservancy	Agricultural district allowing low-intensity agriculture and open space uses.	Agricultural Conservancy	40.39	1.1%
Neighborhood Park Park/Open Space/Schools	Parks, Open Space and Schools.	R4-8	95.2	2.7
		Total	**3551.29**	**100%**

Figure 3.2.1-2 2015-2035 Sequim Future Land Use Map

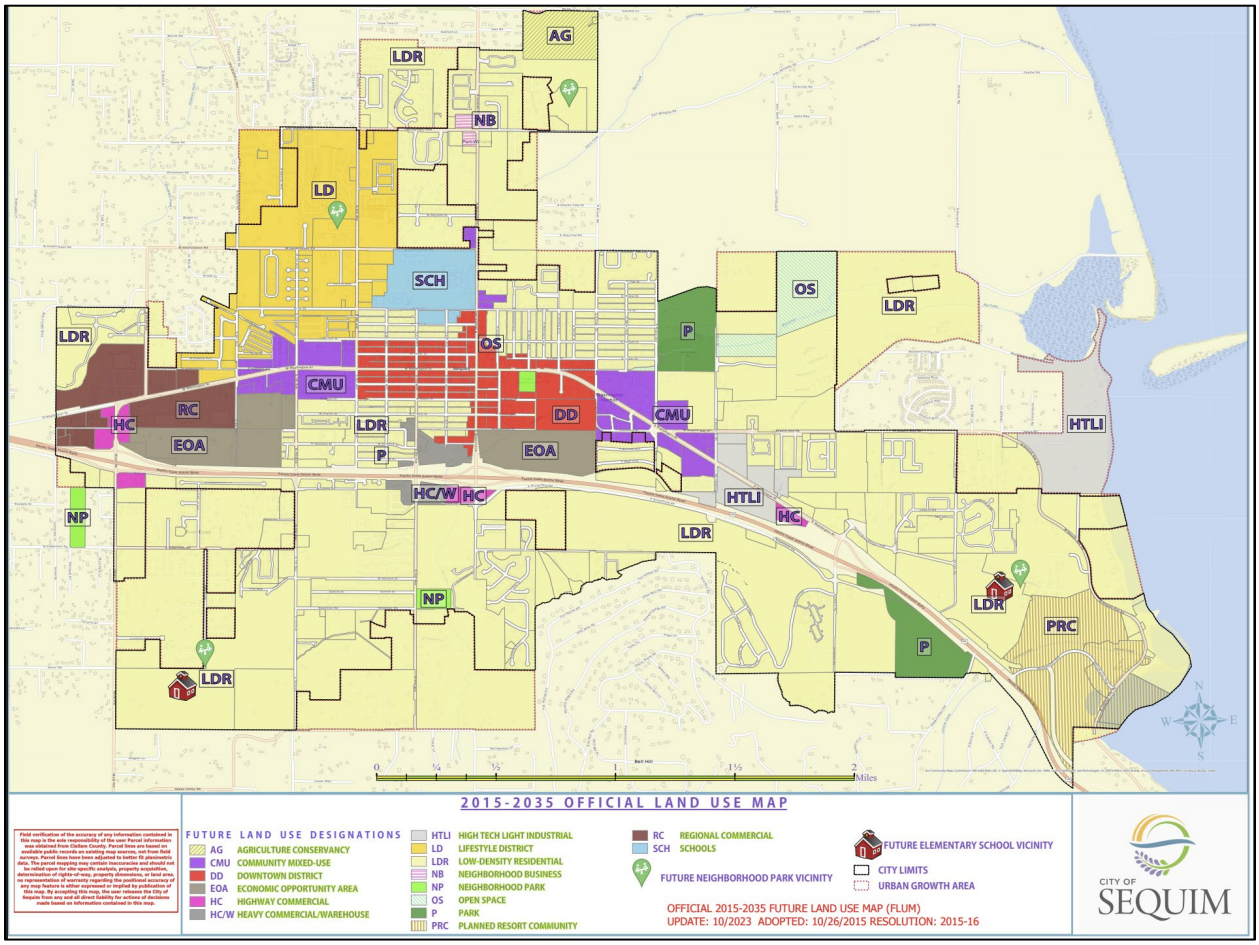
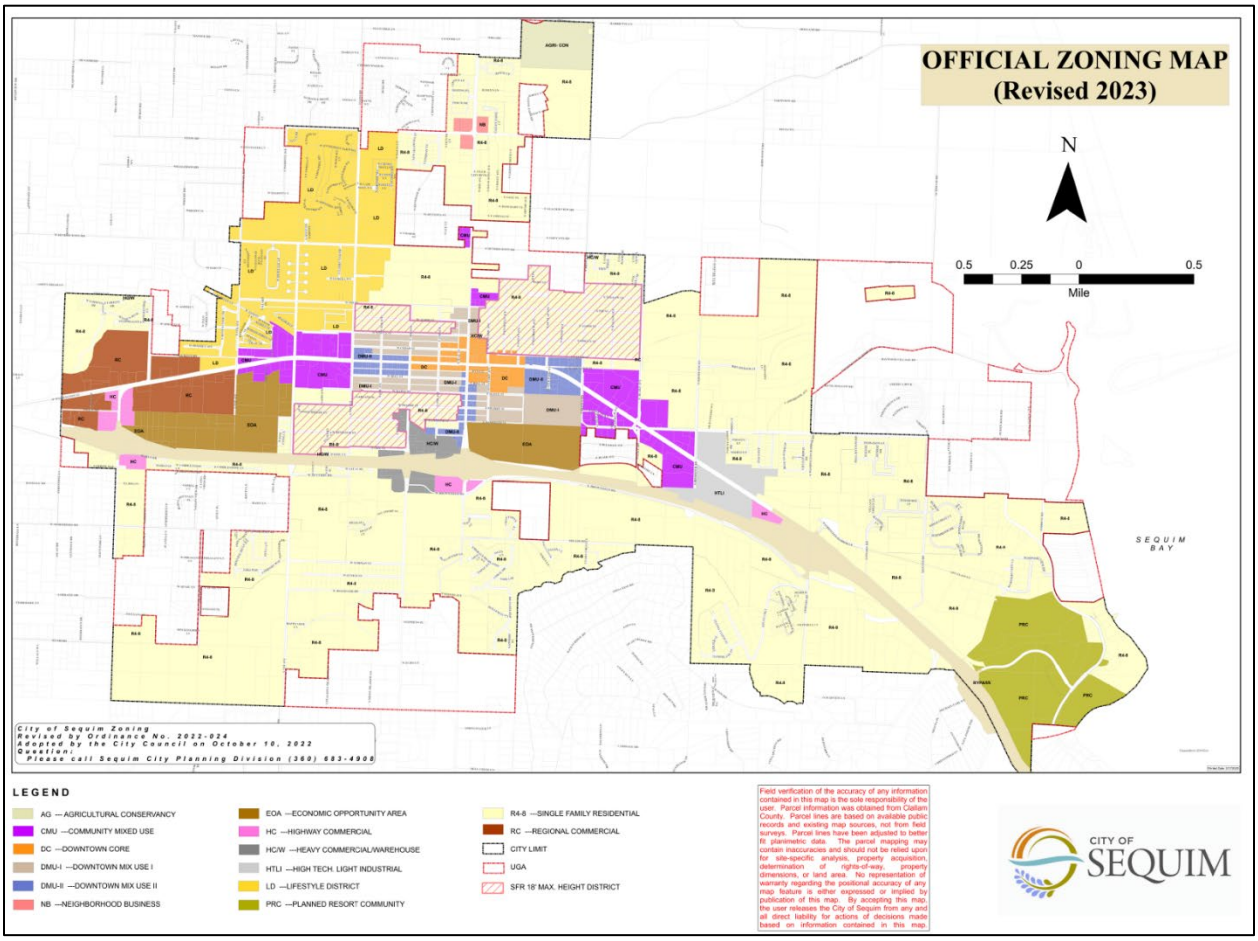


Figure 3.2.1-3 Sequim Current Zoning Map



Proposed Land Use Designations and Zoning

The Proposed Action would adopt a new future land use map that is substantially similar to the 2015 Future Land Use map with several revisions to land use designations described below.

Table 3.2.1-3 2025-2045 Future Land Use Designations and Zoning

Land Use	Description	Implementing Zone	Acreage by LU	Percent of Total
Low Density Residential	Supports detached single-family homes, small-scale attached housing (such as multiplexes and townhomes), accessory dwelling units, and cottages.	R 4-9	2069.48	58.7%
Lifestyle District	Encourages development of diverse, mixed-use neighborhoods that offer a variety of housing types, services, and amenities designed to support livability and meet the evolving needs of residents of all ages.	Lifestyle District	269.1	7.6%
Neighborhood Business	Allows retail sales and services routinely needed by neighborhood residents in locations that are convenient to nearby neighborhoods and offers the potential to grow as mixed-use neighborhood centers.	Neighborhood Business	7.57	0.2%
Community Mixed Use	Provides residents with centralized access to retail businesses and services that meet community-wide needs, create a complementary mix of community-serving retail, personal and professional services, public facilities, transient lodging, and multifamily-attached housing types.	Community Mixed Use	149.89	4.3%

Land Use	Description	Implementing Zone	Acreage by LU	Percent of Total
Regional Commercial	Allows retail and service uses, primarily "big box" stores and national retailers that serve the regional market that includes the entire North Olympic Peninsula. Provides local and regional residents with convenient access at a highway interchange to major retailers.	Regional Commercial	103.11	2.9%
Highway Commercial	Meets the needs of tourists and other visitors by providing a range of uses at the primary access to the city at US 101 interchanges, while also offering services and conveniences that serve the needs of residents.	Highway Commercial	33.44	0.9%
Heavy Commercial/Warehouse	Provides locations for heavy commercial and warehouse uses that accommodate needed business activities with a sensitivity to compatibility with adjacent uses.	Heavy Commercial/Warehouse	12.01	0.3%
High Tech Light Industrial	Provides appropriate locations for uses such as office, light industrial, light manufacturing/assembly, clean energy, science and technology research and development, food and beverage production with tasting room and other similar uses.	High Tech Light Industrial	26.96	0.8%
Opportunity Area	Provides a mix of residential, services, and employment where combining uses vertically or horizontally increases the community's residential, economic base and job opportunities.	Opportunity Area	136.16	3.9%

Land Use	Description	Implementing Zone	Acreage by LU	Percent of Total
Downtown Districts	Serves as the city's civic and cultural hub, blending retail, residential, and public spaces to foster a vibrant, walkable downtown core. Encourages a mix of work, living, and recreation within the heart of the city.	Downtown Core and Downtown Mixed Use (DMU)	144.11	4.1%
Planned Resort Community	Enable the realization of a planned resort community that includes a mix of year-round and seasonal residences, tourist accommodations, and commercial and other uses to serve them, utilizing a master planning process.	Planned Resort Community	160.25	4.5%
Agricultural Conservancy	Maintain agricultural use for the benefits of an urban community for food production or on any parcel that is preserved in perpetuity or easement to maintain agricultural use.	Agricultural Conservancy	40.39	1.1%
Public	Acknowledging existing government buildings, schools, public safety, and other public uses essential for community services and civic functions.	Public	319.25	9.1%
Open Space	Open spaces under state agency ownership and intended to be long-term protected open space.	Open Space	65.68	1.9%
		Total	**3537.40**	**100%**

**Note: Difference in total acreage between Tables 3.2.1-1, 2 and 3 is due to inclusion of right of ways that vary between spatial layers informing the three tables.*

Summary of changes proposed in the Action Alternative Future Land Use Map, land designations, zoning map:

- Low Density Residential/R4-9 - increase in one unit per acre to align with minor subdivision standards and apply consistent 2-story height limit throughout district.
- Lifestyle District – no changes proposed.
- Neighborhood Business – additional travel service uses.
- Community Mixed Use – no changes proposed.
- Regional Commercial – no changes proposed.
- Highway Commercial – additional uses consistent with other commercial districts.
- Heavy Commercial/Warehouse – no changes proposed.
- High Tech Light Industrial – additional uses for food and beverage production, tasting rooms, and similar uses.
- Opportunity Areas – eliminate 'economic' from designation name, include locational name (i.e. Bell Creek or River Road), and allow for increased range of uses, including mixed use and residential.
- Downtown Districts – consolidation to two districts (from three) Downtown Core and Downtown Mixed Use (DMU).
- Planned Resort Community – adds district specific standards.
- Agricultural Conservancy – no changes proposed.
- Public - Consolidation of Park, Neighborhood Park and Schools designations with other public uses, into a Public land use and zoning district.
- Open Space – separate from parks, acknowledges state-owned land.

The proposed changes outlined above were informed by early public engagement process, input from Planning Commission and City Council, and technical analysis and recommendations for the 2025 Comprehensive Plan, such as the 2025 Housing and Economic Market Analysis, Adequate Provisions Analysis, and Racially Disparate Impacts Analysis, all prepared by Leland Consulting Group.

In addition, there are limited site-specific parcels redesignation/rezoning, as outlined in Section 2.3.2 above, and summarized below:

- Redesignating three properties on the south side of Highway 101 at the River Road interchange from Highway Commercial to Low Density Residential, consistent with the adjacent existing land uses.
- Redesignation of six parcels from existing land use designations Community Mixed Use, allowing a broader range of uses consistent with the adjacent land uses.
- Redesignating three properties along E Washington from High Tech Light Industrial to Community Mixed Use (two properties) and Highway Commercial (one property) consistent with adjacent designations and existing land uses.
- Redesignate property owned by City of Sequim and Clallam County PUD from Heavy Commercial/Warehouse to Public.

- Pre-designation of five Urban Growth Area properties from Low Density Residential to Regional Commercial, to ensure adequate supply of commercial land, consistent with nearby land uses; becomes effective only upon property-owner-initiated annexation.

Figure 3.2.1-4 Proposed 2025-2045 Future Land Use Map

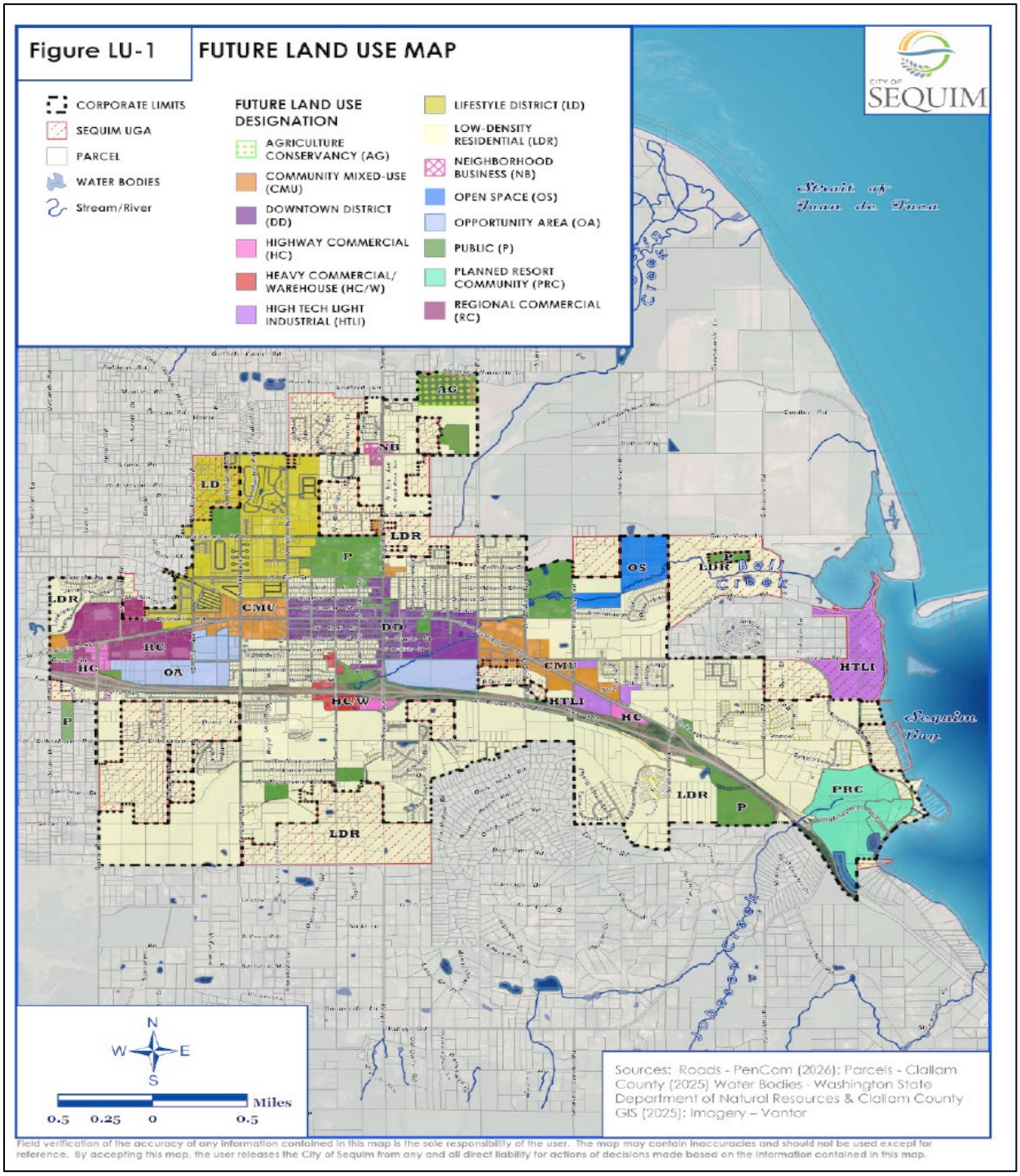
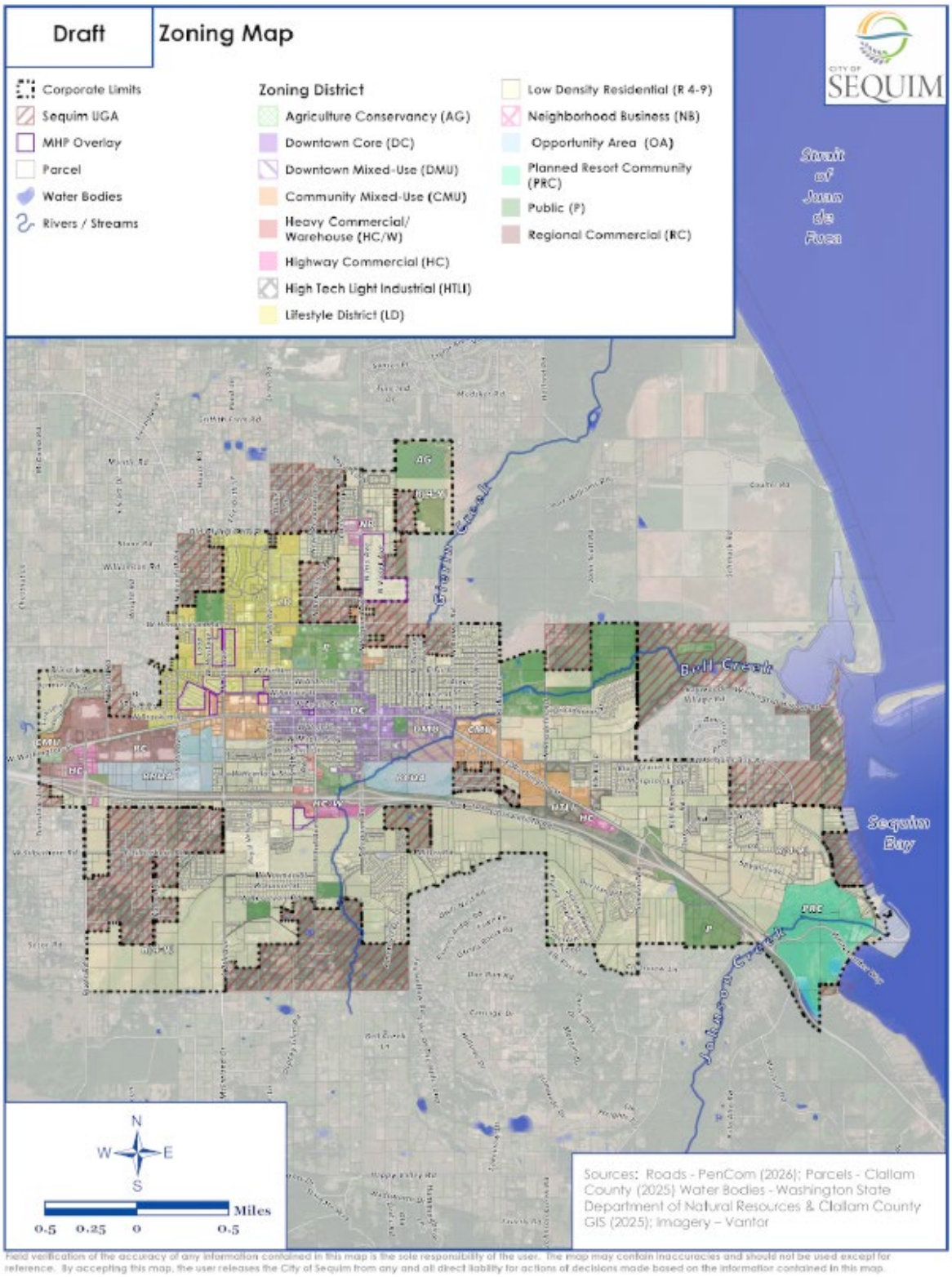


Figure 3.2.1-5 Proposed Zoning Map



Field verification of the accuracy of any information contained in this map is the sole responsibility of the user. The map may contain inaccuracies and should not be used except for reference. By accepting this map, the user releases the City of Sequim from any and all direct liability for actions of decisions made based on the information contained in this map.

Land Capacity Analysis

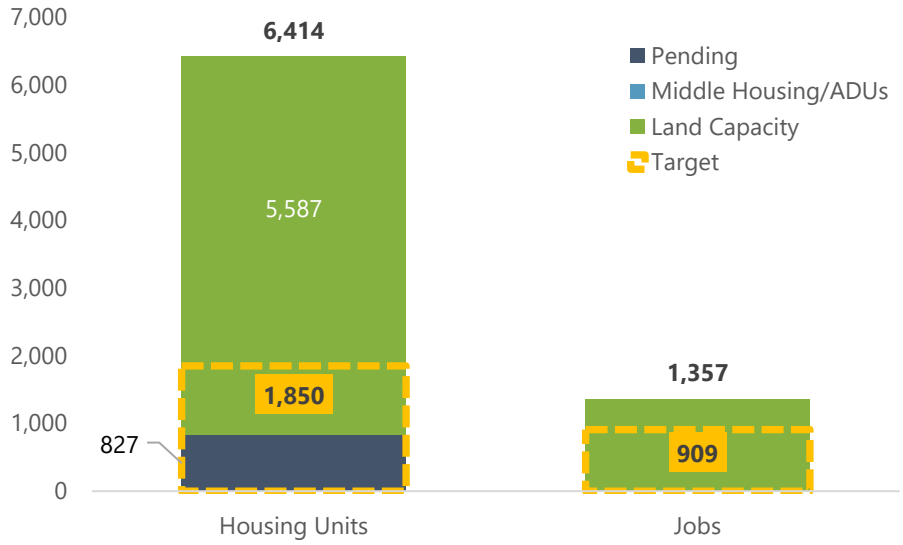
The GMA requires that each jurisdiction have enough developable land to accommodate the 20-year projected population growth. The City of Sequim retained Leland Consulting Group to conduct an extensive land capacity analysis as part of the 2025 Comprehensive Plan Update and is included as Appendix A-3.

In accordance with GMA, the 2025 Update addresses 2045 horizon year, and considers new population, housing and job targets, changes to the future Land Use map, a fair share of affordable housing, housing policy amendments to address racially disparate impacts, and supporting investments in parks and multimodal/active transportation, utilities, and public services. The GMA growth allocation assigned to Sequim by Clallam County is:

- 2,959 additional residents;
- 1,850 additional housing units; and
- 909 additional jobs.

Figure 3.2.1-6 below shows the overall results of the housing and jobs capacity analysis. Units that have been developed since the 2020 baseline or are permitted/pending final land use decision but not yet built are indicated in dark blue. The capacity for housing and jobs is displayed in green. Sequim's total housing capacity is 5,587 units and the employment capacity is 1,357 jobs. The targets set by the County are highlighted in dashed yellow boxes. Overall, Sequim has sufficient capacity to accommodate its housing and job allocation. (Note: by meeting the housing growth allocation, the population growth is also met, as persons by household is a component of calculating housing capacity.)

Figure 3.2.1-6 Sequim Land Capacity Analysis Results for Total Housing Units and Jobs, 2020-2045



3.2.1.2 Impacts

3.2.1.2.1 Impacts Common to Both Alternatives

Development will continue in Sequim under either alternative, expanding housing supply and employment opportunities as vacant or underutilized parcels are developed or redeveloped, and resulting in increased development intensity over time. In both the No Action and the Proposed Action Alternatives, growth will follow a similar future land use plan that continues the preexisting pattern of residential uses surrounding mix of commercial uses, with some options for mixed uses in certain areas. Residential land uses in both alternatives continue to emphasize single-unit detached housing (single family residential) with a range of typologies for multifamily options available. Based upon the available vacant and undeveloped land within the city limits identified through the Land Capacity Analysis, both alternatives have sufficient capacity for both housing units and employment uses.

Both alternatives encourage urban growth and development in urbanized areas, and there are no changes proposed to the extent or location of Sequim's UGA under either alternative. This encourages development where adequate public facilities and services exist or can be provided efficiently and reduces urban sprawl. General impacts associated with growth include the following: conversion of undeveloped land for new residential, commercial, public and/or industrial uses; increased intensity of use, bulk and scale on developed parcels through redevelopment or infill development on underutilized parcels; and land use compatibility issues resulting from the encroachment of denser development patterns on current uses often less dense.

In both Alternatives, changes in urban form and development intensity are expected to occur over time. Under either alternative, properties can continue to develop or redevelop consistent with adopted zoning and development regulations. Under the No Action alternative, the urban form and character of development would be consistent with recent development trends. Under the Proposed Action alternative, development would be substantially consistent with recent development trends because similar siting, massing, and design requirements will continue to apply to new projects. Regulatory changes in Title 18 SMC could encourage more residential development by allowing great variety of housing types, such as mixed-use options and middle housing unit typology. In addition, new regulatory changes also are included to ensure compatibility of new development with the immediate vicinity.

Consistency with GMA

The No Action Alternative is less consistent with goals and policies related to housing choice and affordability. The Proposed Action Alternative was developed to comply with changes in the GMA, identified in Table 2.2-1; the most substantive are summarized below:

- HB 1220 (2021) requiring Housing Elements to include an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth including units for moderate, low, very low, and extremely low income households. This includes planning for emergency and permanent supportive housing. Analyzing racially disparate impacts and addressing equity is also required.
- HB 1337 (2023) requiring jurisdictions to increase the flexibility of their accessory dwelling unit codes.
- HB 1043 (2023) requiring provisions to promote the conversion of existing commercial and mixed-use buildings to multi-family.
- SB 6025 (2024) limiting regulations on certain parking standards and provides standards to utilize.
- HB 2266 (2026) allow transitional housing, permanent supportive housing, indoor emergency shelters, and indoor emergency housing (STEP) in any zoning district that are not zoned for industrial uses.

Prior to 2021, jurisdictions were required to plan for coordinated growth by ensuring adequate land capacity for specific housing and employment allocations. After adoption of HB 1220, jurisdictions are still required to plan for housing and employment allocations, but housing allocations are broken down into housing affordable to all income levels, including emergency shelters, transitional housing, emergency housing, and permanent supportive housing (STEP housing). Land capacity must consider the housing affordability breakdown; Housing Section evaluates in greater detail. The Proposed Action Alternative includes updated policies and development regulations to meet targets for each housing affordability band, as well as the other various development regulation standards now required by GMA.

3.2.1.2.2 Impacts of No Action and Action Alternatives

No Action Alternative

In the No Action Alternative, Sequim would continue to develop per the 2015 Comprehensive Plan, Future Land Use Map, and current zoning regulations. This alternative maintains the current planned land use patterns and development intensities. Unbuildable lands, such as critical areas and their buffers, public rights-of-way, and public-owned properties are not assumed to develop. Critical areas would be adequately protected from development.

Under the No Action Alternative, the City of Sequim has adequate land use for its housing and jobs growth allocations. The No Action Alternative does not meet the numerous GMA requirements (Table 2.2-1) for land use and development standards that were adopted after 2015. By not addressing these amendments to the GMA, the No Action Alternative does not meet requirements the Growth Management Act.

Action Alternative

The Proposed Action is designed to provide capacity for housing and employment growth consistent with GMA requirements and Clallam County CPPs, including planning for growth allocations by housing affordability band. The proposed future land use plan is very similar to the No Action Alternative and will generally maintain similar land use patterns and development intensities. The Proposed Action Alternative provides slightly improved flexibility in land uses and development densities, as described above. The Proposed Action would extend the Comprehensive Plan planning period to maintain a 20-year planning horizon (to 2045), consistent with GMA requirements. The plan would be reviewed again in 10 years, consistent with the recently modified GMA periodic review cycle, and an implementation progress report would be prepared in five years' time.

The proposed changes to land use and zoning would simplify the application and administration of the zoning code. Future development under the Proposed Alternative could result in new land uses located adjacent to or near existing land uses, similar to growth under the No Action Alternative. New development under the Proposed Action has the potential to create compatibility issues with existing lower density uses as the city grows. Land use and zoning changes are intended to ensure future development is compatible with existing land uses, and regulatory standards for siting, building mass and scale, landscaping and architectural design, parking, and other development standards are updated under this Alternative, and apply to new development to ensure compatibility.

3.2.1.2.3 Summary of Impacts

Changes to land use designations and zoning regulations under the Proposed Action Alternative would allow Sequim to comply with recent legislative changes to the GMA. Under the No Action Alternative, Sequim's current Comprehensive Plan and Development Regulations would not meet requirements of the amendments to GMA summarized in Table 2.2-1.

Threshold	No Action Alternative	Proposed Action Alternative
Meets GMA Requirements for Land Use Elements	+	✕
Provides Adequate Land Capacity for Growth Allocations	✕	✕
Addresses Land Designations/Districts for Housing Affordability Bands	+	✕

Table Key:

✕ No or Low Potential for Adverse Impact

\+ Moderate Potential for Adverse Impact

\+ High Potential for Adverse Impact

3.2.1.3 Mitigation Measures

Comprehensive Plan

The Action Alternative 2025 Comprehensive Plan Land Use and Housing Chapters, Appendix A includes numerous goals and policies and required analysis that meet the legislative amendments to GMA and the periodic update requirements. The Action Alternative update to SMC Title 18 Zoning includes numerous new and updated development standards that respond to and meet the legislative mandates of GMA and ensure adequate land capacity for housing affordability bands as required.

Proposed Future Land Use and Zoning Maps

The proposed Future Land Use and Zoning Maps includes several updates from the 2015 Future Land Use Map. The following section summarizes the primary changes and their purpose.

- Low Density Residential/R4-9 – code increases in one unit per acre to align with minor subdivision standards.
- Lifestyle District – no changes proposed.
- Neighborhood Business – code adds additional travel service uses.
- Community Mixed Use – no changes proposed.
- Regional Commercial – no changes proposed.
- Highway Commercial – code adds additional uses consistent with other commercial districts.
- Heavy Commercial/Warehouse – no changes proposed.
- High Tech Light Industrial – code adds additional uses for food and beverage production, tasting rooms, and similar uses.
- Opportunity Areas – eliminate 'economic' from designation name, include locational name (i.e. Bell Creek or River Road), and code allows for increased range of uses, including mixed use and residential.
- Downtown Districts – consolidation to two districts (from three) Downtown Core and Downtown Mixed Use (DMU).
- Planned Resort Community – code adds district specific standards.
- Agricultural Conservancy – no changes proposed.
- Public - Consolidation of Park, Neighborhood Park and Schools designations with other public uses, into a Public land use and zoning district.
- Open Space – separate from parks, acknowledges state-owned land.

Proposed Title 18 Regulations

Updates to Title 18 largely focus on improving clarity of required standards, including updating definitions, using consistent terminology, and providing guidance on measurement

methodologies. The following is a highlight summary. The Appendix to the SDEIS provides a detailed matrix of Title 18 updates.

- Standardized land use definitions, use classifications, and tables to provide clearer and more predictable development standards.
- Conversion of discretionary or narrative standards into objective, measurable development regulations.
- Revised residential zoning standards, including an increase in the R4-8 district to R4-9, updated density calculations, lot standards, setbacks, and lot coverage requirements.
- Expanded housing opportunities through implementation of state-required housing legislation, including updated standards for accessory dwelling units (ADUs), supportive and transitional housing, affordable housing, co-living, and transitory accommodations.
- New Affordable Housing Exceptions chapter establishing development incentives for qualifying low-income affordable housing projects.
- Creation of a new Site Plan Review chapter to provide a consistent review process for most development projects.
- Updated commercial, mixed-use, downtown, business/employment, and planned resort districts' bulk, dimensional, and height standards.
- Planned Residential Development (PRD) standards to improve predictability and creativity in project design.
- New cluster housing standards to support diverse housing types and more efficient residential development.
- Updated landscaping, buffering, and open space standards emphasizing drought-tolerant and native vegetation while simplifying maintenance requirements.
- Modernized off-street parking standards, including reduced parking requirements for housing where required by state law and consolidation of electric vehicle infrastructure standards.
- Improved procedures for Master Plans, Conditional Use Permits, Temporary Use Permits, Design Review, and Essential Public Facilities to provide greater certainty and clearer decision-making authority.
- Consolidation of related regulations and elimination of redundant provisions to improve usability and reduce administrative complexity.
- Numerous formatting, organizational, and procedural improvements that make the development regulations easier to interpret, administer, and enforce.

<u>Other Potential Mitigations</u>

Impacts from growth and development are typically mitigated through adherence to adopted development regulations. For certain projects, additional mitigation measures may be applied through project-specific land use and environmental (SEPA) review. The following are potential mitigations that could be identified on a project-by-project basis.

- Building and site design elements for new commercial and mixed-use developments.
- Incorporation of larger redevelopment areas and new developments to provide squares, plazas, seating areas, and other public gathering spaces.
- Utilized timed interior and exterior lighting for commercial, public and industrial uses.
- Limit use of reflective materials and encourage use of low reflectance glass and other materials.
- Use of SEPA authority for aesthetics for impacts on site-specific development projects if needed for additional mitigation.

3.2.1.4 Significant Unavoidable Adverse Impacts

Under both alternatives, additional growth would occur across the city and gradual conversion of low-intensity uses to higher-intensity development patterns. This transition would be unavoidable, but it is not significant and adverse since this is an expected characteristic of the City's obligation under the Growth Management Act and helps fulfill Countywide Planning Policies. The combination of existing and new development regulations, zoning requirements, site and design standards in the Action Alternative would result in no significant unavoidable adverse impacts are anticipated.

3.2.2 Plans and Policies

3.2.2.1 Affected Environment

This section describes pertinent plans, policies, and regulations that guide or inform the proposal. Plans and policies evaluated in this section include the Growth Management Act (GMA) and the Clallam County Countywide Planning Policies (CPPs). Each of these policy documents establish a regulatory or policy framework with which comprehensive plans must be consistent.

According to WAC 365-196-210(8), consistency means "that no feature of a plan or regulation is incompatible with any other feature of a plan or regulation. Consistency is indicative of a capacity for orderly integration or operation with other elements in a system." For the purposes of this analysis, consistency means that the alternative can occur and be implemented together with the selected goal or policy without contradiction. In this section, a finding of inconsistency or contradiction with plans and policies would be considered to result in a significant adverse impact.

Growth Management Act

The Washington State GMA was adopted in 1990 in response to concerns over uncoordinated growth and its impacts on communities and the environment. The GMA contains a comprehensive framework for managing growth and coordinating land use with infrastructure. Provisions of the GMA apply to the state's largest and fastest growing jurisdictions.

The GMA contains broad planning goals (RCW 36.70A.020) to guide local jurisdictions in determining their vision for the future and in developing plans, regulations, programs, and budgets to implement that vision. The GMA goals are presented in Section 2.2.1 above.

Sequim is now preparing an update to its comprehensive plan. The plan will refine and implement the community vision, values and objectives, and update each element of the comprehensive plan. The Sequim 2025-2045 plan will address future growth and development consistent with GMA.

Plan Consistency

A central concept of GMA is the requirement that comprehensive plans be internally and externally consistent. Internal consistency means that the "differing parts of the comprehensive plan must fit together so that no one feature precludes the achievement of any other" (WAC 365-196-500(1)). In a practical sense, internal consistency also means using compatible assumptions, such as consistent numeric assumptions in land use, capital facilities, and other elements of the comprehensive plan. Further, if relying on forecasts, data, or functional plans developed by other entities, a county or city should identify differences and reconcile them to have compatible assumptions. Finally, each plan must have a mechanism for ongoing review and plan adjustment, as well as required review cycles in the GMA (RCW 36.70A.130), generally every ten years.

Each county or city that is preparing a GMA comprehensive plan or implementing development regulations, or amendments to them, is required to submit the proposed plan or regulations to the Washington State Department of Commerce and other state departments for review and comment before final adoption.

Public Participation

A fundamental requirement of the GMA is early and continuous public participation in the development and amendment of plans and development regulations. Public participation procedures that are described in the procedural rules (WAC 365-196-600) include broad dissemination of proposals and alternatives, opportunity for written comment, public meetings after effective notice, provision for open discussion, communication programs, information services, and consideration of and response to public comments. The City prepared a public participation plan for the 2025 periodic update effort.

State Environmental Policy Act (SEPA)

SEPA (RCW 43.21C) requires government officials to analyze the environmental consequences of actions they are considering and examine better or less damaging ways to accomplish those proposed actions. They must determine whether the proposed action would have a probable significant adverse environmental impact on the natural and built environment. This DSEIS provides qualitative and quantitative analysis of environmental impacts as appropriate to the general nature of the Comprehensive Plan Update proposal.

Clallam Countywide Planning Policies (CPPS)

The GMA requires counties and cities to collaboratively develop CPPs to set the general framework for coordinated land use and population planning between a county and its cities to ensure comprehensive plans are consistent with each other (RCW 36.70A.210). All comprehensive plans prepared by Clallam County and its cities and towns are to be consistent with CPPs per GMA. The Clallam County CPPs were last updated in 2018 and cover the following topics:

- Urban Growth Areas
- Joint Planning and Contiguous and Orderly Development
- Siting of Public Capital Facilities
- Transportation Facilities and Strategies
- Affordable Housing
- Economic Development and Employment
- Fiscal Impact Analysis of Urban Growth Areas
- Open Space Corridors Within and Between Urban Growth Areas
- Environment
- Rural Land Uses and Development Patterns

3.2.2.2 Impacts

3.2.2.2.1 Impacts Under Both Alternatives

This section evaluates the alternatives for consistency with adopted state, countywide, and local plans and policies that guide growth and development. An impact would occur if an alternative would result in a substantial inconsistency with an adopted plan or policy.

Both alternatives are generally consistent with the Growth Management Act (GMA) planning goals, including directing growth to urban areas where public facilities and services are available or can be provided efficiently. Neither alternative proposes changes to the location or extent of the City's Urban Growth Area (UGA), thereby continuing to support coordinated urban development and limiting urban sprawl.

The No Action Alternative, however, would be less consistent with recent amendments to the GMA because it would retain the 2015 Comprehensive Plan and development regulations, which do not fully address housing, climate, and transportation requirements adopted by the Washington State Legislature since 2015. The Proposed Action Alternative incorporates these legislative changes, including but not limited to:

- HB 1220 (2021): Requires Housing Elements to identify existing and projected housing needs across all income levels, including emergency housing, emergency shelters, transitional housing, and permanent supportive housing, while evaluating racially disparate impacts and advancing equitable housing opportunities.
- HB 1337 (2023): Requires jurisdictions to increase flexibility for accessory dwelling units (ADUs).

- HB 1181 (2023): Requires adoption of a Climate and Resiliency Element addressing climate adaptation, natural hazards, environmental justice, and multi-modal transportation level of service standards.

The Proposed Action Alternative updates the Comprehensive Plan and development regulations to implement these legislative requirements. Consistent with HB 1220, the City's Housing Element plans for housing needs across all affordability levels, and the 2025 Land Capacity Analysis (Appendix A-3) demonstrates that sufficient land capacity exists to accommodate both the City's population growth allocation and its housing needs by affordability level. The Proposed Action Alternative also establishes new policies addressing climate resilience, greenhouse gas reduction, and multimodal transportation planning.

Overall, both alternatives remain generally consistent with the intent of the GMA planning goals; however, the Proposed Action Alternative provides greater consistency with current state law by incorporating legislative changes adopted since the City's 2015 Comprehensive Plan.

GMA Goal	No Action	Proposed Action	Discussion
1. Urban Growth	✓	⊕	Both alternatives focus growth in urban areas. The Proposed Action Alternative introduces a greater range of flexibility in uses and simplifies the administration of the Comprehensive Plan to facilitate streamlined development.
2. Reduce Sprawl	✓	✓	Both alternatives focus growth in urban areas, and both alternatives have adequate capacity for allocated population, housing units, and jobs through 2045.
3. Transportation	⊖	✓	Both alternatives increase the demand for and provision of multimodal transportation. The Action Alternative responds to new GMA requirement for policies and programs promoting active/non-motorized transportation modes.
4. Housing	⊖	⊕	The Proposed Action includes an updated Housing Element that meets current state laws for affordable housing capacity and removing barriers to housing. The No Action Alternative does not meet affordable housing requirements.
5. Economic Development	✓	✓	Both alternatives demonstrate adequate capacity for job growth in a variety of sectors.
6. Property Rights	✓	✓	Both alternatives provide for a reasonable use of properties, including a variety of residential, commercial, industrial, and institutional uses.
7. Permits	✓	⊕	Both alternatives include policies and codes to review development applications and permits. The Proposed Action includes amendments to Title 18 SMC to clarify and simplify procedural requirements, removing barriers to development and streamlining the permitting process.
8. Natural Resource Industries	✓	✓	Both alternatives focus growth in urban areas, allowing rural and resource lands to be protected for rural and resource uses.

9. Open Space and Recreation	✓	✓	Both alternatives plan for parks, recreation, and open space and adopt critical areas regulations to protect environmentally sensitive areas.
10. Environment	✓	✓	Both alternatives provide regulatory protections for critical areas.
11. Citizen Participation and Coordination	✓	+	The No Action Alternative included community engagement and visioning processes. The Proposed Action Alternative used more recent community engagement and public participation processes to inform recommendations.
12. Public Facilities and Services	✓	+	Both alternatives will increase demand for public facilities and services through growth and development. The Proposed Action Alternative includes an updated Capital Facilities Plan.
13. Historic Preservation	✓	✓	Both alternatives include historic preservation and cultural resources protections in policies and codes.
14. Climate Change and Resiliency	−	+	The Proposed Action Alternative includes a new Climate and Resiliency Element that meets current state laws for climate change and community resilience planning. The No Action Alternative includes some discussion of climate change and resilience, but does not meet minimum climate and resilience planning requirements set forth in the GMA.
15. Shorelines	✓	✓	Both alternatives maintain Sequim's Shoreline Master Program. No changes to the SMP are proposed in the Proposed Action.

Table Notes:
+ = Greater consistency
✓ = General consistency
− = Lesser consistency

3.2.2.2.2 Summary of Impacts

The Proposed Action Alternative updates the Comprehensive Plan for greater consistency with GMA requirements to consider housing at a variety of affordability levels, climate change planning and community resilience, transportation planning, and other recent legislative changes. The document has also been restructured and streamlined for ease of use and administration. Development regulations (SMC Title 18) are updated to meet recent legislative requirements and implement the comprehensive plan policies.

Threshold	No Action Alternative	Proposed Action Alternative
Consistent with GMA Goals and Periodic Update	+	✕

Table Key:
✕ No or Low Potential for Adverse Impact
+ Moderate Potential for Adverse Impact
+ High Potential for Adverse Impact

3.2.2.3 Mitigation Measures

Comprehensive Plan and Title 18

The Action Alternative 2025 Comprehensive Plan Land Use, Housing, Transportation and Climate Change and Resiliency Chapter, Appendix A Housing and Appendix B-1 Capital Facilities Plan include numerous goals and policies and required analysis that meet the legislative amendments to GMA and the periodic update requirements. The Action Alternative update to SMC Title 18 Zoning includes numerous new and updated development standards that respond to and meet the legislative mandates of GMA since 2015.

3.2.2.4 Significant Unavoidable Adverse Impacts

Significant and unavoidable adverse impacts are expected under the No Action Alternative, related to plans and policies, as the No Action Alternative does not meet the requirements of and is inconsistent with the Growth Management Act, as amended. Such inconsistency would be avoided through the Action Alternative.

3.2.3 Housing

3.2.3.1 Affected Environment

The City is required to show it can accommodate population and housing unit growth as part of the Comprehensive Plan Update per the requirements under the Growth Management Act (GMA). As adopted by Clallam County, Sequim must plan to accommodate 2,959 new persons and 1,850 new housing units. To provide context on how the Comprehensive Plan will meet these requirements, this section outlines the population and housing located in the city using the most recent data available. Future population and housing growth are the key drivers for many of the other components included in this DSEIS. For the 2025 Comprehensive Plan, Leland Consulting Group assisted the City with housing analysis. The following sections provide an overview of the existing household and housing conditions of Sequim; additional data and analysis are provided in Appendix A-1 of the 2025 Comprehensive Plan.

Population

According to the Washington Office of Financial Management (OFM), Sequim's population is 8,410 as of 2025. Since 2015, the city has added nearly 1,400 residents – an increase of 20 percent. This far outpaces the countywide growth of seven percent over the same period, as well as growth in nearby cities including Port Angeles and Port Townsend.

Figure 3.2.3-1 Population in Sequim 2015-2025

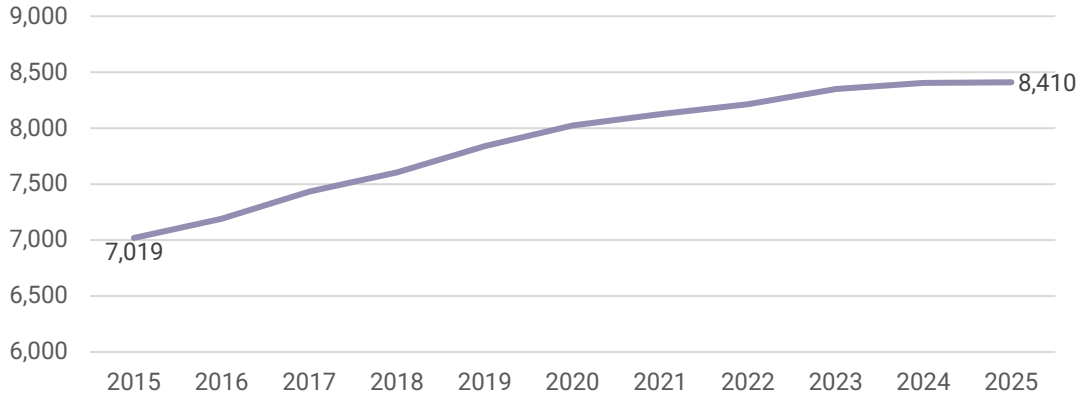
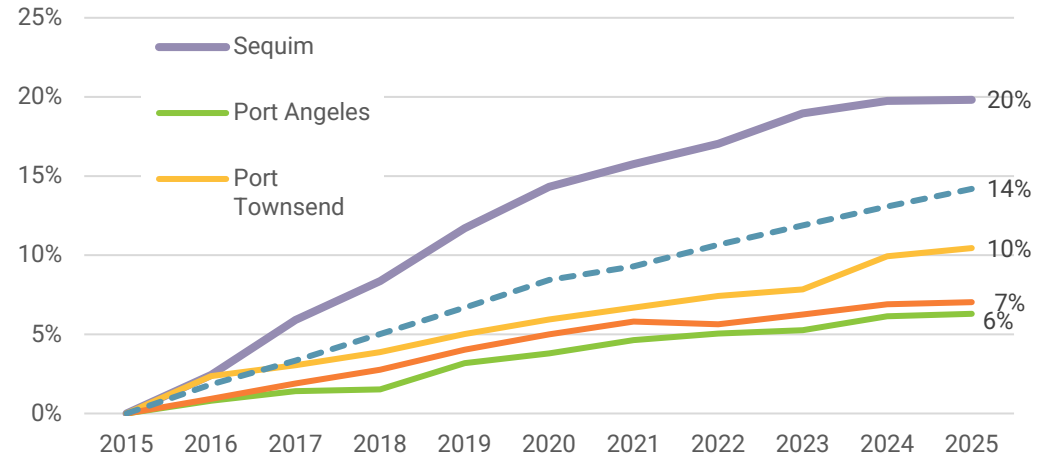


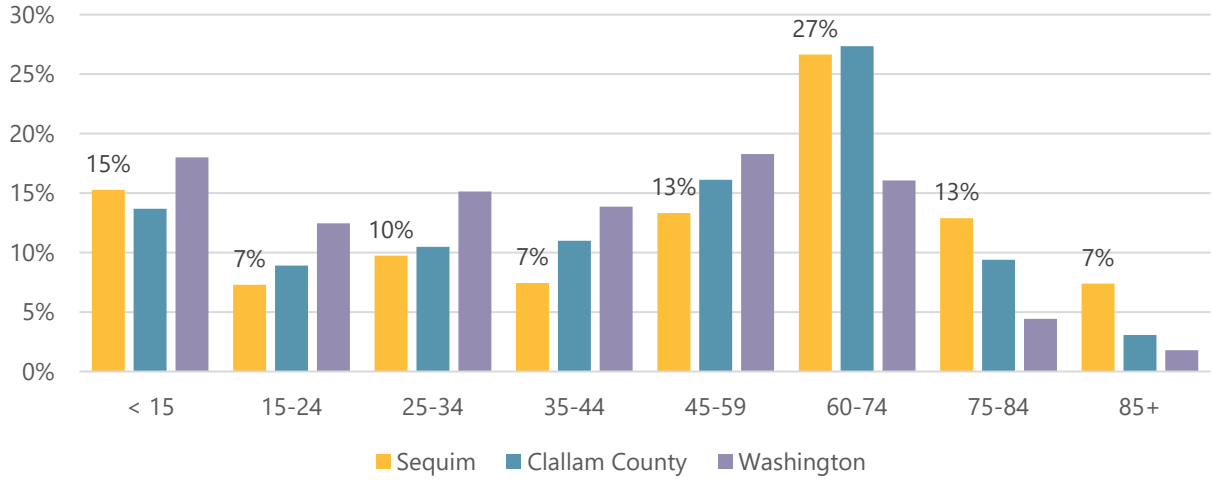
Figure 3.2.3-2 Cumulative Population Growth Sequim & Neighboring Jurisdictions, 2015-2025



Source: Washington Office of Financial Management (OFM).

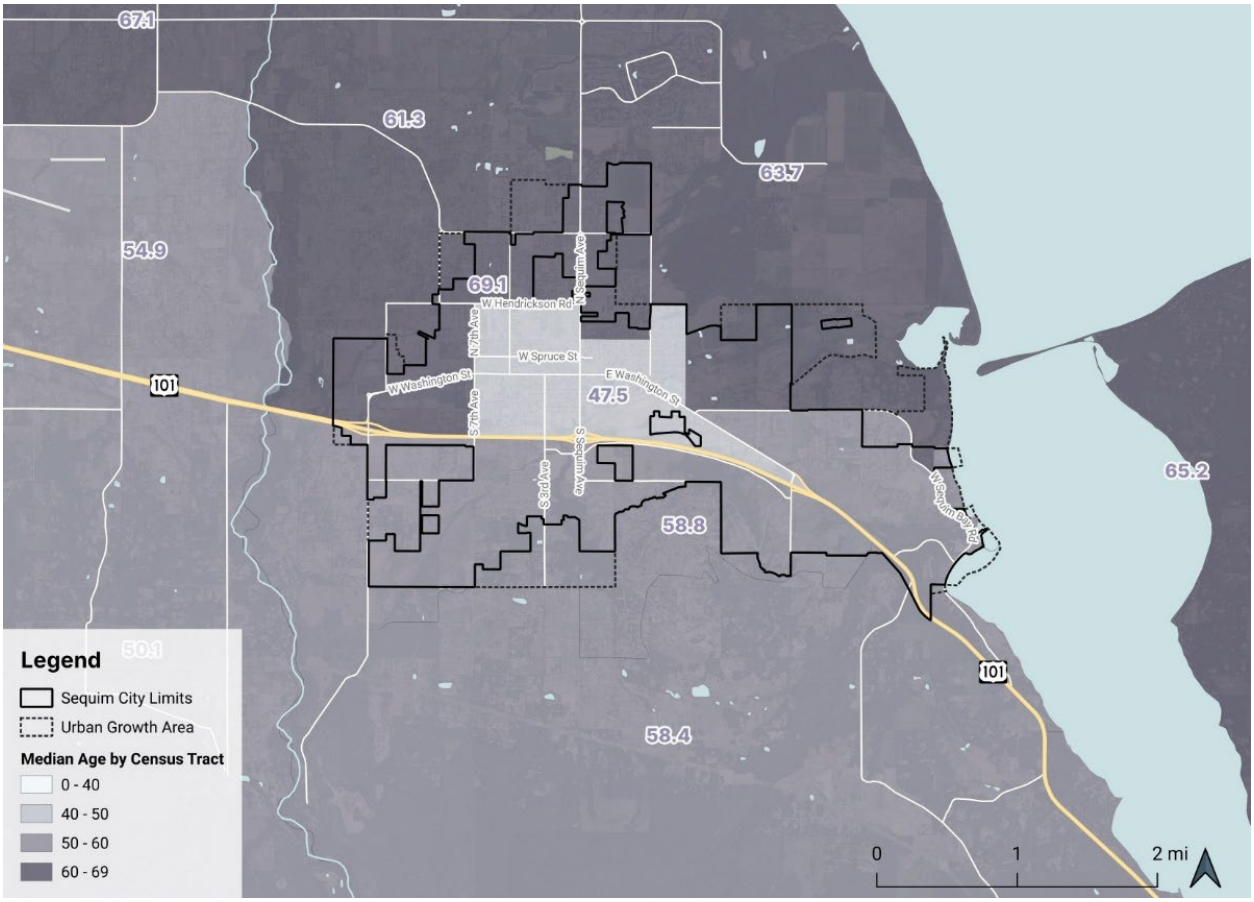
The median age in Sequim is 57.1, higher than both the County (51.2) and the state (38). In Sequim, 20 percent of the population is 75 years or older, compared with 12 percent countywide. Over a quarter of Sequim residents are between the ages of 60 and 74 years old. However, Sequim also has a slightly higher share of school-aged children under 15 years old than the County, which has 14 percent.

Figure 3.2.3-3 Share of Population by Age Group – Sequim, Clallam County, and Washington



Median age is not evenly distributed in Sequim. The map below shows median age by Census tract in and around the city. In central Sequim, the median age is significantly lower than in the surrounding neighborhoods and rural areas. The Census tract with the lowest median age contains the majority of Sequim's multifamily housing which likely partially accounts for this distribution. The Lifestyle District, a zoning designation in the northwest of the city, is designed to cater to older residents, and Census data corroborates an older population in this area.

Figure 3.2.3-4 Median Age by Census Tract, 2022

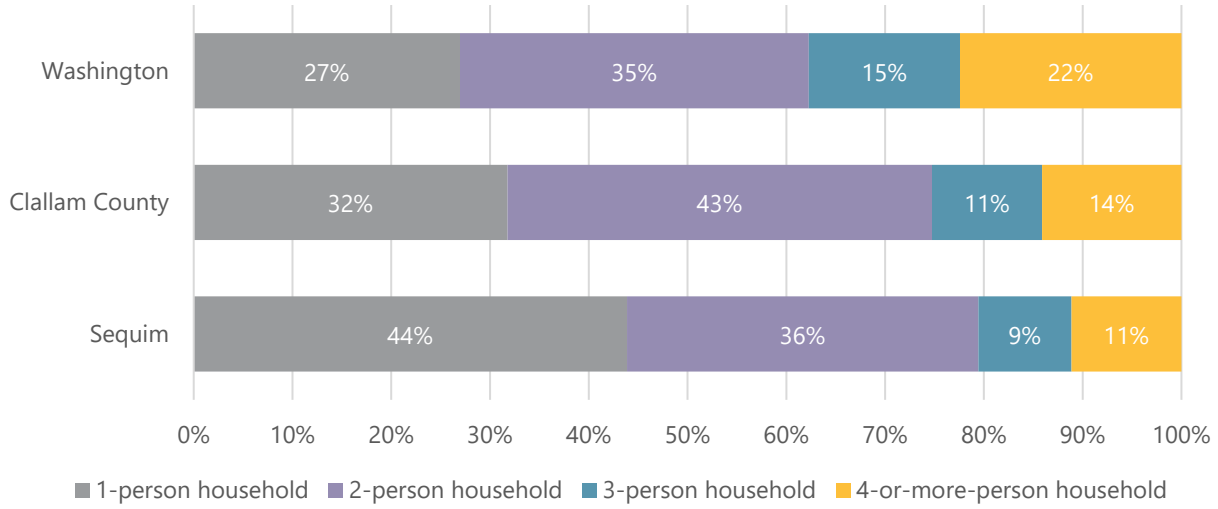


Source: U.S. Census Bureau 2023 American Community Survey, Table DP05; U.S. Census Bureau TIGER/Line Shapefiles

Household Characteristics

There are 3,969 households in Sequim as of 2022, including 2,025 family households and 1,944 non-family households. Of the family households, 70 percent are married-couple families. The average number of people per household is 1.92 for owner households and 1.99 for renter households, well below the statewide averages of 2.66 and 2.30, respectively. In Sequim, 44 percent of households have just one person, while an additional 36 percent have two people. The median household in Sequim has 1.93 residents, compared with 2.22 in Clallam County and 2.51 statewide. Sequim's smaller household sizes could indicate potential demand for smaller housing units, including studios and one-bedrooms, especially more accessible units that can help serve seniors who wish to age in their communities.

Figure 3.2.3-5 Share of Households by Number of Residents



Source: US Census Bureau 2022 5-Year ACS, Table S2501

Sequim's households are split relatively evenly between family and non-family households, largely due to the high share of residents living alone. More than a quarter of households (27 percent) are seniors living alone, while 16 percent of family households include children under 18 years old.

Figure 3.2.3-6 Household Characteristics in Sequim

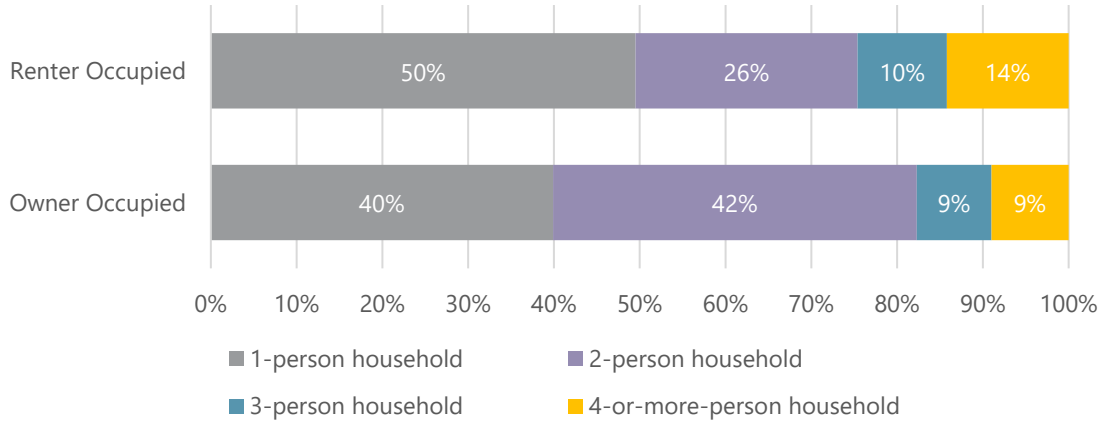
	Number	% of Total
Family households	**2,025**	**51%**
Married-couple family	1,423	36%
Other family	602	15%
With own children (under 18)	648	16%
Non-family households	**1,944**	**49%**
Householder living alone	1,741	44%
Householder 65+	1,074	27%

Source: US Census Bureau 2022 5-Year ACS, Table S2501

Housing Tenure

Sequim has 1,638 renter-occupied housing units and 2,331 owner-occupied housing units. The city has a higher share of renter households (41 percent) than the County (27 percent) or the state (36 percent). Half of the city's renter-occupied housing units have one person, compared with 40 percent of owner-occupied units. However, 82 percent of owner-occupied units have one to two residents compared with 76 percent of renter-occupied units. Among seniors living alone in Sequim, 37 percent rent their homes.

Figure 3.2.3-7 Housing Units by Tenure and Household Size

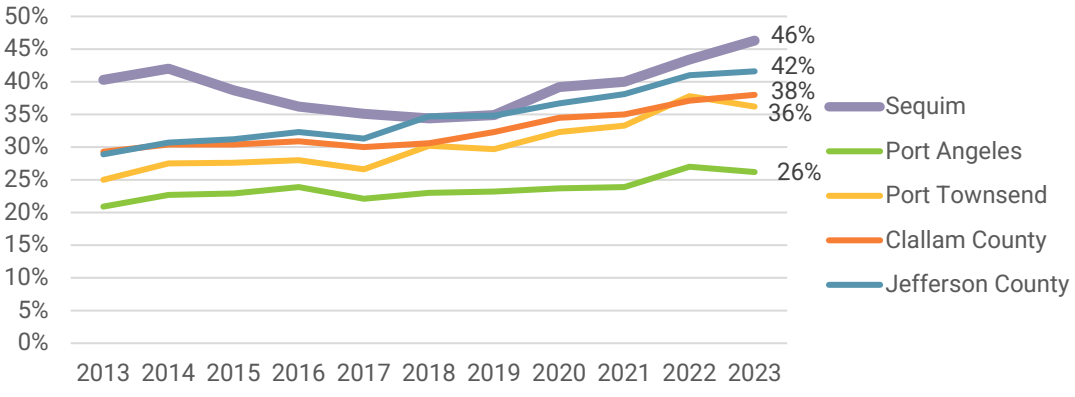


Source: US Census Bureau 2022 5-Year ACS, Table S2501.

Income

The median household income in Sequim is $48,105, lower than the countywide median of $66,108. Over a third of Sequim's households make below $35,000 annually, compared with 26 percent in Clallam County and 18 percent statewide. Compared to Clallam County overall, Sequim has a high share of households making less than $25,000 annually. The median household income in Sequim is $52,977, compared to $66,563 in Port Angeles and $60,015 in Port Townsend. Sequim's lower incomes are likely related to the age of the city's residents, many of whom are retirees not earning regular income. Citywide, 46 percent of households receive retirement income compared to 38 percent countywide and 26 percent in Port Angeles. This data suggests that Sequim's lower median income does not necessarily correlate with less spending power or wealth of its population.

Figure 3.2.3-8 Households with Retirement Income

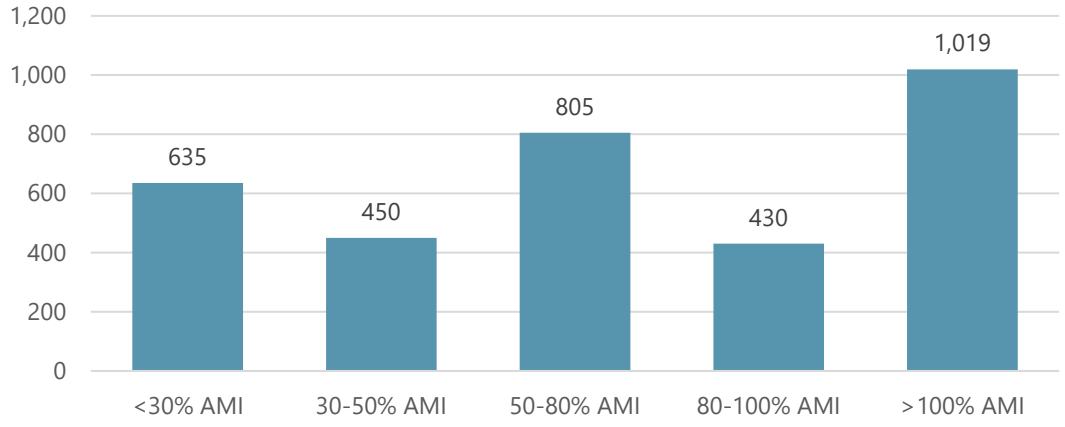


Source: *U.S.*

Source: US Census Bureau 2023 Five-Year ACS (Table DP03)

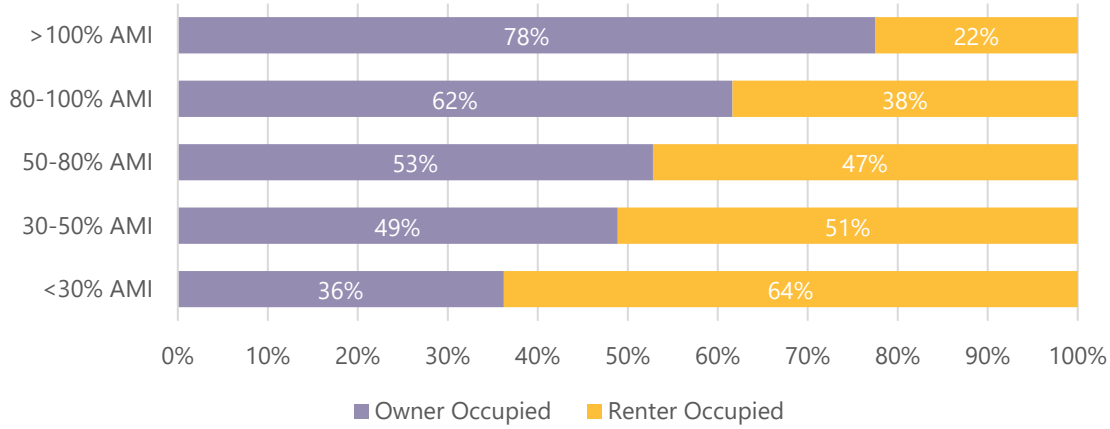
According to 2020 data from the US Department of Housing and Urban Development, over 1,000 households in Sequim earn more than the Area Median Income (AMI), while 1,890 make less than 80 percent AMI. The AMI for Clallam County as of 2024 is $93,900.

Figure 3.2.3-9 Households by Income Level



Source: US Department of Housing and Urban Development 2016-2020 Comprehensive Housing Affordability Strategy (CHAS).

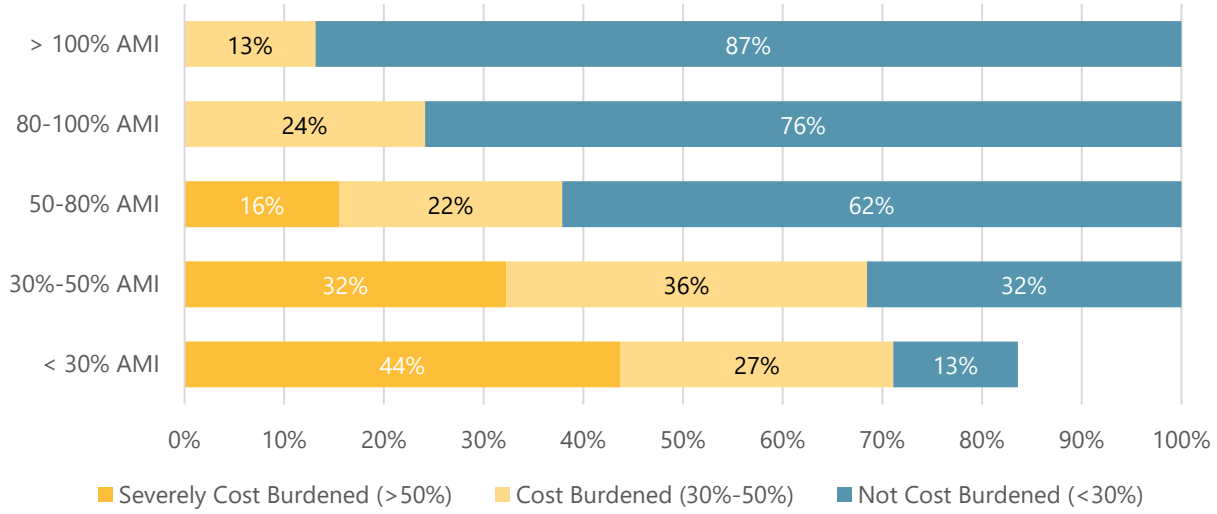
Figure 3.2.3-10 Household by Income Band and Tenure



Source: US Department of Housing and Urban Development 2016-2020 Comprehensive Housing Affordability Strategy (CHAS).

The US Department of Housing and Urban Development defines cost burdened households as those spending more than 30 percent of their income on housing costs. Severely cost burdened households spend more than 50 percent of their income on housing costs. In Sequim, 42 percent of households are cost burdened (spending over 30 percent of their income on housing costs). This includes 29.5 percent of owner households and 59 percent of renter households.

Figure 3.2.3-11 Housing Cost Burden by Income Band in Sequim



Source: US Department of Housing and Urban Development 2016-2020 CHAS Data.
Note: Total for very low income households (those making below 30 percent AMI) is less than 100 percent because cost burden was not reported for 105 households in this income range (16 percent).

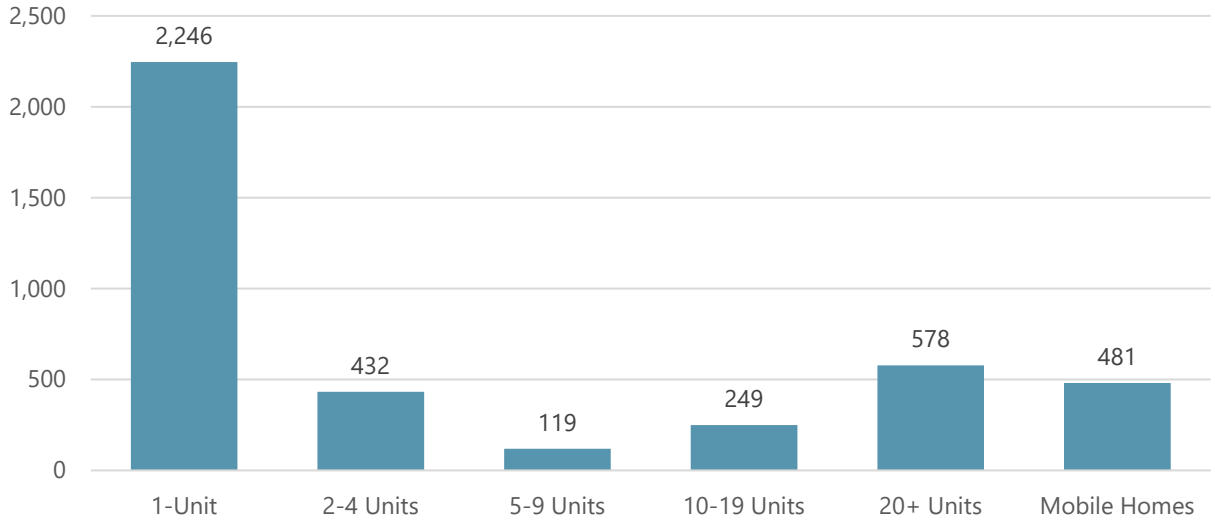
Special Housing

Special housing needs typically include housing types that are not commonly supplied on the open market. This includes housing for the elderly, people with disabilities, and homeless individuals and families. According to the Washington Office of Financial Management, as of 2024 Sequim has 527 units categorized as "mobile homes and special housing." This is a 23-unit increase since 2020. As of 2024, 7.6 percent of Clallam County's mobile home and special housing is located in Sequim. Most of these types of units (79 percent) are located in unincorporated areas of the county. Sequim currently has 16 units of permanent supportive housing (PSH), located in the Sunbelt Apartments, and no emergency housing.

Housing Inventory

Of the 4,105 housing units in Sequim, 55 percent (2,246) are in single unit detached or attached structures. The City is also home to 481 mobile homes.

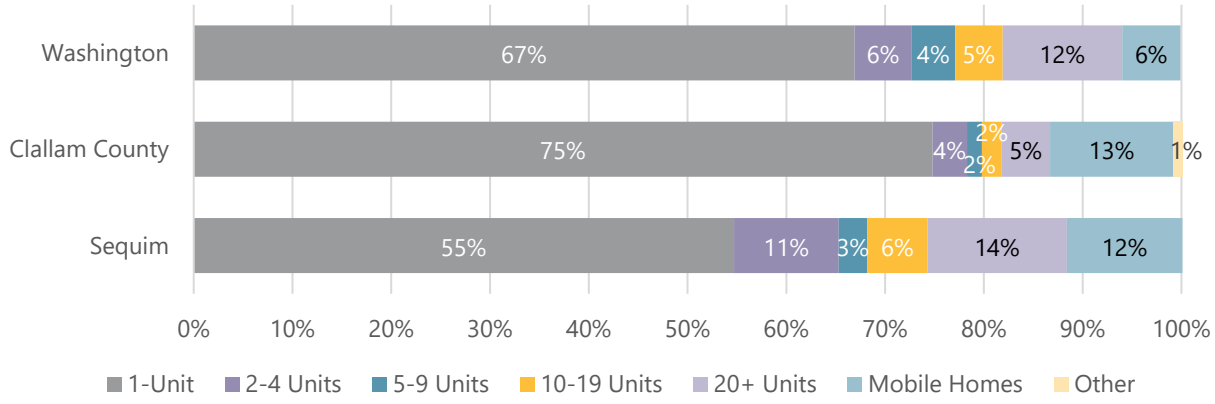
Figure 3.2.3-12 Number of Housing Units by Structure



Source: US Census Bureau 2022 5-Year ACS, Table DP04.

Sequim has a higher share of housing units in multifamily structures than the County or the state. In Sequim, 14 percent of homes are in structures with 20 or more units, compared to five percent countywide. Sequim also has a higher share of middle housing (homes in structures with two to four units) than Clallam County.

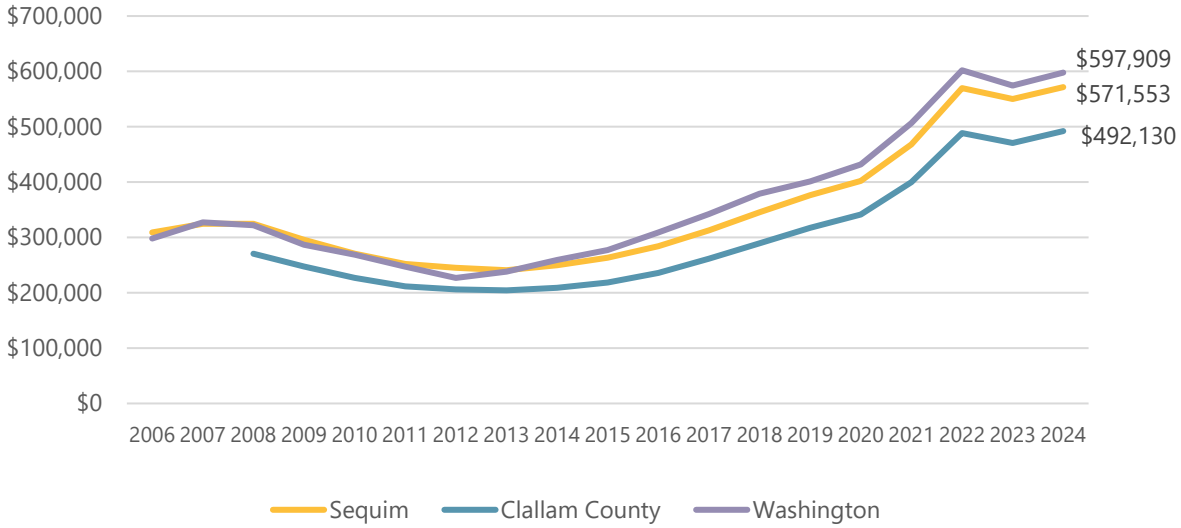
Figure 3.2.3-13 Housing Units by Type in Sequim, Clallam County, and Washington



Source: US Census Bureau 2022 5-Year ACS, Table DP04.

The Zillow Home Value Index (ZHVI) reflects the typical value for homes in the 35th to 65th percentile range. As of April 2024, the typical home value in Sequim is $571,553 – higher than the County overall but lower than statewide home values. The typical home value in Sequim has grown by 85 percent since 2006, when it was $309,045. Although home value increases have slowed since 2021, they are once again on an upward trajectory.

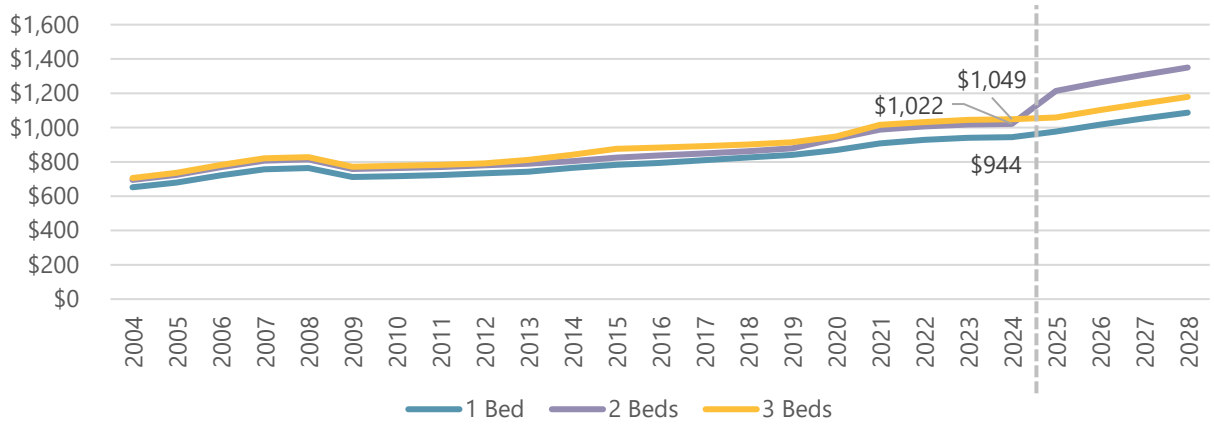
Figure 3.2.3-14 Typical Home Values in Sequim, Clallam County and Washington



Source: Zillow Home Value Index (ZHVI). Data as of April of each year.

Over the past 20 years, rent in Sequim has increased 45 percent for one-bedroom units, 47 percent for two-bedroom units, and 49 percent for three-bedroom units. As of Q1 2024, the market asking rent per square foot is $1.31, up from $0.90 in 2004 (an increase of 46 percent).

Figure 3.2.3-15 Market Rent per Unit Type in Sequim

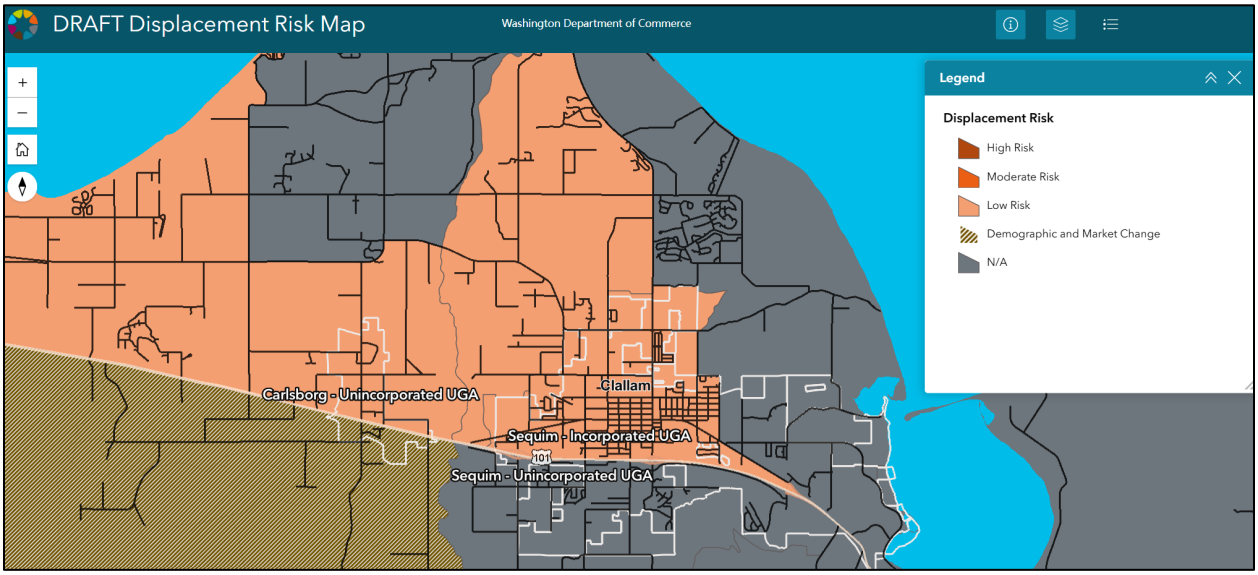


Displacement Risk

Sequim has a relatively low displacement risk compared with nearby communities. Figure 3.2.3-14 below shows Washington Department of Commerce's Draft Displacement Risk Map

– most of Sequim is considered "lower risk" compared with Port Angeles and Forks, where the risk rises to "Moderate" and "High."

Figure 3.2.3-16 Washington Department of Commerce Draft Displacement Risk Map for Sequim



Source: Washington State Department of Commerce Displacement Risk Map experience builder

Housing Growth Allocations

The GMA requires that each jurisdiction have enough developable land to accommodate the 20-year projected population growth. The City of Sequim retained Leland Consulting Group to conduct an extensive land capacity analysis as part of the 2025 Comprehensive Plan Update and is included as Appendix A-3. The GMA housing growth allocation assigned to Sequim is 1,850 new housing units.

Table 3.2.3-1: Sequim Housing Growth Allocations

Housing Units	2020 Housing Units (Census)	New Housing Allocation	= 2045 Total Housing Units
Sequim City	4,369	1,850	6,219
Sequim UGA	769	298	1,067
Total	**5,138**	**2,148**	**7,286**

In 2021, the Washington Legislature changed the way communities are required to plan for new housing. House Bill 1220 amended the Growth Management Act to instruct local governments to "plan for and accommodate housing affordable to all economic segments of the population of the state." These requirements include an inventory and analysis of existing

and projected housing needs, including "units for moderate, low, very low and extremely low-income households", as well as "emergency housing, emergency shelters and permanent supportive housing (PSH)."

Table 3.2.3-2 2020-2045 County Allocations by Income Level for the City of Sequim and Urban Growth Area

	Allocation by Income Level							Emergency Housing/Beds
	0-30% Non-PSH	0-30% PSH	>30-50% AMI	>50-80% AMI	>80-100% AMI	>100-120% AMI	>120% AMI	
City Limits	623	280	568	227	80	61	11	191
UGA	100	45	91	37	13	10	2	0
Total	723	325	659	264	93	71	13	191

Source: Clallam County Resolution 101, 2024, Resolution 94, 2025, and Sequim Housing Needs Assessment (Appendix A-1)
PSH=Permanent Supportive Housing
AMI=Area Median Income; 2024 family AMI for Clallam County is $93,900.

The Land Capacity Analysis found that under existing zoning and pending units, Sequim has sufficient land capacity to accommodate its 2045 housing targets at all income bands. However, there was a small surplus of land capacity from what would be needed to serve households earning under 80% of AMI for the 2045 planning horizon. However, a couple of land use redesignations to mixed-use zoning, increase the capacity for multifamily housing, and ensure a buffer of available capacity. The land capacity analysis results by income band under existing and proposed land use redesignations as part of the 2025 Comprehensive Plan update are shown below.

Table 3.2.3-3 Land Capacity for Housing by Income Band under existing and planned Zoning in Sequim, 2020-2045

Income Band as a % of AMI	Aggregated Housing Needs	Total Capacity	Surplus/Deficit	Total Capacity	Surplus/Deficit
		Existing Zoning		Proposed Zoning w/Comprehensive Plan Update	
0-80%	1,698	1,702	4	1,918	220
80-120%	141	2,628	2,477	2,618	2,477
120%+	11	2,094	2,083	2,094	2,083
Total	**1,850**	**6,414**	**4,564**	**6,629**	**4,779**

Source: Figures 20 , 21 and 23 Appendix A-3 Land Capacity Analysis

The Emergency Housing Land Capacity Analysis found adequate capacity for Sequim's target of 191 emergency shelter beds within the Regional Commercial, Highway Commercial, Community Mixed Use, and Opportunity Area districts.

3.2.3.2 Impacts

3.2.3.2.1 Impacts Common to Both Alternatives

Development will continue in Sequim under either alternative, expanding housing supply opportunities as vacant or underutilized parcels are developed or redeveloped, and resulting in increased development intensity over time. In both the No Action and the Proposed Action Alternatives, growth will follow a similar future housing pattern continuing the development of single-family, moderate density housing and mixed use in select areas. Both alternatives have sufficient land capacity for housing units.

Consistency with GMA Housing Requirements

The No Action Alternative is less consistent with goals and policies related to housing choice and affordability. The Proposed Action Alternative was developed to comply with changes in the GMA, identified in Table 2.2-1; the most substantive are summarized below:

- HB 1220 (2021) requiring Housing Elements to include an inventory and analysis of existing and projected housing needs that identifies the number of housing units necessary to manage projected growth including units for moderate, low, very low, and extremely low income households. This includes planning for emergency and permanent supportive housing. Analyzing racially disparate impacts and addressing equity is also required.
- HB 1337 (2023) requiring jurisdictions to increase the flexibility of their accessory dwelling unit codes.
- HB 1043 (2023) requiring provisions to promote the conversion of existing commercial and mixed-use buildings to multi-family.
- HB 2266 (2026) allow transitional housing, permanent supportive housing, indoor emergency shelters, and indoor emergency housing (STEP) in any zoning district that are not zoned for industrial uses.

Prior to 2021, jurisdictions were required to plan for coordinated growth by ensuring adequate land capacity for specific housing and employment allocations. After adoption of HB 1220, jurisdictions are still required to plan for housing and employment allocations, but housing allocations are broken down into housing affordable to all income levels, including emergency shelters, transitional housing, emergency housing, and permanent supportive housing (STEP housing). Land capacity must consider the housing affordability breakdown. The Proposed Action Alternative includes updated policies and development regulations to meet targets for each housing affordability band as required under the GMA. In addition, as required by HB 1220, an updated Housing Needs Assessment, Adequate Provisions and Racially Disparate Impacts Analysis were completed with the 2025 Comprehensive Plan Update and included in Appendix A of the Plan.

3.2.3.2.2 Impacts of No Action and Action Alternatives

No Action Alternative

As noted in Table 3.2.3-3 above, the No Action Alternative provides sufficient capacity to meet the allocated housing unit targets for all income bands. However, this alternative results in only a surplus of four housing units at the 0-80% AMI income band. In this Alternative, the Emergency Housing Land Capacity Analysis was also found to provide adequate capacity for Sequim's target of 191 emergency shelter beds within the existing zoning designations of Regional Commercial, Highway Commercial, Community Mixed Use and Economic Opportunity Area districts. The largest impact of the No Action Alterative is found in the failure to meet certain elements of the GMA housing requirements, not providing sufficient capacity for housing at all income bands, such as not considering a variety of housing types and the required analyses of a Housing Needs Assessment, Adequate Provisions, Land Capacity analysis or Racially Disparate Impacts.

Action Alternative

The Proposed Action Alternative is designed to provide sufficient capacity for housing at all income bands, meet the housing growth allocation and provide for a variety of housing types. Additionally, the Action Alternative includes goals and policies, required technical analysis as required by HB 1220 and zoning code updates responsive to recent state legislation. Development impacts are outlined in Section 3.2.1 Land Use.

3.2.3.2.3 Summary of Impacts

Both the No Action and Action Alternatives would see an increase in the number of housing units. Housing affordability would continue to be a challenge under both alternatives due to regional and state pressures. The Action Alternative proposed land use and zoning changes is anticipated to increase housing supply and diversity, reducing competition for available units. Under the No Action Alternative, several of the GMA housing requirements are not met.

Mitigation measures have potential to increase the supply of units affordable to low-income households, but significant investment from state and/or federal sources would be required to meet all low-income, supportive, and emergency housing needs.

Threshold	No Action Alternative	Proposed Action Alternative
Meets GMA Requirements for Housing Elements	⊕	⊗
Provides Adequate Land Capacity for Growth Allocations	⊗	⊗
Addresses Land Capacity for Housing Income Bands	⊕	⊗
Promotes a diversity of housing types	⊕	⊗
Incorporates Housing Needs Assessment, Adequate Provisions and RDI Analysis	⊕	⊗

Displacement Risk	✕	✕

Table Key:
✕ No or Low Potential for Adverse Impact
+ Moderate Potential for Adverse Impact
+ High Potential for Adverse Impact

3.2.3.3 Mitigation Measures

Comprehensive Plan Policies and Appendices

The Action Alternative 2025 Comprehensive Plan Land Use and Housing Chapters, and Appendix A include numerous goals and policies and required analysis that meet the legislative amendments to GMA and the periodic update requirements. The Action Alternative update to SMC Title 18 includes numerous new and updated development standards that respond to and meet the legislative mandates of GMA and ensures adequate land capacity for housing income bands.

Proposed SMC Title 18 Regulations

The following highlight the amendments to SMC Title 18 that are housing-related, intended to address the recent housing legislation:

- Updates residential zoning districts to support additional housing capacity, including increasing the R4-8 district to R4-9 and revising density, lot size, setback, and dimensional standards.
- Implements state-required housing legislation by allowing additional housing types, including supportive housing, transitional housing, emergency housing, co-living, and permanent supportive housing, where required.
- Replaces the Accessory Dwelling Unit (ADU) regulations to comply with state law by allowing up to two ADUs per lot, removing owner-occupancy requirements, reducing parking requirements, and allowing ADUs to be sold or separately owned.
- Establishes a new Affordable Housing Exceptions chapter that provides development incentives and regulatory flexibility for qualifying low income housing projects while requiring long-term affordability.
- Establishes new cluster housing standards to encourage a greater diversity of housing types and more efficient residential land development.
- Revises Planned Residential Development (PRD) standards to provide more predictable density calculations and greater flexibility for housing design while allowing limited neighborhood-serving commercial uses.
- Updates residential use tables and definitions to clearly identify permitted housing types and reduce reliance on discretionary use determinations.
- Modernizes off-street parking standards by reducing or eliminating minimum parking requirements for housing where required by state law.

- Creates a new chapter regulating transitory accommodations on religiously owned properties, consistent with state requirements.
- Updates site plan review, design review, and permit procedures to streamline residential development while maintaining compatibility with surrounding neighborhoods.

Other Mitigations

- State Review: As required by GMA, the City of Sequim will notify the Department of Commerce (at least 60 days in advance) of intent to adopt and provide a copy of the draft Comprehensive Plan amendments and development regulations for review and comment prior to final adoption.
- Updates in 2026 to City's Land Division Ordinance (Title 17).
- Implementation of recommendations from 2025 Housing and Economic Market Analysis prepared by Leland Consulting for City of Sequim.

3.2.3.4 Significant Unavoidable Adverse Impacts

Significant and unavoidable adverse impacts are expected under the No Action Alternative related to housing growth targets and accommodation of housing at income bands, lack of technical analyses and updates to development regulations, as it is inconsistent with the Growth Management Act. Such inconsistency would be avoided through the periodic update comprehensive plan's policies and analyses, and zoning code amendments proposed under the Action Alternative.

3.2.4 Transportation

3.2.4.1 Affected Environment

The City of Sequim maintains a multi-modal transportation system that supports the movement of residents, employees, visitors, freight, emergency services, and goods throughout the city and surrounding Urban Growth Area (UGA). Transportation planning within Sequim is guided by the Growth Management Act (GMA), the City's Comprehensive Plan, and the Transportation Master Plan (TMP), which establishes the long-range vision for transportation investments. The TMP evaluates existing transportation conditions, forecasts future travel demand, establishes multimodal level of service standards, and identifies transportation improvements needed to accommodate planned growth while improving safety, accessibility, and mobility.

3.2.4.1.1 Roadway Network

The City's roadway network consists of a hierarchy of principal arterials, minor arterials, collectors, and local streets that provide access to residential neighborhoods, employment centers, schools, parks, medical facilities, and commercial areas. Washington Street serves as

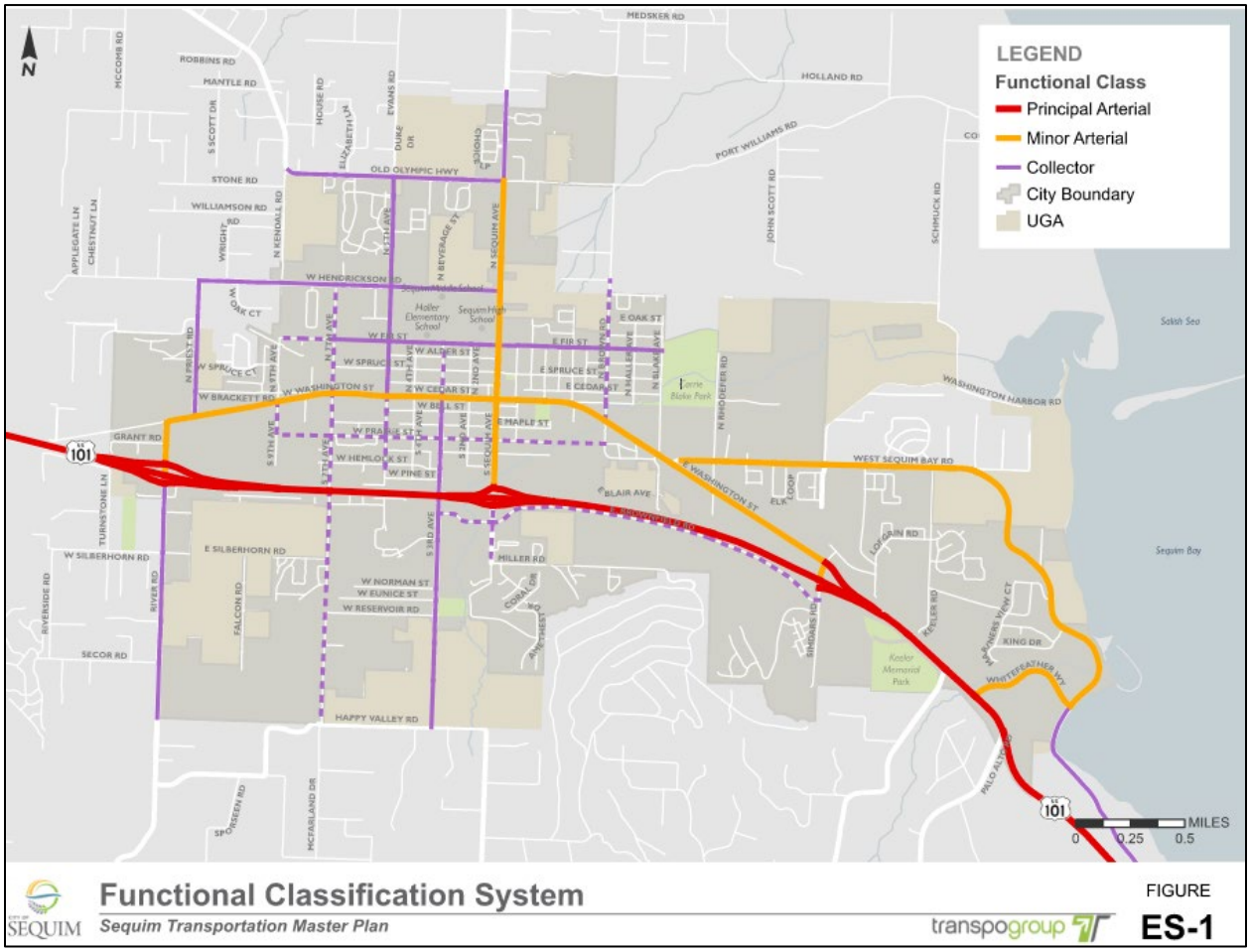
the City's primary east-west arterial and commercial corridor, connecting regional retail centers, downtown Sequim, and the U.S. Highway 101 corridor. Sequim Avenue functions as the principal north-south route through the community and provides access between downtown, residential neighborhoods, and Highway 101.

The City classifies its roadway network according to the functional role each roadway serves in moving people and goods throughout the community. Principal arterials provide regional mobility by carrying higher traffic volumes between activity centers and connecting to the state highway system. Minor arterials distribute traffic between principal arterials and major destinations within the city. Collector streets gather traffic from local streets and convey it to the arterial network while also providing access to neighborhoods, schools, parks, and commercial areas. Local streets primarily provide direct access to adjacent properties and are designed to support lower traffic volumes and neighborhood circulation. This functional classification system assists the City in planning roadway improvements, preserving roadway capacity, managing access, and coordinating future transportation investments with anticipated growth.

Table 3.2.4-1: Roadway Classifications

Road Type	Purpose	Example
Principal Arterial	A limited access, high-speed roadway that connects Sequim with the rest of the Olympic Peninsula and state.	SR 101
Minor Arterial	Minor arterial streets provide intra-neighborhood connections and predominantly serve through trips.	Washington Street
Collector	Collectors distribute trips between local streets and arterials and serve as transitions roads to or from residential areas.	3rd Avenue
Local Street	Local streets provide circulation and access within residential neighborhoods.	Dunlap Avenue

Figure 3.2.4-1 Sequim Roadway Functional Classifications



Source: 2026 Sequim Transportation Master Plan

3.2.4.2 Level of Service

Roadway traffic operations in Sequim are assessed using intersection level of service (LOS), which is a measure of vehicular delay, typically reported for the busiest hour of each day. For most communities, this tends to be the afternoon (PM) commute hour; however, in Sequim, due to the high percentage of retirees and concentration of regional shopping, the midday hours, between 12:00 – 2:00 PM, generally sees the highest peak in traffic volumes.

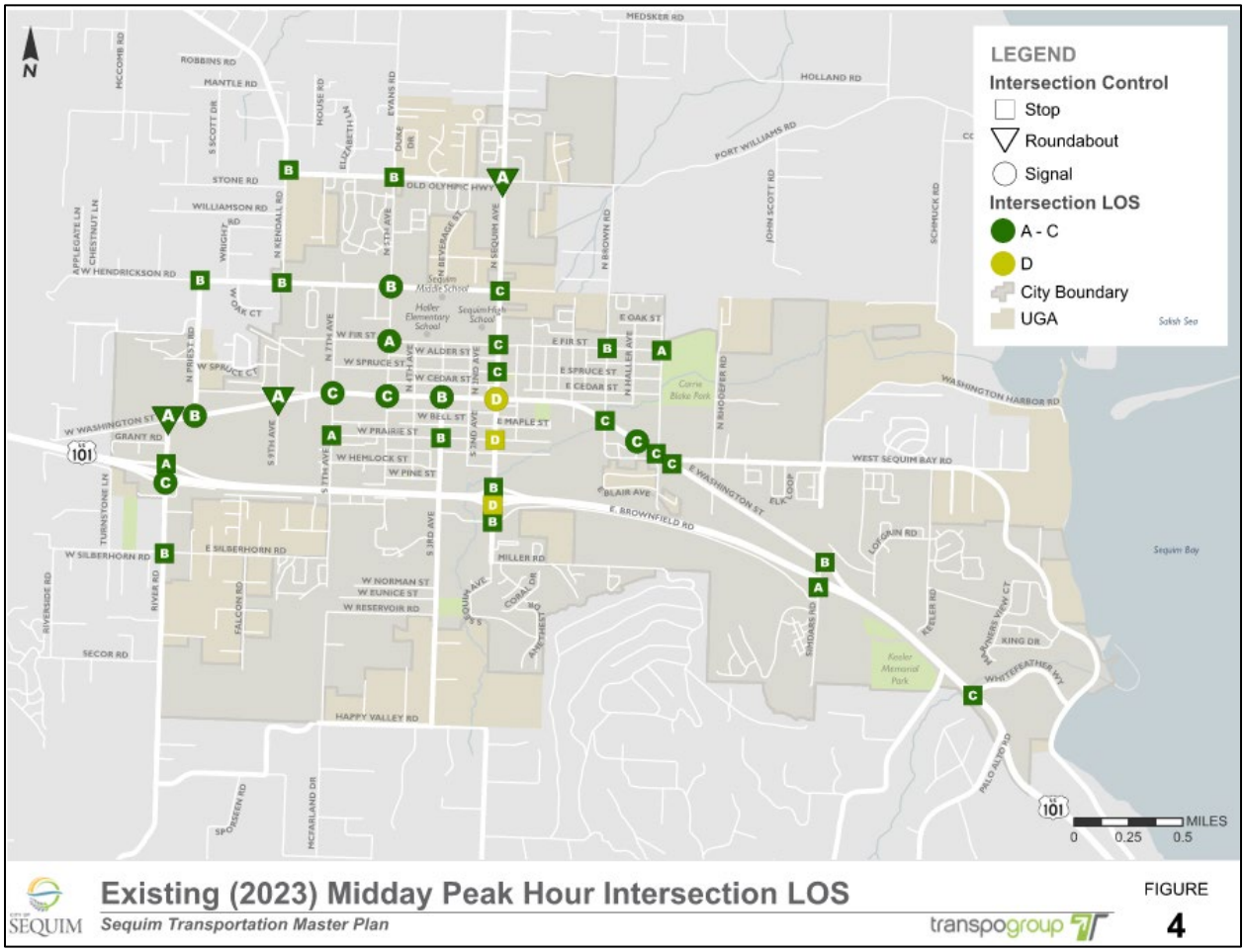
LOS is measured on a scale of A through F. Table 3.2.4-2 below provides a description of each level. Sequim's current LOS standard is LOS D or better, except along Washington Street which applies a LOS E standard outside of Downtown and a LOS F standard within Downtown, and WSDOT applies a LOS D or better standard along US-101 within the city.

Table 3.2.4-2 Vehicle Level of Service (LOS)	
A	Free-flow conditions
B	Stable operating conditions
C	Stable operating conditions, but individual motorists are affected by the interaction with other motorists
D	High density of motorists, but stable flow
E	Near-capacity operations, with speeds reduced to a low but uniform speed
F	Over capacity, with delays

Unlike many urban areas where peak travel occurs during weekday morning or afternoon commuter periods, Sequim experiences its highest traffic volumes during the midday period due to its unique demographic characteristics, retail activity, tourism, and visitor travel patterns. Traffic data collected during the summer of 2023 indicate that many vehicle trips begin and end within Sequim or the surrounding UGA, while regional travel is primarily oriented toward Port Angeles, eastern Clallam County, and destinations accessed via U.S. Highway 101. These travel characteristics influence transportation planning priorities and emphasize maintaining efficient access to commercial centers while expanding opportunities for walking, bicycling, and transit.

Sequim's current intersection LOS was analyzed at the weekday midday peak hour, the results of which are included in Figure 3.2.4-2 below. As depicted below, all intersections within Sequim currently meet the established LOS standard.

Figure 3.2.4-2 Existing Midday Hour Intersection LOS



Source: 2026 Sequim Transportation Master Plan

Pedestrians and Bicycles

The bicycle, pedestrian, and mobility scooter network varies widely throughout the City. Sidewalks are present on most arterials and collectors in Sequim:

- Washington Street
- Fir Street
- Hendrickson Road
- 7th Avenue
- 5th Avenue
- Sequim Avenue

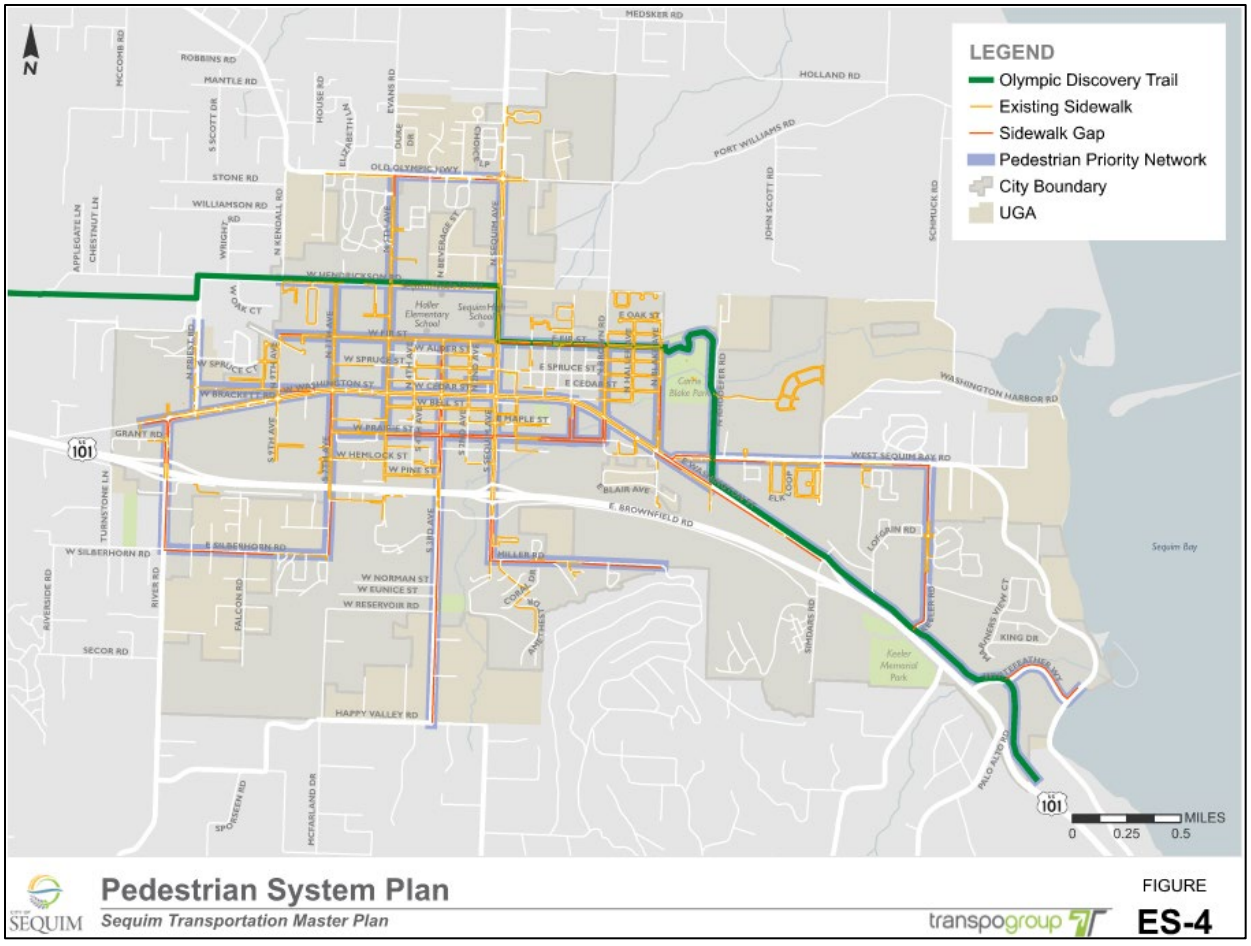
The downtown core has relatively complete sidewalk coverage, with one exception being the residential neighborhood west of Carrie Blake Park, bounded by Fir Street, Brown Road, Washington Street, and Sequim Avenue, which generally lacks sidewalks along the roadways.

While pedestrian and mobility scooter facilities are available are many parts of the city, these facilities do not universally comply with accessibility standards in the Americans with Disabilities Act (ADA). Particularly along Washington Street, sidewalk widths vary and driveway ramps are especially steep.

In 2023, the City adopted an ADA Transition Plan which provides prioritization for the removal of accessibility barriers and a schedule for addressing these concerns as the City as available funding. The ADA Transition Plan outlines the City's roadmap to bring pedestrian facilities in line with ADA standards.

Figure 3.2.4-3 below shows the City's current pedestrian facilities.

Figure 3.2.4-3 Existing Pedestrian System

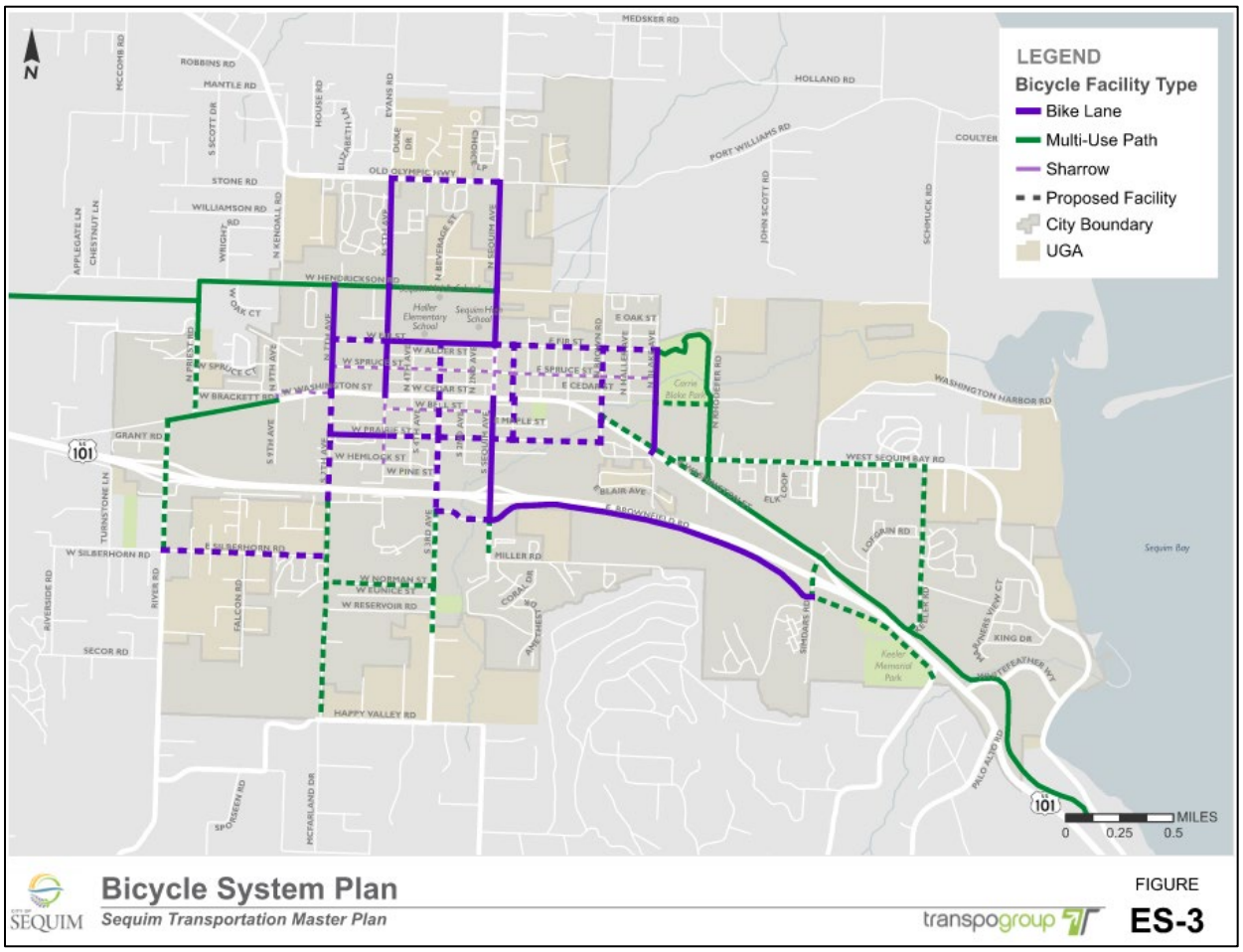


Source: 2026 Sequim Transportation Master Plan

Sequim's bicycle network includes a portion of the Olympic Discovery Trail (ODT) and local facilities. The ODT currently utilizes City streets and shared use paths within Sequim. There are bicycle lanes on 5th Avenue, 7th Avenue, Sequim Avenue (with a gap between Fir and

Washington), Blake Avenue and Brownfield Road. These existing facilities provide connections to the downtown core, schools, and the ODT. Figure 3.2.4-4 below shows the City's current bicycle network and future system plans.

Figure 3.2.4-4 Bicycle System



Source: 2026 Sequim Transportation Master Plan

Level of traffic stress (LTS) is the metric used to define the pedestrian and bicycle LOS standards within Sequim. LTS evaluates the quality and degree of comfort for pedestrian and bicycle facilities to determine improvements needed to encourage active transportation travel. LTS will be applied to pedestrian and bicycle facilities along the City's roadways.

LTS, as established by WSDOT, uses a 1 to 4 scoring to define the user comfort level as follows:

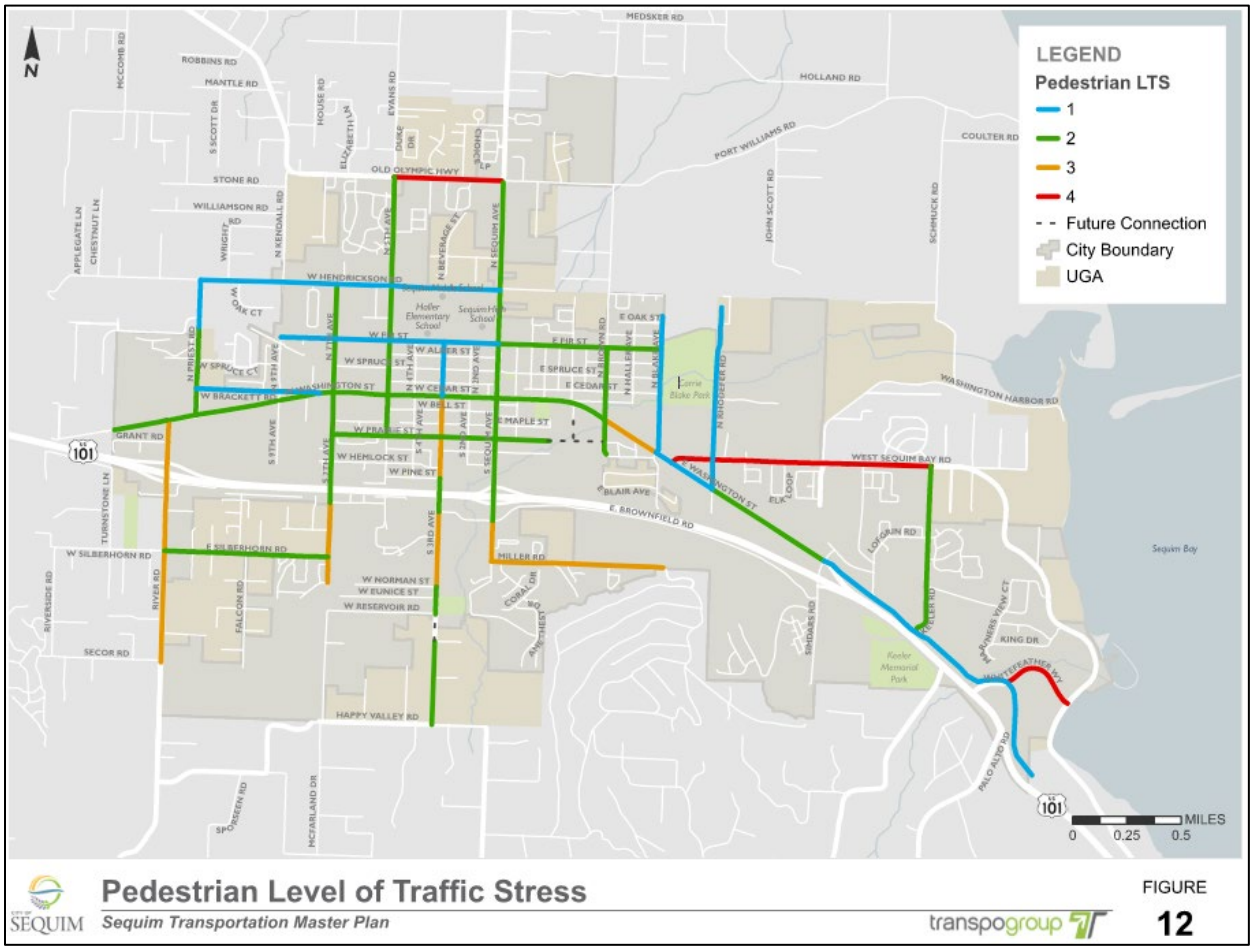
- LTS 1 is best, being suitable for users of all ages and abilities
- LTS 2 accommodates most users but may not be comfortable for some
- LTS 3 is suitable for confident pedestrians and bicyclists

- LTS 4 is not comfortable for most users and presents the highest stress level

The TMP establishes a pedestrian LOS standard of LTS 1 or 2 for pedestrian system plan network roadways and LTS 1 for the Olympic Discovery Trail. Similarly, an LTS of 1 or 2 or roadways identified in the bicycle system plan network and LTS 1 for the Olympic Discovery Trail is also set for the bicycle network.

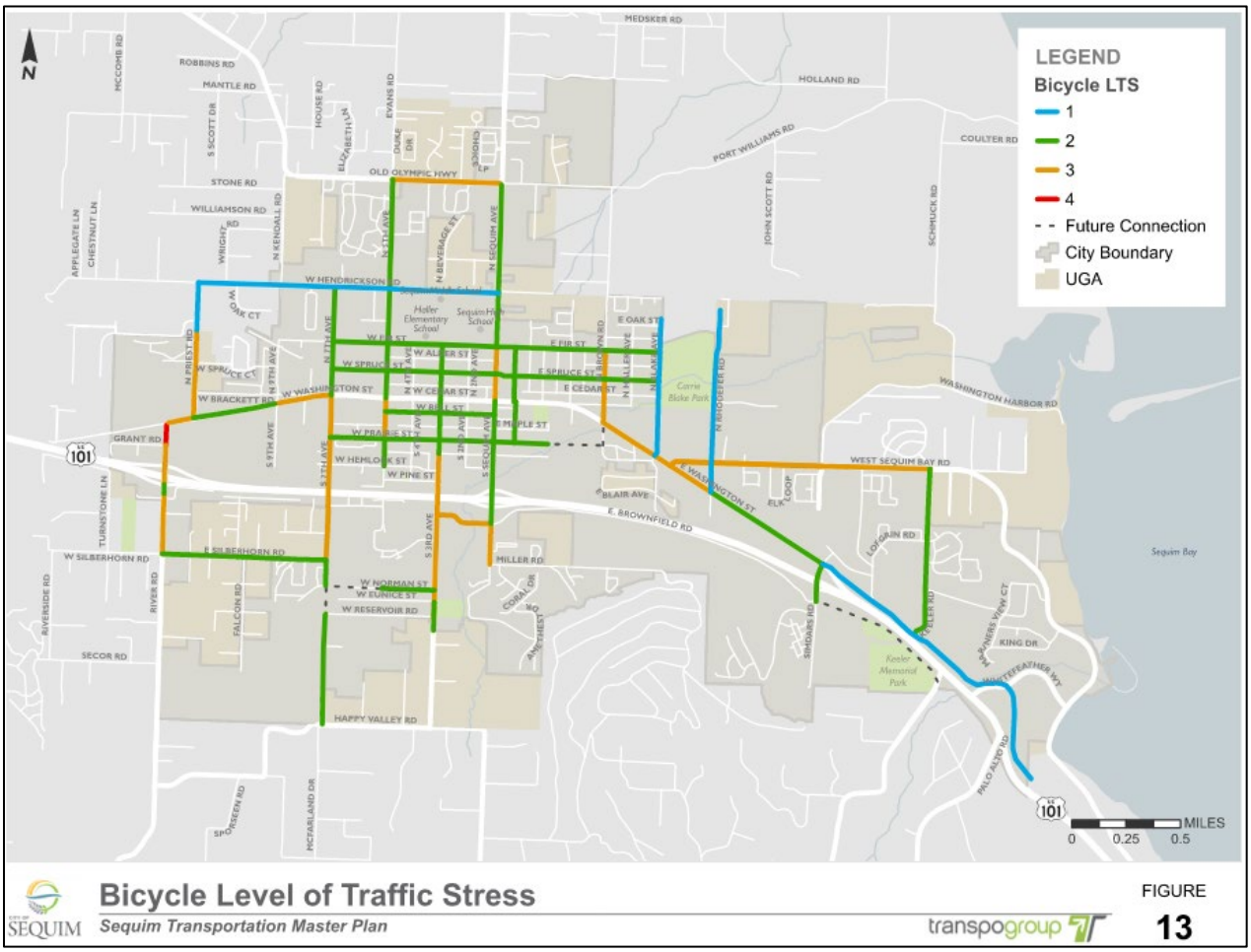
Figures 3.2.4-5 and -6 show the existing pedestrian and bicycle LTS levels for roadways within the pedestrian system plan network, respectively.

Figure 3.2.4-5 Pedestrian Level of Traffic Stress



Source: 2026 Sequim Transportation Master Plan

Figure 3.2.4-6 Bicycle Level of Traffic Stress



Source: 2026 Sequim Transportation Master Plan

Transit

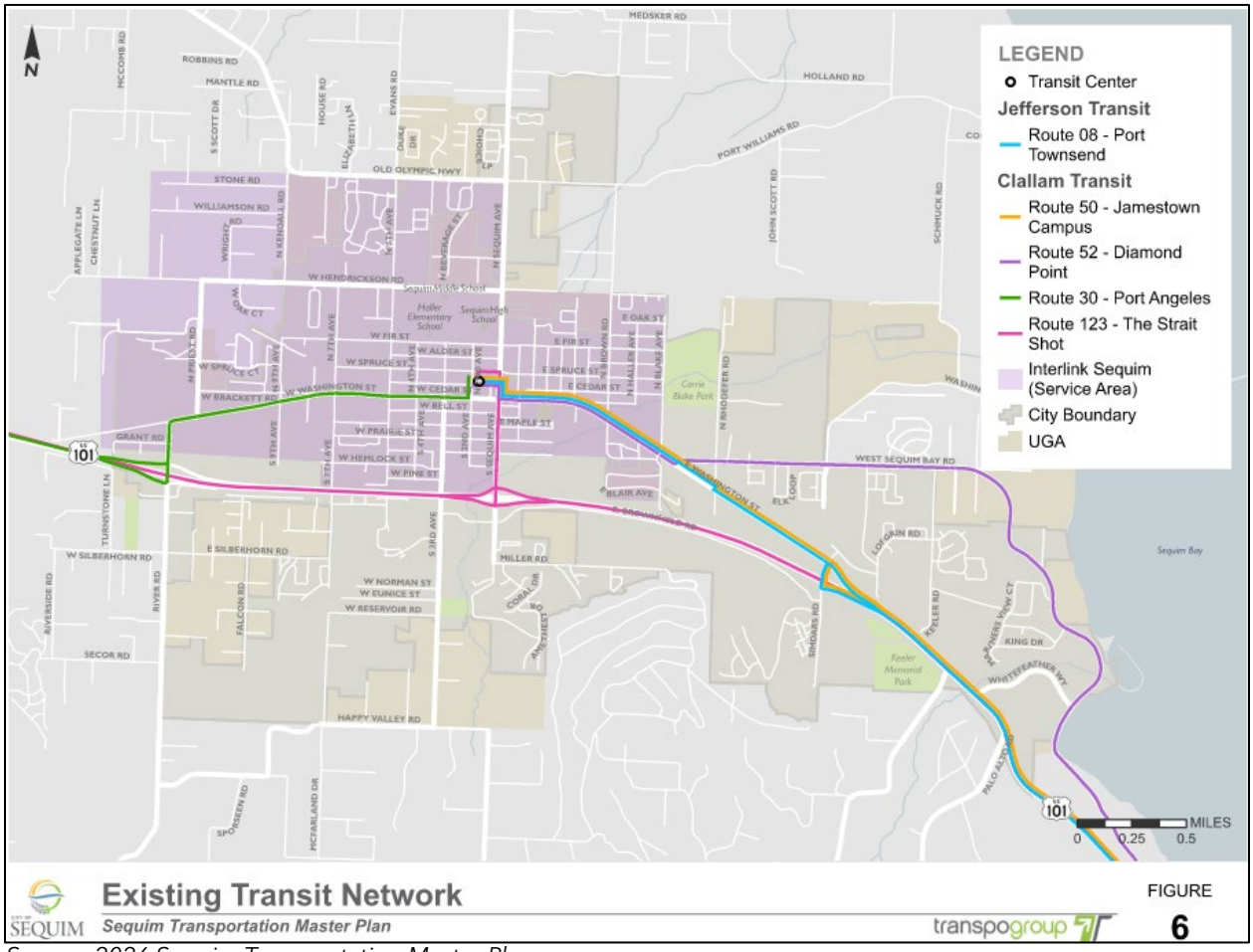
Transit service in Sequim includes both fixed-route and on-demand services. Figure 3.2.4-7 below shows the five bus routes and on-demand service operated in the City by either Jefferson Transit or Clallam Transit. Two additional intercity bus routes serve the City – the Dungeness Line (not shown below) and the Strait Shot (Clallam Transit route 123).

- The Dungeness Line is provided by WSDOT's Travel Washington service and operated by MTRWestern. Dungeness connects riders from Port Angeles to Downtown Seattle and SeaTac Airport via Sequim.
- Route 123, the Strait Shot**,** is an extension of Clallam Transit's service and connects riders from Port Angeles to the Bainbridge Island Ferry Terminal via Sequim.

Most routes operated by Jefferson and Clallam Transit connect to regional destination outside of Sequim, while one, Interlink Sequim, functions as an in-town circulator. Interlink

Sequim is an On-Demand service, which replaces Route 40, the Sequim Shuttle. All of these routes have a stop at the Transit Center on the corner of 2nd Avenue and Cedar Street.

Figure 3.2.4-7 Existing Transit Network



Source: 2026 Sequim Transportation Master Plan

In addition to the transit services, Sequim's transit system also includes private shuttle services affiliated with the numerous senior communities and assisted living centers. While the total number of riders of these private shuttles is uncertain, it is important to recognize the role that these shuttles play in providing transportation to populations that otherwise would not be able to drive. Without these private shuttle services, there would be a greater demand placed on the transit network in the city.

Freight and Goods Movement

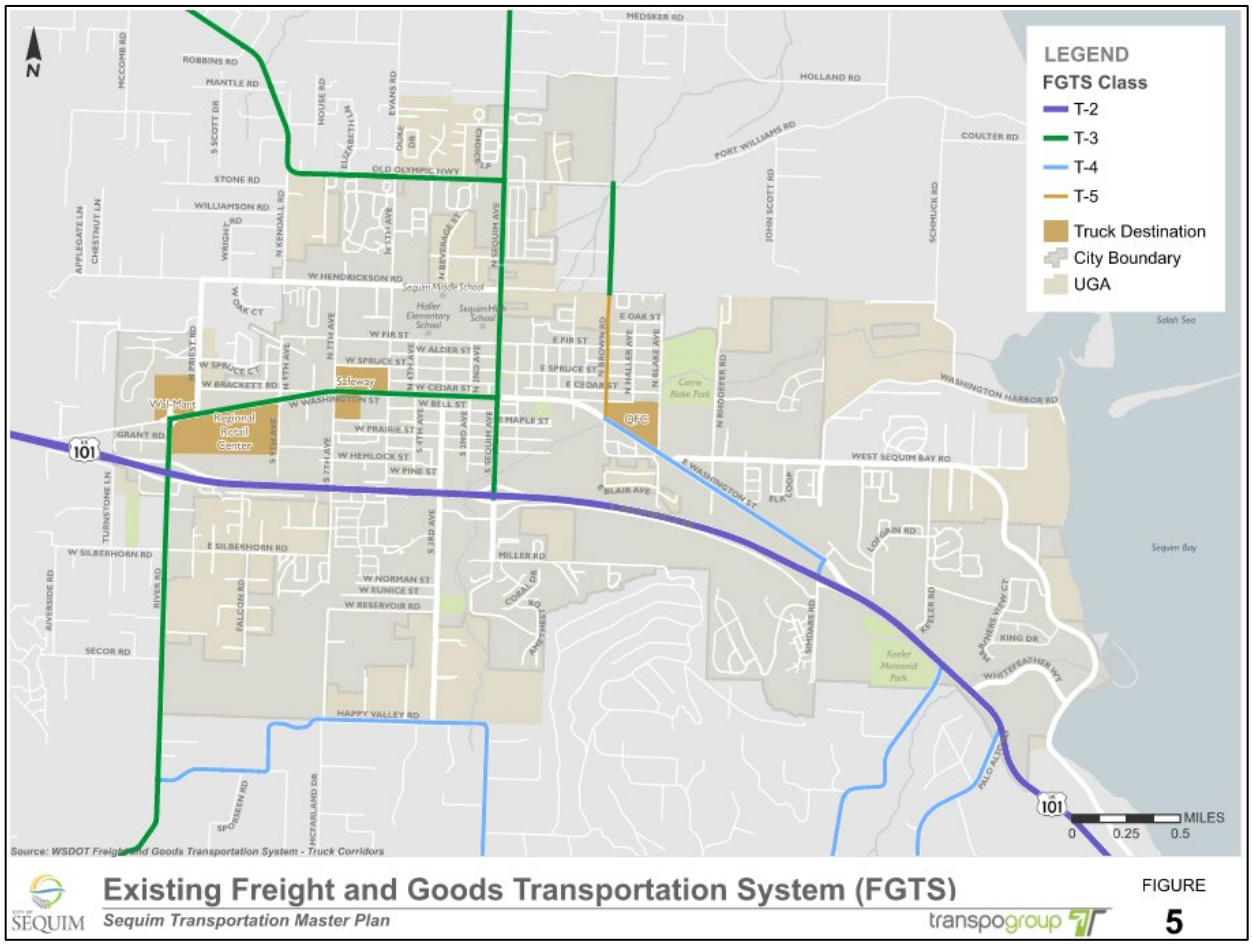
Freight in Sequim has been carried solely by trucks since the removal of the City's railroad tracks in 1986, and the majority of truck traffic originates from or destined for locations in Sequim comes from SR 101. Major freight destinations within Sequim include commercial

uses around the Washington Street / River Road intersection; and Safeway and QFC shopping centers located along Washington Street.

The predominant routes for all freight truck trips within the City include Sequim Avenue/Sequim-Dungeness Way, Old Olympic Highway, River Road, Brown Road, and parts of Washington Street. Other local delivery routes may be used as well. Major freight routes through the City are shown in Figure 3.2.4-8 below, and the major track and delivery routes are shown in Figure 3.2.4-8. The identified freight routes are those that are officially designated within WSDOT's Freight and Goods Transportation System (FGTS) network. The FGTS classification system of freight corridors for truck, rail, and waterways is based on annual freight tonnage, as summarized below:

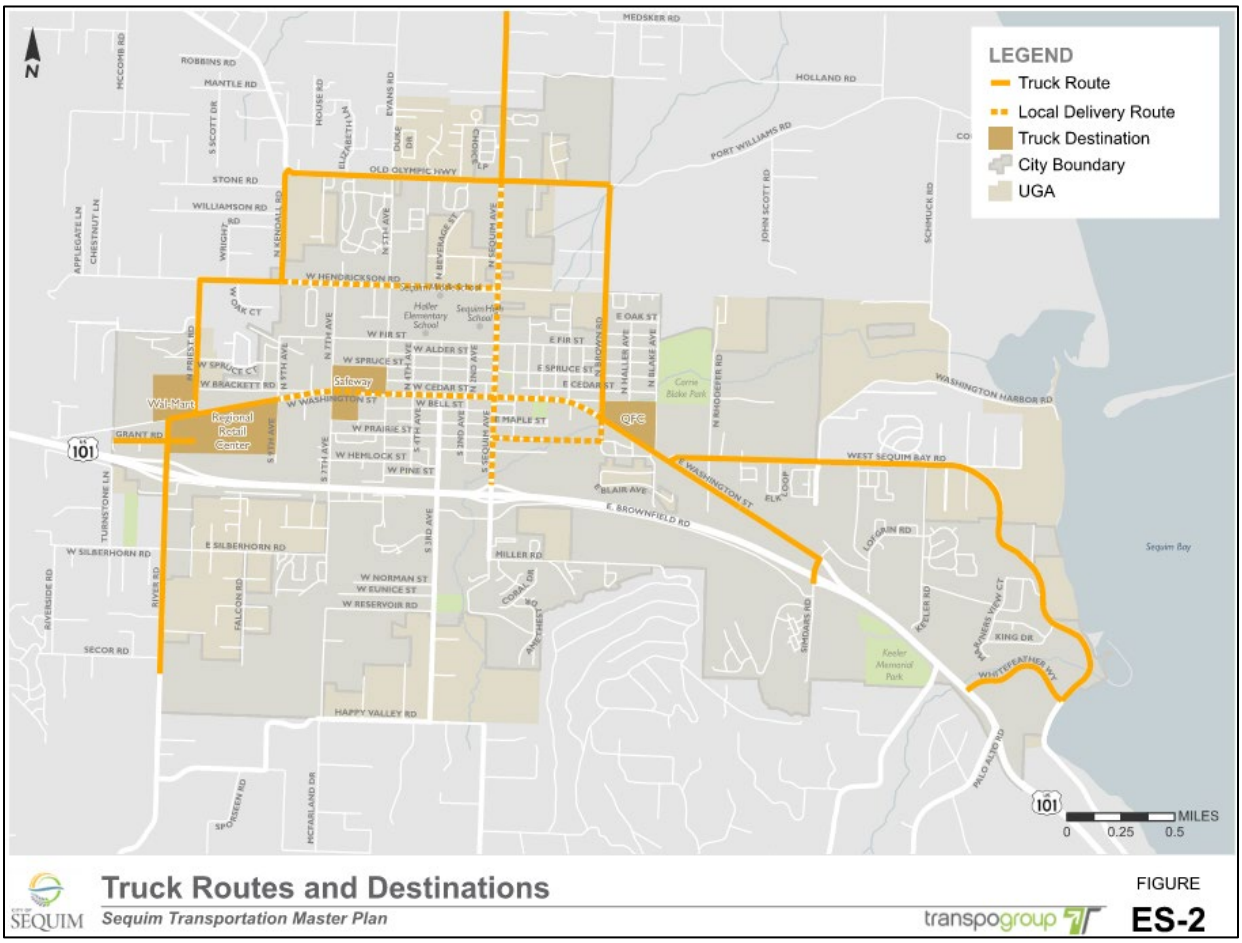
- T-1 = More than 10 million tons per year
- T-2 = 4 million to 10 million tons per year
- T-3 = 300,000 to 4 million tons per year
- T-4 = 100,000 to 300,000 tons per year
- T-5 = at least 20,000 tons in 60 days and less than 100,000 tons per year

Figure 3.2.4-8 Existing Freight and Goods Transportation System



Source: 2026 Sequim Transportation Master Plan

Figure 3.2.4-9 Truck Routes and Destinations



Source: 2026 Sequim Transportation Master Plan

3.2.4.3 Impacts

3.2.4.3.1 Impacts Common to both Alternatives

Most new housing growth anticipated within the City is expected to occur on undeveloped land south of SR 101 and on parcels in the east part of the City along West Sequim Bay Road. New multi-family housing growth is expected throughout the City and is expected to be constructed as middle-housing (i.e., duplexes, triplexes, etc.).

The City of Sequim plans to complete its roadway network as growth occurs, with a particular focus on providing connections between cul-de-sacs and dead-end streets. This work will provide a greater connected street network and provide additional possible east-west routes though the city, providing relief to the increasing traffic along Washington Street.

3.2.4.3.2 Impacts of No Action and Action Alternatives

No Action Alternative

While the existing roadway network generally provides adequate capacity to serve current travel demand, several intersections experience recurring congestion during seasonal tourism periods and midday peak travel. The Washington Street and Sequim Avenue intersection experiences the highest recurring delays within the City. Additional congestion occurs near the U.S. Highway 101 interchange due to incomplete interchange movements and regional traffic entering and exiting the highway. Summer festivals and special events can temporarily increase traffic queues along Washington Street, occasionally extending to the Highway 101 ramps.

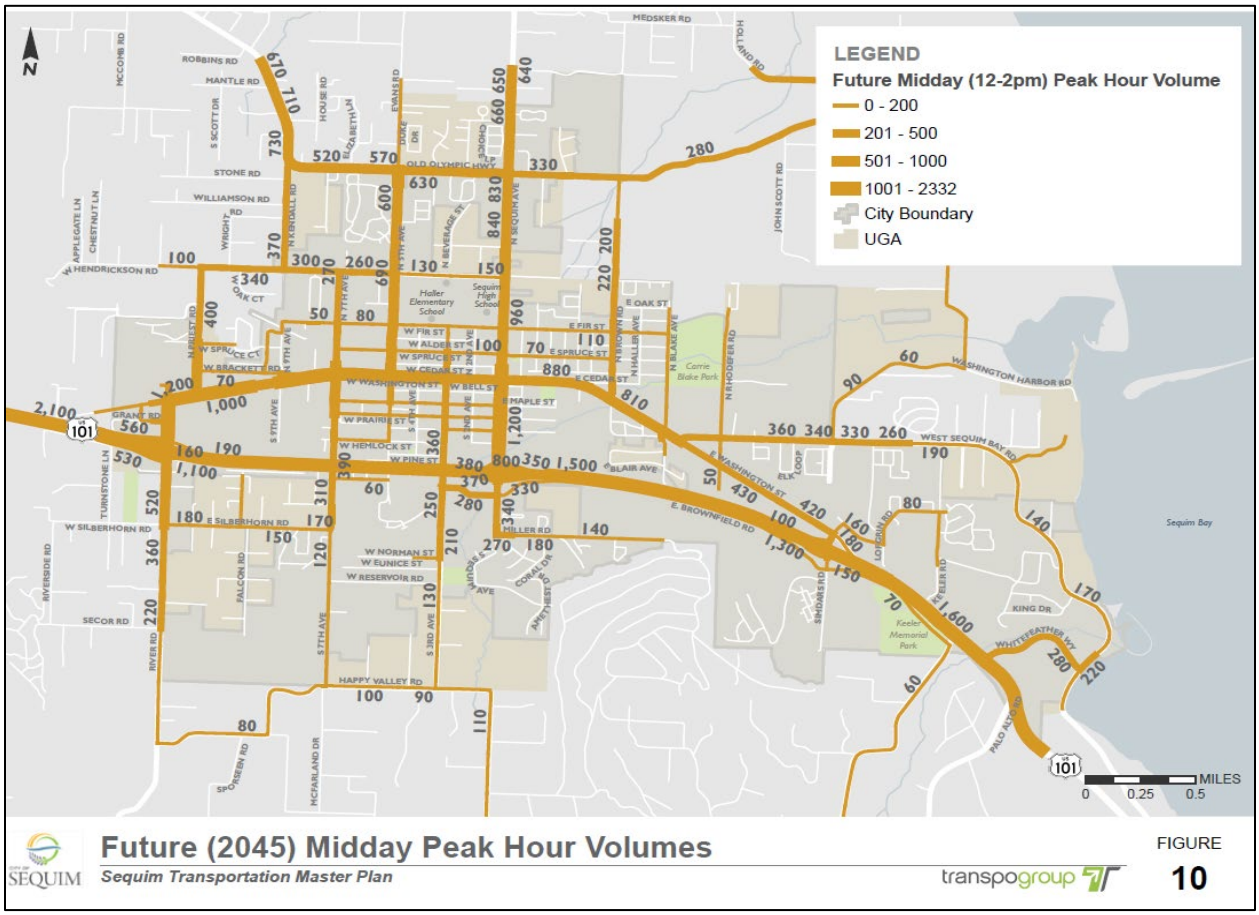
In the No Action Alternative, Sequim would continue to develop per the 2015 Comprehensive Plan and associated planned capital improvements. The current roadway system and active transportation network is disconnected, lacks effective multi-modal movement through the city, and does not respond adequately to active transportation requirements of GMA as required in HB 1181.

Action Alternative

Vehicular LOS

The City's travel demand model was used to develop traffic forecasts along the roadway network based on future population, housing and employment growth assumptions consistent with the Comprehensive Plan's Land Use Element. The 2045 forecasts were used to analyze future weekday midday traffic operations at intersections using the HCM methodology. Results for the future operations analysis are depicted in Figure 3.2.4-8.

Figure 3.2.4-10 Future 2045 Midday Peak Hour Volumes



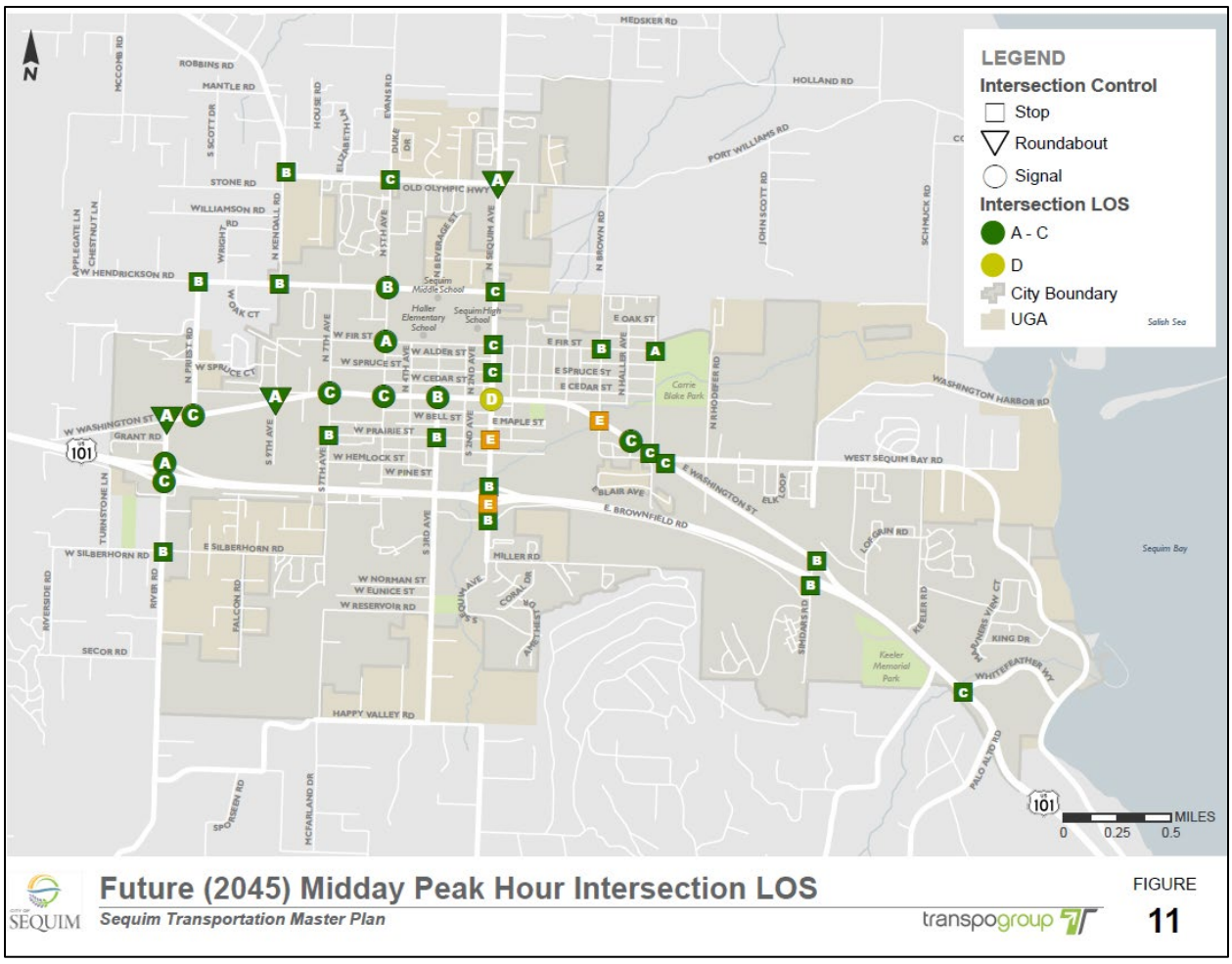
Source: 2026 Sequim Transportation Master Plan

Sequim's current LOS standard is LOS D or better, except along Washington Street which applies a LOS E standard outside of Downtown and a LOS F standard within Downtown, and WSDOT applies a LOS D or better standard along US-101 within the city.

As shown in Figure 3.2.4-9, the following intersections are forecast to operate below the applicable (City or WSDOT) LOS standards, when compared to existing intersection conditions:

- Brown Rd/Washington St
- Sequim Ave/Prairie St
- S Sequim Ave/US-101 EB Ramps

Figure 3.2.4-11 Future 2045 Midday Peak Hour Intersection LOS



Source: 2026 Sequim Transportation Master Plan

Active Transportation LOS

The TMP establishes a pedestrian LOS standard of LTS 1 or 2 for pedestrian system plan network roadways and LTS 1 for the Olympic Discovery Trail. Similarly, an LTS of 1 or 2 or roadways identified in the bicycle system plan network and LTS 1 for the Olympic Discovery Trail is also set for the bicycle network.

As identified in Figures 3.2.4-5 and -6 above, several streets do not currently meet the LOS for pedestrian and/or bicycles facilities, with the following sections of road reaching an LOS of LTS 4:

- Old Olympic Highway between N 5th Avenue and N Sequim Avenue
- West Sequim Bay Road between E Washington Street and Keeler Road
- Whitefeather Way between the Olympic Discovery Trail and W Sequim Bay Road

3.2.4.3.3 Summary of Impacts

Under both alternatives, additional growth and development will occur over time, resulting in increased demand on the City's transportation network. Under both Alternatives, impacts are anticipated to the intersection transportation system as the anticipated growth in both scenarios will cause three intersections to fail meeting the City's established LOS.

Under the No Action Alternative, impacts would occur to the active transportation network as none of the improvements identified in the 2025 Comprehensive Plan to increase connectivity of both vehicles and active transportation networks would occur. The Action Alternative has identified roadway improvements to mitigate failing intersection LOS impacts, including multi-modal transportation analysis and improvement projects.

Threshold	No Action Alternative	Proposed Action Alternative
Negatively impacts several intersection LOS	+	✕
Negatively impacts Active Transportation Facilities LOS	+	✕
Negatively impacts transit system ridership	✕	✕

Table Key:
✕ No or Low Potential for Adverse Impact
\+ Moderate Potential for Adverse Impact
\+ High Potential for Adverse Impact

3.2.4.4 Mitigation Measures

Comprehensive Plan

The Action Alternative 2025 Comprehensive Plan Transportation and Appendix B-2 Transportation Master Plan include numerous goals and policies and required analysis that meet the legislative amendments to GMA and the periodic update requirements for transportation, including required updates on active transportation.

Transportation Facilities Improvements

The City regularly plans for and adapts to changing growth patterns to ensure adequate and reliable transportation facilities long term. Existing policies, regulations, and commitments to mitigate potential adverse impacts to transportation facilities would continue to apply under both alternatives. The GMA requires adequate transportation facilities to be available or available within six years of development.

The City's Transportation Master Plan was updated concurrently with 2025 Comprehensive Plan periodic update and have utilized the population and jobs growth projections in demand modeling. Capital improvement projects have been identified for the 20-year planning period and included in the comprehensive plan's capital facilities section. Based on

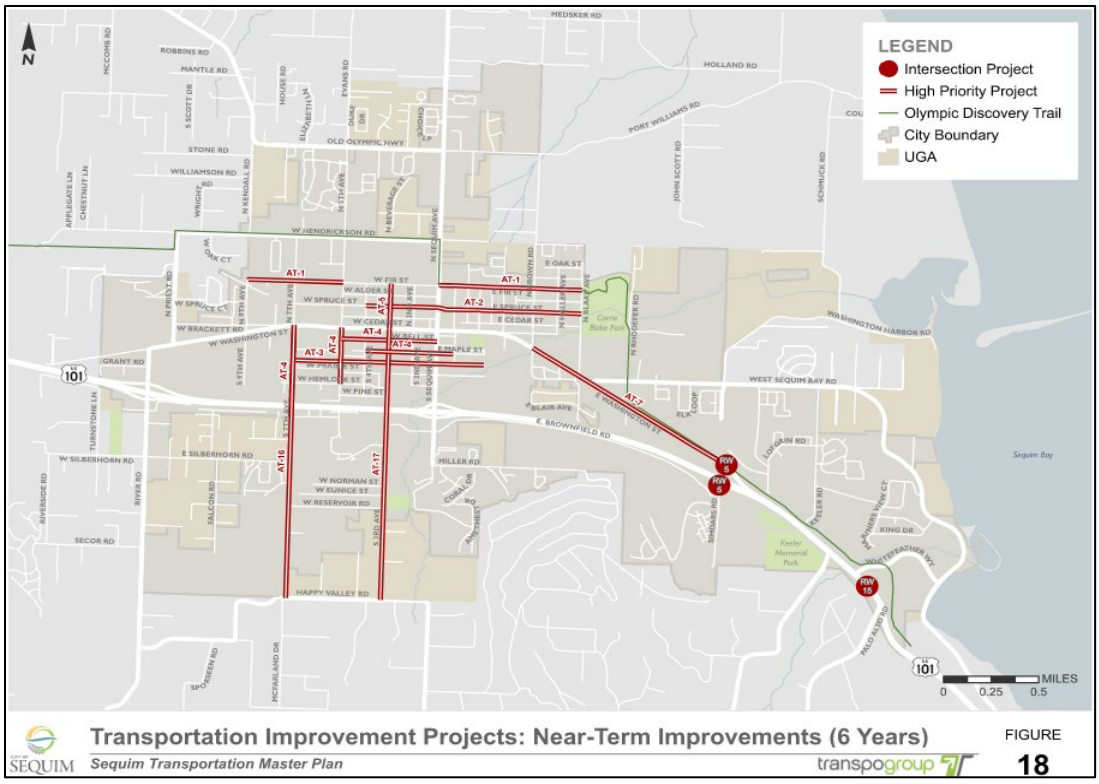
the multimodal LOS analysis and project prioritization, a near-term project list was developed. The majority of the near-term expenditures include bicycle and pedestrian projects to meet the adopted LTS standards and support the vision for a well-connected active transportation network. The following summarizes the transportation improvement program; the Transportation Master Plan (Appendix B-2 of the Comprehensive Plan) provides substantial detail on the planned capital project improvements.

Table 3.2.4-3: Summary of Six-Year Projects

Type	Notes	Number of Projects	6 Year Cost (thousands)
Active Transportation Projects	Bicycle Facilities (multi-use paths, bike lanes, and sharrows) and Pedestrian Facilities (sidewalk infill, and paths)	8	$24,480
Roadway & Intersections Projects	City Projects – Intersection/Corridor Improvement Projects along City roads	0	-
	WSDOT Projects – Intersection/Corridor Improvement Projects along WSDOT facilities	2	$17,170
Total	**-**	**10**	**$41,650**

Source: 2026 Sequim Transportation Master Plan

Figure 3.2.4-12 Near-Term (6 Years) Transportation Improvement Projects



Source: 2026 Sequim Transportation Master Plan

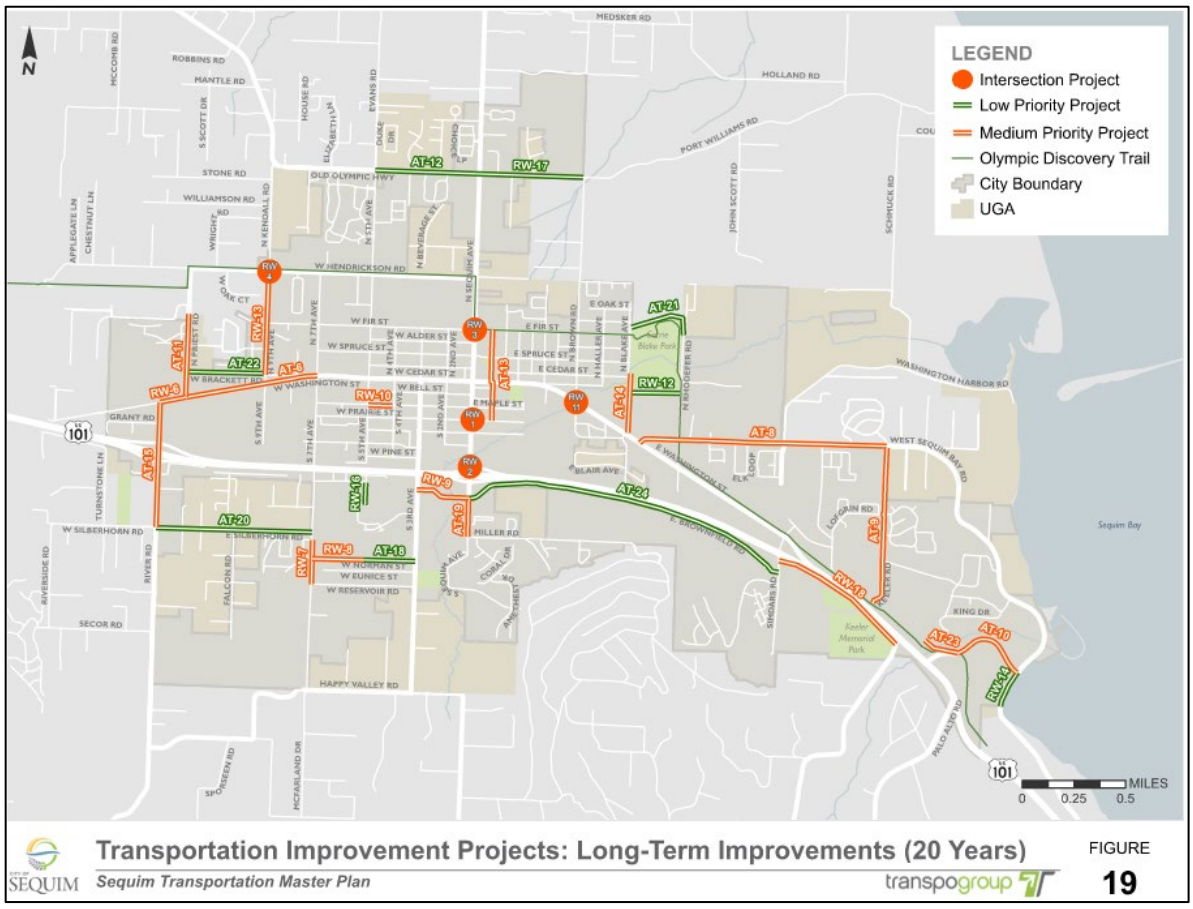
In addition to projects prioritized in the six-year list, the TMP resulted in an additional list of projects to be completed over the later portion of the planning horizon (years 7 through 20 of this plan).

Table 3.2.4-4: Summary of Twenty-Year Projects

Type	Notes	Number of Projects	6 Year Cost (thousands)
Active Transportation Projects	Bicycle Facilities (multi-use paths, bike lanes, and sharrows) and Pedestrian Facilities (sidewalk infill, and paths)	16	$27,470
Roadway & Intersections Projects	City Projects – Intersection/Corridor Improvement Projects along City roads	14	$22,800
	WSDOT Projects – Intersection/Corridor Improvement Projects along WSDOT facilities	2	$11,600
Total	**-**	**32**	**$61,870**

Source: 2026 Sequim Transportation Master Plan

Figure 3.2.4-13 Long-Term (20 Years) Transportation Improvement Projects



Source: 2026 Sequim Transportation Master Plan

Additional Measures Mitigating Transportation Impacts

Other planning documents or implementation measures that mitigate the impact on transportation facilities:

- City of Sequim Transportation Mater Plan, 2026
- City's annual Transportation Improvement Program (TIP)
- City's 6-year Capital Improvement Plan (CIP) w/City budget
- Continue to require developer funded street improvements and new roadway construction consistent with City Street Standards
- ADA Transition Plan
- City Safety Plan
- Traffic Impact Fees
- Traffic Impact Analysis (TIA) required with project development review
- Transportation Demand Management strategies
- Pavement Management
- Continue City participation in the regional transportation planning process through Peninsula Transportation Planning Organization
- Continue to coordinate with WSDOT
- Maintain the City's concurrency management system to ensure that adequate transportation facilities are available to serve new development
- Continue to utilize the travel demand forecasting model developed as part of the 2026 Transportation Master Plan to anticipate future growth so transportation facilities can be programmed prioritized
- Partner with Clallam Transit to support multi-modal and public transportation opportunities throughout the city
- Seek available transportation grant funding, collect impact fees, and identify new funding sources to support identified necessary transportation system improvements
- Relax transportation level of service standards

3.2.4.5 Significant Unavoidable Adverse Impacts

The implementation of both alternatives will result in increased vehicle traffic within the city. The severity of impacts for the Action Alternative will be mitigated through a combination of policy, programmatic, developer improvements and city-initiated improvements through capital facilities planning as identified and prioritized in the 2026 Transportation Master Plan, the City's Transportation Improvement Plan (TIP) and transportation impact fees. Significant and unavoidable adverse impacts are expected under the No Action Alternative, as the No Action Alternative does not meet the active transportation requirements of and is inconsistent with the Growth Management Act, as amended. Such inconsistency would be avoided through the Action Alternative.

3.2.5 Public Services and Utilities

3.2.5.1 Affected Environment

The City of Sequim provides an array of urban services to accommodate the City's population, jobs, and visitors, including water, sanitary sewer, and stormwater management, in addition to government administrative offices, maintenance facilities, police station, and park facilities. Other services available in the City are managed by other public agencies and/or private companies, such as electricity, telecommunications, and solid waste services; fire and emergency services; hospitals; and schools. All of these services are needed to properly accommodate current and future growth within the City.

Public Services

This section describes current conditions and evaluates changes in demand for public services including police, parks, fire and emergency services, and schools.

Police

The Sequim Police Department is charged with a variety of duties relating to the protection and safety of the community. This mandate is carried out through the enforcement of criminal and traffic laws, the investigation of criminal activities and the arrest of offenders, and by ordinance, emergency management and preparation. The Department coordinates investigations and law enforcement operations with other jurisdictions and agencies.

The Sequim Police Department consists of one chief, one deputy chief, 5 sergeants, 12 commissioned officers, 2 detectives, 1 school resource office, 1 code compliance officer, 1 support services supervisor, 3 administrative specialists, and 1 emergency management coordinator. Operations include patrol and 911 response, training, crime prevention, crisis response, K-9 unit, and investigation.

The department's administrative support offers weapons permitting and transfers, fingerprinting, records retrieval, incident reports, vacation check requests, evidence and property management, and public records requests.

The department is also supported by volunteers, who provide hundreds of volunteer hours to the city each year. Services include several security watch programs, search and rescue services, child car seat safety program, and chaplain services.

The Police Department is supported by thirty-four police vehicles, two box vans, three trailers, and one armored vehicle. In 2025, the Sequim Police Department managed 13,216 calls for service and 1105 case reports.

Parks

The City of Sequim owns 13 parks ranging in size from .03 acres to over 42.98 acres. These parks are classified into six categories based on their characteristics and recreational offerings. Collectively, they provide a range of outdoor recreation facilities, including

playgrounds, picnic areas, athletic facilities, ponds, an event space/amphitheater, walking/hiking trails, restrooms, off-leash dog park, gardens, and natural open spaces.

- Community Parks: four community parks consisting of 110.62 acres
- Neighborhood Parks: three neighborhood parks consisting of 8.38 acres
- Commercial Parks and Plazas: five parks consisting of 4.36 acres
- Natural Areas: one area consisting of 1.08 acres
- Pathways and Bikeways: total 7 miles of trails

Fire and Emergency Medical Services

Fire protection and emergency medical services within the City of Sequim are provided by Clallam County Fire District No. 3 (CCFD3). The Fire District serves Sequim and surrounding unincorporated areas of Clallam and Jefferson counties across approximately 142 square miles and an estimated population of 40,000. In 2025, the Fire District responded to 9,824 requests for service (an increase of 7 percent from 2024), of which 82 percent were EMS-related, approximately 2 percent were fire-related and remaining calls being service or good intent calls.

CCFD3 operates from six fire stations, with three staffed 24 hours per day by career personnel supplemented by volunteers and three staffed by on-call volunteers.

Located within the city limits of Sequim is Station 34, located at 323 North Sequim Avenue, functions as the District's headquarters station and a primary emergency response facility for the City of Sequim. The station includes administrative space, training space, emergency communications capability, and living quarters for on-duty personnel. The station is staffed 24 hours/7 days with six on-duty including a Battalion chief and supported by on-call volunteers. Apparatus assigned to Station 34 include Medic 34, Medic 34A, Rescue 34, Engine 34, Ladder 34, Tender 34, and Brush 34 during wildfire season.

School

The Sequim School district provides public education and operates two elementary schools, two alternative learning experience schools, one middle school and one high school that serves the city and surrounding area.

Utilities

Water

The City of Sequim Water Utility provides potable water within the city limits to approximately 8,400 people. The City's service area expands beyond the city limits and includes the UGA and adjacent areas where ethe City may provide service in the future if the UGA is expanded. A complete inventory, analysis of need, identification of deficiencies, and the capital facilities program is provided in the 2023 Water System Plan (WSP), adopted by resolution R23-018 and is available on the City's website.

The City's water system consists of two well fields and an Infiltration Gallery. There are three storage reservoirs totaling 2.9 million gallons of active storage, four booster pump stations and approximately 77 miles of distribution and transmission main piping. The City has six pressure zones. The City's water service area is identified in the 2023 Water System Plan Map Figure 1-2. An average of 73 water service connections were added to the City's water system annually from 2013 through 2021.

The City's water consumption has been generally steady since 2013. In the 2014 Water System Plan, the City used on average 163 gpd/ERU and currently uses 146 gpd/ERU based on the 2023 Water System Plan data collected from records provided from the City's billing system. This decrease in water usage has occurred due to a combination of increased efficiency, building code changes, education, and lowering the distribution system leakage.

Sanitary Sewer

The City of Sequim's sanitary sewer utility provides sanitary sewer service within most of the City limits and the surrounding Urban Growth Area (UGA). Sanitary sewer service is also provided to an unincorporated area of Bell Hill to the south of the City and several customers to the southeast of the City (Sequim Bay Lodge, Sequim Bay State Park, and the Jamestown S'Klallam Tribe). In addition, the City provides conveyance and transmission of sanitary sewer from the Carlsborg area to the west of the city limits.

The sewer collection system owned by the City contains approximately 71.8 miles of gravity mains, 4 lift stations, and 6.5 miles of force mains that convey wastewater to the City's Water Reclamation Facility (WRF). The WRF treats wastewater to produce Class A reclaimed water that is either used by the City for approved uses or discharged via an outfall in Strait of Juan de Fuca.

Stormwater

Surface water management within the city limits includes development and maintenance of stormwater collection and treatment system. The City's 2016 Storm and Surface Water Master Plan (SSWMP) available on the City's website, and includes identification of, and proposed solutions to, drainage and water quality issues, including capital facilities improvements.

The City's physical stormwater system is composed primarily of gravity-assisted open ditches, pipes, culverts and drywells/perforated pipes receiving runoff through catch basins and inlets from streets, alleys, parks, parking lots and buildings. This system conveys it to drainage features such as infiltration systems, stormwater ponds, and creeks which eventually discharge to Sequim Bay or ground water. Water quality treatment and water quantity detention/retention structures are throughout the system, many of which are privately owned and maintained. In areas of potential concentrated pollutants, water quality filters that can remove pollutants are required before infiltration or discharge.

Stormwater generated from public facilities is managed by the Public Works Department, including capital improvement activities, and operation and maintenance.

Energy

Clallam County Public Utility District No. 1 (Clallam PUD) provides electrical services. Clallam PUD is a publicly owned, non-profit utility that serves the majority of Clallam County with electric power. The utility purchases wholesale electricity primarily from the Bonneville Power Administration (BPA), which generates power from federal hydroelectric dams on the Columbia River. This makes the electricity supplied to Sequim residents and businesses largely renewable, reliable, and relatively low in carbon emissions.

Telecommunications

Telecommunications include but are not limited to, telephone, personal wireless services, cable, broadband, and fiber optic. Telecommunications services are provided by private companies, and their infrastructure is located throughout the city and includes lines, poles, cables, antennas, towers, and system hubs. In most cases, these telecommunication services will use existing utility corridors, public rights-of-way, and City-owned properties other than rights-of-way, and will be able to provide services to all parts of the city.

Telephone service in the City of Sequim is primarily provided by the incumbent local exchange carriers (ILEC), which offers both traditional landline service and Voice over Internet Protocol (VoIP) through digital subscriber line (DSL) and fiber internet networks. The ILEC maintains the region's telephone infrastructure, including lines, switching equipment, and customer service operations.

Personal wireless facility communication services use radio waves to transmit voice and/or data using the radio frequency spectrum. These services include, but are not limited to, commercial mobile services (e.g., cellular), unlicensed wireless services, and common carrier wireless exchange services.

Cable television and broadband services in the City of Sequim are primarily provided by regional cable and internet providers, including Verizon, Century Link, Astound Broadband, Viasat Inc., over a hybrid fiber-coaxial (HFC) network. This system uses fiber optic lines for high-capacity data transmission between central facilities and neighborhood nodes, with coaxial cables delivering the final connection to individual homes and businesses

Solid Waste

The City of Sequim currently relies on contracts with public and private entities to provide collection, transfer, processing or disposal of solid waste and recycling. This includes residential and commercial solid waste collection services to approximately 3,241 residential and commercial utility customers within the city limits. Residential services include weekly and bi-weekly pickup of containers ranging in size from 35 to 96 gallons. Commercial services also offer dumpsters ranging in size from 2 to 30 yards with frequency of pickup subject to the property or business owner's disposal needs.

Recycling services include bi-weekly curbside collection of recyclables and yard waste, and commercial cardboard collection. It also includes publicly accessible drop boxes for drop-off glass recycling.

The City has an Interlocal Agreement with the City of Port Angeles and Clallam County for transfer and disposal of solid waste brought by the City's contracted hauler or self-hauled by city residents to two transfer stations operated by the City of Port Angeles. Curbside collection of solid waste is transported to the Regional Transfer Station (RTS) located in Port Angeles, where it is consolidated and exported to an out-of-area landfill. Exhibit CFP-18 depicts the amount of solid waste delivered to the RTS in recent years from Sequim collections.

3.2.5.2 Impacts

Public Services

Under both alternatives, increased population, housing and employment growth in the city could generate additional demand for emergency services, parks, and schools.

- *Police*. Both alternatives could increase the demand for police service. Employment and retail centers as well as major transportation corridors would likely continue to have higher calls for service under both alternatives. Retail areas may see more theft and other employment types may see other types of crime.
- *Parks*. Growth and development under both alternatives would likely result in increased demand for additional access to park and recreation facilities. Based on the City's adopted LOS standards compared to the Action Alternative's 2045 population growth target of approximately 3000 new persons, 5.35 acres of additional neighborhood parkland is anticipated.

Table 3.2.5-1 Park Acreages, Level of Service and Projected Need

Park Type	Existing Acres	2025 Existing Level of Service, Acres per 1,000 population	Planned Level of Service (PLOS)	2045 Acreage Need Based on PLOS	2045 Park Acreage Needs
Community Parks	110.62	13.79 ac/1000	7.50 ac/1000	82.37	
Neighborhood Parks	8.38	1.04 ac/1000	1.25 ac/1000	13.73	5.35
Commercial Parks & Plazas	4.36	0.54 ac/1000	0.25 ac/1000	2.75	
Natural Areas	1.08	0.13 ac/1000	None established in Park Master Plan		
Total	124.44		9.00 ac/1000	98.85	
Trails (miles)	7.00 miles	0.87 miles/1000	0.25 miles/1000	2.75	

- *Fire/EMS.* Growth and development would create more demand for fire and emergency medical services and place additional pressure on the Clallam County Fire District #3 (CCFD3) to meet response time standards under both alternatives. Emergency medical services typically generate the highest demand for CCFD3. The number and type of service calls under both alternatives would depend on demographic factors such as age of new residents, prevalence of multifamily dwellings with new fire-suppressions systems, and the ongoing efforts for fire prevention education and outreach.
- *Schools.* The population growth that will occur under both alternatives is projected to minimally increase demand of school services due to declining birth rates.

Utilities

Under both alternatives, increased population, housing and employment growth in the city would generate additional demand for utilities. Modeling, capacity and improvements were completed for water and sewer using the Action Alternative growth allocations by average annual growth rate or growth assignment by area. The analyses for the utilities are included in 2025 Comprehensive Plan Appendix B-1 Capital Facilities Plan and are summarized below.

Water

By 2041 the total annual water use is projected to reach 1,742 acre-feet/year, representing an 81 percent increase from current usage of 963 acre-feet/year. The projection is based on an assumed average annual growth rate of 3%, as identified in the WSP. This growth rate is intentionally more conservative than the Action Alternative (2025 Comprehensive Plan) average annual growth rate of 1.3%. The City holds confirmed water rights for a total of 1,850 acre-feet/year. Therefore, the average annual growth rate assumed in the water forecast model exceeds the projected growth for 2045 and takes a proactive and conservative approach to long-range water supply planning, ensuring adequate capacity to accommodate future growth.

Sanitary Sewer

The projected sewer flow and loading were developed by estimating a baseline of dry-weather residential flows to the WRF and dry-weather residential per capita flow. Dry-weather flows are used as the basis for projections to exclude the influence of inflow and infiltration (I/I). The estimated dry-weather per capita flow was used for all existing residents served, and additional residents to be served were assigned a greater per capita flow value for conservatism. For each year, the per capita flow value was multiplied by the 2045 population projection assigned to Sequim to determine the projected baseline residential flow. Overall, the City sewer system operates satisfactorily for the 20-year planning period. Deficiency in gravity sewer capacity and pump station capacity were identified and are addressed by improvements included in the sewer capital facilities improvements projects.

Stormwater

Future growth and development under both alternatives would result in increased impervious surfaces, which can increase stormwater runoff volumes, alter natural drainage patterns, and contribute additional pollutants to receiving waters if not appropriately managed. As development occurs, additional stormwater facilities and improvements may be needed to maintain existing levels of service, address localized drainage concerns, and comply with applicable stormwater management requirements. Because growth is directed to urban areas where development regulations require stormwater controls, impacts associated with increased runoff are expected to be manageable through implementation of the City's stormwater program and applicable development standards. The Proposed Action Alternative may provide additional consistency with current stormwater management practices by incorporating updated land use policies and development regulations that support low-impact development, protection of natural drainage functions, and reduction of adverse impacts to surface water resources.

Non-City Controlled Utilities and Services

Impacts to utilities and services not operated by the City, such as energy, telecommunication, and solid waste are anticipated to be minimal overall. Companies and organizations that control these services have long-term strategic plans that consider growth projects for the larger area in which they serve. These plans generally indicate sufficient capacity to serve future growth in the area, though may include planned expansions and replacements in this assessment.

3.2.5.2.1 Summary of Impacts

The Action Alternative includes Capital Facilities Plan with LOS analysis, 20-year project list and prioritized by budget 6-year CIP. The No-Action Alternative would result in moderate impact as it would not include the updates capital facilities planning since 2015, including project improvement lists.

Threshold	No Action Alternative	Proposed Action Alternative
Police	⊗	⊗
Parks	⊕	⊗
Fire/EMS	⊕	⊗
Schools	⊗	⊗
Water	⊕	⊗
Sanitary Sewer	⊕	⊗
Stormwater	⊕	⊗
Solid Waste	⊗	⊗

Electricity	✕	✕
Telecommunications	✕	✕

Table Key:
✕ No or Low Potential for Adverse Impact
+ Moderate Potential for Adverse Impact
+ High Potential for Adverse Impact

3.2.5.3 Mitigation Measures

Comprehensive Plan
The Action Alternative 2025 Comprehensive Plan Capital Facilities and Utilities Chapter, Appendix B-1 Capital Facilities Plan and Appendix B-1A Sanitary Sewer Capacity Memo include numerous goals and policies and required analysis that meet the periodic update requirements for public services and utilities by using the GMA population allocation for future need forecasting.

Capital Facilities Planning
The City regularly plans for and adapts to changing growth patterns to ensure adequate and reliable parks and utility services long term. Updated policies, regulations, and commitments to mitigate potential adverse impacts to parks, water, wastewater, and stormwater would apply under the Action Alternative. The GMA requires cities to plan its utilities to be available to serve its projected growth. The regulatory framework is designed to avoid the situation where utilities become overextended and are not available to meet the demands of growth; it is one of the significant underpinnings of the Growth Management Act.

The improvements identified in the 2025 Draft Comprehensive Plan's Capital Facility Plan (Appendix B-1) are expected to mitigate the impacts of future development and the corresponding increased demand for public facilities and services. The identified capital improvement projects are listed as a 20-year list of projects, with a 6-year CIP serving as short-term budgetary focus for implementing the CFP. These identified capital improvements mitigate the impact of the Action Alternative:

Parks
The Sequim Parks and Open Space Master Plan (2023) and the Comprehensive Plan's Capital Facilities Plan Park Section, include park development projects and land acquisition that are intended to meet the level of service standard and community demand.

Table 3.2.5-2 Sequim Parks Improvement Plan	
Parks System	
Land Acquisition	**Capital Improvement**
City Wide Park Land, Trail, Riparian Acquisition	Secure property or ROW for future neighborhood park, park improvements/development in accordance with City's Comprehensive Plan and Park Master Plan.
Park Development	**Capital Improvement**
Playground Equipment Upgrade - Margaret Kirner	Replacement of playground equipment with a universally accessible inclusive playground design with ADA compliant fall surfaces at Margaret Kirner Park
McCord Park Master Plan	Develop master plan for Ruth C McCord Memorial Park to designate the use of the space and maximize its public value
Pickleball Court Resurfacing	Resurfacing pickleball courts in Carrie Blake Park
Keeler Park Pedestrian Boardwalk Development	Non-motorized route in Keeler Park. The route will be identified through a park master planning process.
Carrie Blake Park Tennis Courts Development	Construct tennis courts
Reuse Demo Parking Lot Rehabilitation	Pave the parking area and widen the access at N Rhodefer Rd to allow two-way traffic to enter and exit from the parking area.
Carrie Blake Park Vehicular Circle Development	Extend existing roadway that runs along the park south boundary east to North Rhodefer Road. Add a traffic circle at the park entrance and a new park access roadway that extends north between the softball fields and restroom building
Carrie Blake Park Skate/BMX Track Development	Upgrade Carrie Blake Park Skate Park component and construction a BMX track
Pioneer Park Parking Loop Construction	Create a paved parking loop in Pioneer Park
Re-use Water Demonstration site Restroom with Plaza	Construct Plaza to include site furnishings and picnic shelter at the Reuse Water Demonstration site.
Splash Pad	Add a splash pad to expand recreational opportunities
Centennial Place Construction	Develop Centennial Place Park at the intersection of Washington St and Sequim Ave.
Playground Equipment Upgrade - Carrie Blake Park	Replacement of playground equipment with a universally accessible inclusive playground design with ADA compliant fall surfaces at Carrie Blake Park

Water

Water system capital facility improvements have been evaluated, identified and prioritized on the basis of water quality concerns, growth demands, regulatory requirements, component reliability, system benefit, and financial priority. As identified above, there is confirmed water rights to meet the Action Alternative growth allocations. The Water System Improvement Plan below is included in the 2025 Comprehensive Plan's Capital Facilities Plan (Appendix B-1) and represents projects for water quality, regulatory requirements, growth demands, component reliability, and system benefits.

Table 3.2.5-3 Sequim Water System Improvement Plan	
Reservoir Rd water main and booster station	Construct a new booster pump station (located at the City-owned Reservoir Road property) that will be capable of providing flow and pressure for build-out of the southwestern portion of the City in areas that are high enough in elevation that they cannot be served by either the 420 or 480 pressure zones. The ultimate build-out area for the proposed booster station is shown in Appendix L in Figure L-1 of the WSP. Distribution piping projects (including some PRVs) will be needed to connect this new booster pump station to the areas shown, and these piping projects will be driven by development schedules. One exception is project D-21, which will allow the booster pump station to provide service to the Emerald Highlands area, which is an existing development current served by the PUD but is within City limits. The booster station will pull water from the 420 pressure zone and discharge to a new pressure zone with a Hydraulic Grade Line of approximately 635 ft to provide both residential fire flow and peak hour demand for build-out of the service area following applicable standards for redundancy and resiliency.
Simdars Rd Booster Station Construction	This project will provide the city with additional capacity to transfer water from the Port Williams Wellfield in the 350 Zone into the 420 Zone. This project would be located near the PRV station located adjacent to Simdars Road. The proposed Simdars Road Booster Station would have a reliable capacity of 600 gpm with three pitless booster pumps with capacities of 300 gpm each. The booster station would provide redundant supply to the Solana area, which is currently served by a single line along Brownfield Road. This project would also improve water quality in the Solana Reservoir by allowing the City to deliver water more directly from the Port Williams Wellfield.
Hammond St Water Main Installation	Provide fire flow and improve east-west transmission in the system. The construction will consist of approximately 2,800 LF of 12-inch water main along East Hammond Street from South Sequim Avenue to South Brown Road. It is anticipated that this project will be developer funded.
Brown Rd Water Main Construction, Port Williams Rd to E Fir St	Provide additional capacity for the system to serve the east portion of the service area and provide additional transmission capacity to the system from the Port Williams Wellfield. The construction will consist of approximately 2,600 LF of 12-inch water main along Brown Road from Port Williams Road to Hendrickson Road.
Washington St Water Main Construction, West Sequim Bay Rd to E Washington St	Water main construction will consist of approximately 2,500 LF of 12-inch water main from West Sequim Bay Road south to the existing water mains on Washington Street. It is anticipated that this project will be developer funded.
Water Main Installation, Lofgren Rd to Keeler Rd	Construction to install 1,350 LF of 12-inch diameter CVP water main piping east along Washington Harbor Loop from Lofgren Road to Keeler Road, connecting to an existing main along Washington Harbor Loop owned by the Sequim Bay Resort and Marina Water System. This project is contingent on development in this area and will be a developer-funded extension.
Brown Rd Water Main Installation, E Fir St to E Washington St	Improve fire flow to commercial developments in the city center. Construction will consist of approximately 1,800 LF of 12-inch water main along Brown Road from East Fir Street to East Washington Street. It is anticipated that this project will be developer funded.

Water System PRV Purchase & Install	Construct pressure relief valve stations in the 500 Zone, 420 Zone and in the 350 Zone to provide protection from overpressure if a PRV from an upper zone is stuck open. Exact locations of these stations will be determined during design.
South Lee Chatsfield Rd Water Main Loop	Construct approximately 500 LF of 8-inch water line to connect South Lee Chatfield Avenue to Espeth Way to provide additional looping to that area. It is anticipated that this project will be developer funded.
AC/Galv Iron Main Replacement	Annual allotment to replace undersized or failing AC and galvanized water mains throughout the distribution system with more durable and appropriately sized piping.
W Washington St Isolation Valves Upgrade	Add isolation valves to three intersections along Washington Street, four-way valve clusters to 2nd Avenue, and 8-inch valves on the North/South pipes to allow future upsizing of 6-inch mains. The project will add valves to the North & East legs at 5th Avenue, and the south leg of 3rd Avenue. These isolation valves will reduce the number of blocks that will need shutdown to isolate the subject sections of pipe.
West Prairie Water Main Installation, S Sequim Ave to S 5th Ave	Replace an undersized line along West Prairie Street. Construction will consist of approximately 2,650 LF of 8-inch water main along West Prairie Street from South Sequim Avenue to South 5th Avenue.
Port Williams Well #4 Construction	Drill and develop a fourth well at the Port Williams Well Field.
Silberhorn Deep Well No. 4 Construction	Drill and develop an additional well within the water system. The anticipated location of the well is in the vicinity of the Silberhorn Wellfield, although it is planned to be developed in the deepest aquifer in this area, roughly 600-700 feet deep.
Happy Valley Reservoir Construction	Existing service area capacity upgrade from 1.7MG to 4.2MG at Reservoir Rd site. Would serve 480 with booster station as well as other areas. The new reservoir would provide adequate pressure, fire flow to this area and additional storage.
Ranney Well Water Main Replacement, Ranney Well to Reservoirs	Rehabilitation or replacement of approximately 3 miles of existing 12" diameter AC water main from the Infiltration Gallery (Ranney Well) to the reservoirs on Reservoir Rd. A trenchless method is anticipated, either Cured-In-Place-Pipe (CIPP), slip lining, or pipe bursting.
SCADA Installation, Water Division	SCADA/telemetry system improvements, connecting numerous remote Public Works sites to a central location where an operator will be able to observe, record, and change process control parameters at the remote site.
Dungeness River Surface Water Treatment Facility	To fully utilize the City's Dungeness River water right, a new surface water treatment facility will be needed to treat raw river water. The facility is anticipated to be constructed on the City's Reservoir Road property and designed to utilize the full surface water right. Backwash may be discharged to the City's sewer system for treatment and reuse, reducing the need for on-site solids handling.
Infiltration Gallery Flow Control Valve	This project will add flow control valve in new vault for automatic and remote control of infiltration gallery flow rate for the Infiltration Gallery.
Water line on S 5th Ave, McCurdy Rd & Reservoir Rd	Construct approximately 650 LF of 8-inch water main along 5th Avenue from West Reservoir Road to West Norman Street to provide water looping and fire flow.

Norman St Water Main Construction	Construct approximately 1800 LF of 8-inch water main along Norman Street to provide water looping and fire flow.
Eunice St Water Main Construction	Construct approximately 1800 LF of 8-inch water main along Eunice Street to provide water looping and fire flow.
Rolling Hills looping	Connect 7th Ave and Silberhorn Rd water mains.
Water line on Silberhorn Rd from River Rd to 7th Ave	Install approximately 1,350 LF of 12-inch water main along South 7th Avenue from Silberhorn Road to McCurdy Road Avenue to provide additional fire flow to the commercial areas of the 420 Zone north of Highway 101.
Land Purchase for future reservoir	Additional storage will be required at approximately the end of the 20-year planning period and the City plans to construct additional storage at least 5 years before it is needed. Additional future storage (2.5 MG) is at the City-owned property on Reservoir Road.
Marlo Dr Extension to River Rd, Water and Streets Project	Construct approximately 900 LF of 8-inch water main along Marlo Drive from the end of the existing main to River Road for water looping and fire flow. It is anticipated that this project will be developer funded.
W Maple St Extension from 4th Ave to 5th Ave, Water and Streets Project	Install approximately 780 LF 8" watermain to provide redundancy and looping for the system.
W Sequim Bay Corridor Improvements, Water and Sewer Project	Construct approximately 4,000 LF of 12-inch water main and 500 LF of 8-inch water main along West Sequim Bay Road from the Battelle Parcel to connect to existing Marina Water System Main. A 12-inch loop will be constructed through the Mariner's Outlook Subdivision and connect with an 8-inch extension from Water View Drive. The project will intertie with the Marina Water System and include a pressure reducing valve to supply the Marina System's lower zone. It is anticipated that this project will be developer funded.
S 3rd Ave Improvements, Washington St to Pine St, Water and Sewer Project	Replace approximately 2000 LF of existing 12" AC watermain from Washington St to Pine St, with a new 12" PVC watermain.
W Maple St Rehabilitation, 5th Ave to 7th Ave, Water and Streets Project	Replace approximately 700 LF (6th-7th) (or 1300 LF if 5th-7th) of existing 6" AC watermain with a new upsized 8" PVC watermain.
Bell St Rehabilitation, Sequim Ave to 2nd Ave, Water, Sewer, and Storm Water Project	Replace 8" waterline on Bell St between 2nd and 5th. This project is part of a larger project that replaces the sewer line and rehabilitates the street.
Flaura's Acres, Water, Sewer, Streets Project	Construct 3000 LF of water line at Flaura's Acres, Blair & Belfield off of Still Rd.

Sanitary Sewer

RH2 Engineering, Inc., (RH2) is in the process of updating the City's *General Sewer Plan* (GSP), which contains detailed sewer system description, flow and loading projections, collection and treatment system analysis, a Capital Improvement Plan, and a financial analysis. For purposes of the 2025 Comprehensive Plan Update, a technical memorandum was prepared by RH2 and is included as Appendix B-1A; this memo includes data on existing and projected

system flow and loading, existing and projected lift station capacity, existing and projected collection system flows, capital improvement projects, project list, figures and methodology. It is anticipated that upon completion of the GSP update, amendments to the Capital Facilities Plan will occur at the next appropriate annual comprehensive plan amendment cycle.

The RH2 Technical Memorandum to the General Sewer Plan included a 2045 capacity assessment of the City's system. Based on the analysis, pipe segments and pump stations in limited areas of the city are potentially deficient in the future, and several projects were added to the sanitary sewer capital improvement project list to remedy these capacity constraints.

Table 3.2.5-4 Sequim Sanitary System Improvement Plan	
WRF Improvements	
Aerobic Digester and Solids Handling Improvements	Increase capacity of WRF solids handling system
Collection System Improvements	
Upsize Grant Rd to W Washington St Gravity Main	Replacing under sized mains and manholes
Upsize W Hammond Gravity Main	Replacing under sized mains and manholes
Upsize Sewer Gravity Main near W Salal Place	Replacing under sized mains and manholes
Upsize Sewer Gravity Main Along N Blake Ave	Replacing under sized mains and manholes
Lift Station Improvements	
Forest Rd Lift Statin and Force Main	Construction of lift station at Forest Rd, including force main
North End/Port Williams Lift Station Improvements	Replace existing north end lift station at Port Williams Rd

Stormwater

The City's Storm and Surface Water Master Plan identify flow control and water quality treatment measures, including infiltration facilities, biofiltration swales, ponds, and other best management practices, as strategies to reduce potential impacts associated with increased urban development. A prioritized schedule of stormwater capital projects was developed and is included below.

Table 3.2.5-5 Sequim Stormwater System Improvement Plan	
Stormwater Management Projects	
S 3rd Ave Drainage Improvements	Install an 18-inch diameter culvert under the Hideaway Homes Park driveway and a catch basin at the discharge end of the culvert, tied to existing drainage pipes discharging to the large retention pond on the NE corner of S. 3rd Ave and W. Brownfield Rd.
Bell Creek Culvert Upgrade (RM 1.8)	Replacement of an existing 48 in. dia. culvert with a fish passable culvert to join the 11 in. by 6 in. box culvert (under Les Schwab driveway).
Bell Creek Culvert Under Blake Ave. and Rhodefer Rd. (RM 1.5)	Replaces most existing runoff from E Washington that directly discharges to Bell Creek with infiltration facilities installed under sidewalk on west side N Brown.
Discharge Retrofit, 7th Ave and Washington St	Installation of a biofiltration unit for treatment of runoff and protection of the infiltration facility, tie in of existing catch basis into the filtration unit, and installation of extended infiltration trench for infiltration runoff.
Sequim Area Stormwater Plan	Update Storm & Surface Water Plan, identify strategy to provide adequate surface water system capacity for growth. Include assessment of existing conditions & develop plan for maintaining/improving stormwater conveyance, infiltration, resource protection and financial analysis
Miller Rd Stormwater Improvements	Reroute stormwater to Emerald Highlands Detention Pond and make improvements.
Infiltration Facilities	Improve infiltration facilities throughout City

Regulations

- SMC Title 13 Public Services
- Washington State Water Pollution Control Act
- Washington State Drinking Water and Public Water System requirements
- Washington State Department of Ecology Stormwater Manual for Western Washington

Other Potential Mitigation Measures

- Replacement and maintenance of the City's police patrol equipment is through the City's general budget and not considered capital projects.
- The Clallam County Fire Protection District #3 2025–2035 Capital Improvement Plan concludes that the current station network provides general coverage but identifies exposure gaps and facility deficiencies that affect long-term service delivery. The

CCFD#3 CIP identifies a need for additional fire service capacity on the east and southeast side of Sequim city limits. A future station near Simdars Road and Highway 101 is identified as a strategic location to improve response overlap and reduce reliance on Station 34 for eastern service demand.

- Seek, authorize, collect and implement all funding sources available to it for the funding and implementation of its Capital Facility Plan. The City shall utilize a variety of revenue sources, including utility rates, connection charges, revenue bonds, grants, loans, impact fees, mitigation fees, voluntary contributions, provision of public facilities, and any other legally accepted sources.
- Continuing to update water, sewer, and stormwater system plans to ensure the short-term and long-term capacity needs of the city are being met, as well as applicable state agency requirements.
- For future proposed residential or commercial developments that currently do not have the City's utilities readily available, the City generally requires the developer or landowner to pay all costs associated with designing, engineering, and constructing the extension to City standards. The City also requires the developer/landowner to turn over and dedicate any capital facilities such as main lines, pump stations, and wells to the City, at no cost. The City anticipates this process will be used more often to serve development occurring throughout the underdeveloped areas of the city and the urban growth area.
- Review construction standards regularly to ensure the City's standards are current and relevant to the changing needs of the city.
- Develop and implement proactive water conservation and education programs.
- Continue inflow and infiltration evaluations of the City's sewer system.
- Incorporate LID standards and techniques for storm water management should be incorporated wherever possible to aid in the reduction of storm water impacts.
- To the extent that is financially possible, existing storm water systems should be retrofitted with Best Management Practices (BMPs) that reduce pollutant loading.
- Coordinate as appropriate with Non-City Managed Utilities to assist in their long-term strategic planning.

3.2.5.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts to utilities are anticipated because the Action Alternative updated utility planning and Capital Facilities Plan address the GMA periodic update growth allocations and identify the infrastructure improvements needed to serve future development. The No Action Alternative would result in adverse impacts by relying on outdated utility planning that does not reflect current growth projections and capital improvement needs.

3.2.6 Historic and Cultural Resources

3.2.6.1 Affected Environment

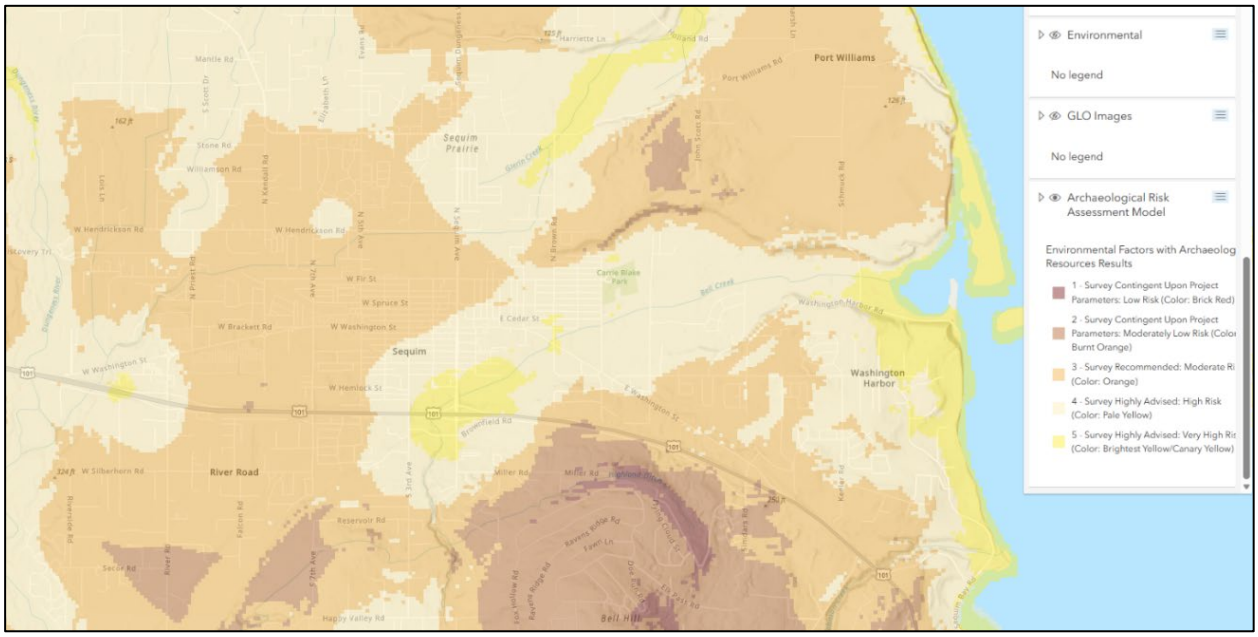
Historic and cultural resources in Sequim provide a tangible connection to the community's past and contribute to a sense of continuity and place. These resources reflect historic settlement patterns, agricultural and maritime history, and places associated with significant community development over time. Together with newer development patterns, these resources help define the character of Sequim and the surrounding Dungeness Valley. The identification and preservation of historic and cultural resources, including archaeological resources, supports the retention of community character and helps maintain connections to the area's cultural and historical heritage.

Tribal

Cultural resources have the potential to occur throughout the city. Sequim is located on the ancestral lands of the indigenous S'Klallam People. The Jamestown S'Klallam Tribe is actively engaged in the preservation of cultural resources and have identified and mapped traditional places in and around the Sequim Dungeness Valley. There are potentially significant historical/cultural resources throughout the city where the Tribe has a vested interest in protecting and preserving data about its heritage, culture, ancestors and lifeways. Early identification of these sites and resources provides the opportunity to protect them in advance of development, and reduces the potential for sudden, inadvertent, and haphazard discovery and recovery. It is in the interest of Tribal people, pioneers, city and rural dwellers alike, to recognize, understand, and protect the foundations of history upon which we all stand.

The Washington State Department of Archaeology and Historic Preservation (DAHP) works closely with the Jamestown S'Klallam Tribe to protect these cultural resources. DAHP maintains the Washington Information System for Architectural and Archaeological Records Data (WISAARD), which is the state's digital repository and data entry point for architectural and archaeological resources and related reports.

Figure 3.2.6-1 DAHP WISAARD Map of Sequim Area



Source: Washington State Department of Archaeology and Historic Preservation WISAARD

National

The National Historic Preservation Act of 1966 authorized the creation of the National Register of Historic Places (NRHP) and the National Historic Landmarks Program, which recognize sites, structures, districts, and objects associated with significant events, persons, architecture, and cultural heritage. The NRHP is administered by the National Park Service and provides recognition and limited protections for listed properties, particularly when federal funding or permits are involved. Listing on the NRHP is voluntary and does not, by itself, prevent alteration or demolition of a property.

The Sequim Opera House, located in downtown Sequim, is currently listed on the National Register of Historic Places. Constructed in 1907, the building served as a cultural and civic gathering place for the community and remains one of Sequim's most recognizable historic landmarks. Additional National Register-listed resources are located throughout the greater Sequim-Dungeness Valley and contribute to the area's rich historical and cultural heritage.

State

The Washington State Department of Archaeology and Historic Preservation (DAHP) serves as the State Historic Preservation Office (SHPO) pursuant to the National Historic Preservation Act of 1966. DAHP maintains inventories of historic, cultural, and archaeological resources throughout Washington State, administers the Washington Heritage Register as well as the Washington Heritage Barn Registry, and coordinates with local, state, tribal, and federal agencies on matters related to historic preservation. The agency also reviews federally

funded or permitted projects for potential impacts to historic and archaeological resources and provides technical assistance to local governments engaged in preservation planning.

The City of Sequim coordinates with DAHP to identify and protect historic, cultural, and archaeological resources within the community and surrounding region. Through inventory, planning, and project review processes, DAHP provides guidance that helps ensure historically significant resources are appropriately considered as the city grows and develops.

The Myron L. Spath Farm is registered on the Heritage Barn Registry. Constructed in 1932, the barn and farmhouse operated as a dairy farm until the 70's and then as a cattle farm. The barn still stands today and is more commonly known as the Cole Family Farm.

Local

The Sequim Museum & Arts serves as the primary local organization dedicated to preserving and interpreting the history, art, and cultural heritage of Sequim and the surrounding Dungeness Valley. Its mission is to collect, preserve, and display artifacts and information about human and natural history through a wide-ranging program of research, education, and exhibition. The museum is renowned for its local exhibitions and historical collections, which portray a panorama of the area's diverse economic, cultural, and social development. Public education and outreach are provided through rotating exhibits, research resources, lectures, school programs, and community events. The organization supports local heritage preservation and cultural awareness in coordination with regional partners and relevant state and local agencies.

3.2.6.2 Impacts

3.2.6.2.1 Impacts Common to Both Alternatives

Impacts to cultural resources under both alternatives would include projects or specific construction activities that may disturb or destroy undocumented archeological resources during construction activities. Future development projects would continue to be required to comply with federal, state, and local regulations to protect cultural and historic resources. Comprehensive plan goals and policies, applicable local, state, and federal regulations and historic preservation incentives encourage the protection, preservation, and enhancement of cultural resources. Other specific policies encourage identification and documentation of archaeological, historical, and cultural resources.

3.2.6.2.2 Impacts of No Action and Action Alternative

No Action Alternative

Under the No Action alternative, growth would occur in a similar pattern to what is already being experienced. The impacts created by projects could still cause disturbances to undocumented resources, or along the shoreline and water bodies.

Action Alternative
Proposed changes could see increased residential and commercial activity citywide in zones previously restricted to certain use types that have remained vacant, as well as an increase in housing stock throughout all zones that allow residential uses.

Summary of Impacts
Under both alternatives, additional growth and development will occur over time, resulting in land disturbance and alteration. The changes within the Proposed Action alternative could facilitate growth in areas that have remained undeveloped under the No Action alternative. With existing regulations and protocols, these impacts are considered minimal.

Threshold	No Action Alternative	Proposed Action Alternative
Loss of culturally significant sites, artifacts	⊗	⊗

Table Key:
⊗ No or Low Potential for Adverse Impact
⊕ Moderate Potential for Adverse Impact
⊕ High Potential for Adverse Impact

3.2.6.3 Mitigation Measures

Comprehensive Plan Policies
The Action Alternative 2025 Comprehensive Plan Land Use and Community Character Chapters include numerous goals and policies that address historic and cultural resources.

Regulations
The following federal, state, tribal, and local regulations will also be applied:
Federal

- National Historic Preservation Act of 1966.
- Archeological Resources Protection Act of 1979.

Washington State
Washington State has a number of laws that oversee the protection and proper excavation of archaeological sites (RCW 27.53, WAC 25-48), human remains (RCW 27.44), and historic cemeteries or graves (RCW 68.60). Under RCW 27.53, Department Archaeology and Historic Preservation regulates the treatment of archaeological sites on both public and private lands and has the authority to require specific treatment of archaeological resources. All precontact resources or sites are protected, regardless of their significance or eligibility for local, state,

or national registers. Historic archaeological resources or sites are protected unless DAHP has made a determination of "not-eligible" for listing on the WHR and the NRHP.

If human remains, burials, funery items, sacred objects, or objects of cultural patrimony are found during project implementation, all provisions of RCW 68.50.645 apply including notification of appropriate authorities.

If prehistoric artifacts or historic-period artifacts or features are found during project implementation, all work must cease within 200 feet of the find, Washington State Department Archaeology and Historic Preservation must be contacted and all provisions of RCW 27.53.060 shall be adhered to.

- State Environmental Policy Act and National Environmental Policy Act.
- Archaeology and Historic Preservation, RCW 27.34.22, and WAC 25-12.
- Governor's Executive Order 21-02, Archaeological and Cultural Resources.
- Shoreline Master Program.

Other Potential Mitigation Measures

- Coordinate with the Jamestown S'Klallam Tribe, DAHP, the Sequim Museum & Arts, other organizations, and interested parties to identify, document, and protect historic, archaeological, and cultural resources.
- Encourage early cultural resource review for development proposals with the potential to affect known or previously undocumented archaeological or historic resources.
- Avoid or minimize impacts to identified historic and archaeological resources through project design, site planning, or other appropriate mitigation measures whenever feasible.
- Promote the preservation, rehabilitation, and adaptive reuse of historically significant buildings and sites through available local, state, and federal preservation programs and incentives.
- Incorporate interpretive signage, public art, or educational features into public projects, where appropriate, to recognize Sequim's history and the cultural heritage of the Jamestown S'Klallam Tribe and other historically significant communities.

3.2.6.4 Significant Unavoidable Adverse Impacts

Future growth and development within Sequim could disturb or destroy previously undiscovered and undocumented archaeological or historical artifacts. With proposed mitigation measures, these impacts are not considered significant unavoidable adverse impacts.

4 Appendix A

Summary of Title 18 Zoning Text Amendments

Change Type	Chapter	Summary of Changes
F	18.10 General Provisions	• Establishes a clean legal foundation that reinforces Title 18 as the City's GMA-aligned land use code. • Moves away from narrative/interpretive permissions toward measurable standards.
F	18.15 Administration and Enforcement	• Creates clear internal operating rules. • Updated enforcement provisions that strengthen compliance as an ongoing responsibility. • Enforcement becomes a more explicit workflow.
S	18.20 Definitions	• Updated to be consistent throughout Title 18. • Consistent with RCW and WAC definitions. • Uses are defined more precisely. • Incorporated with Use Types and Use Tables and removes "narrative permissions".
S	18.25 Use Types	• Creates a single taxonomy of use types applied across all districts. • Provides a more systematic similar use determination process.
S	18.30 Establishment of Zoning Districts	• Provides a more straightforward map-to-permission relationship.

S	18.35 Residential Districts	• Change from R4-8 to R4-9 increasing by one unit/acre, and minimum lot size change from 5,400 to 4,840 square feet to align with density range.
		• Sets minimum and maximum density thresholds with calculations explained.
		• Updates setbacks and relies more on building and fire code for structure separation.
		• Provides consistent height for all residential.
		• Updates lot coverage to be a set amount rather than a sliding percentage formula for added predictability.
		• Updated use table to reflect use types that are allowed.
		• Supportive/transitional housing is more expressly regulated consistent with GMA updates.
		• Multifamily standards (up to 4-plexes) are embedded directly in chapter.
		• New cluster housing standards.
		• Establishes landscape standards.
		• Establishes building design standards for certain uses within this zone.
		• Updates to the Planned Residential Development standards.
		  ▫ Density calculations defined.
		  ▫ Flexibility for incentives becomes more rule-based than negotiated.
		  ▫ Delivers planned housing capacity consistently.
		  ▫ Allows up to 15% nonresidential uses.
		• Accessory structures and uses have improved clarity and administrative standards.

S	18.40 Commercial Districts	• Updated use tables for clarity of administration.

Change Type	Chapter	Summary of Changes

		• Updates setbacks that rely more on building and fire code for structure separation.
		  ▫ Required setbacks must be landscaped.
		• Bulk and dimensional standards are now enforced by zone instead of by use.
		  ▫ Max height is no longer a range and is instead capped as a single standard per zone.
		  ▫ Regional Commercial and Highway Commercial maximum heights are at 50', while Neighborhood Business remains at 35'.
		• Establishes landscape standards.
		• Accessory structures and uses have improved clarity and administrative standards.

S	18.45 Business and Employment Districts	• Format change of the chapter to be more integrated with the rest of the zones. • Eliminates use mix requirements. • Bulk and dimensional standards are established by zone instead of by use. • Establishes landscape standards. • Establishes building design standards for uses within this zone. • Accessory structures and uses have improved clarity and administrative standards.
S	18.50 Downtown Districts	• Updated use table to reflect permitted uses resulting in less reliance on similar use determinations or prohibited uses. • Lessens the Floor-Area-Ratio to be more form-based consistent with other zones. • Establishes landscape standards. • Establishes building design standards for uses within this zone. • Accessory structures and uses have improved clarity and administrative standards.

S	18.55 Mixed Use Districts	• Adds PRC zone into this section with standards and use table.
		• Updated use table to reflect use types that are allowed.
		• Updated bulk and dimensional requirements that eliminate standards by use and codify them by zone.
		  ▫ Max height is no longer a range and is instead capped as a single standard per zone.
		  ▫ LD and CMU height is capped at 50', while PRC is capped at 45'.
		  ▫ Setbacks change from ranges to fixed minimums.
		• Establishes landscape standards.
		• Establishes building design standards for uses within this zone.
		• Accessory structures and uses have improved clarity and administrative standards.

S/P	18.60 Master Plans	• Master plan becomes a much firmer controlling document for subsequent development. • Development flexibility centers on the scope of alternative standards. • Specifies how the underlying zone is the baseline for requesting alternative development standards.
F	18.65 Manufactured Home and Mobile Home Parks	• Consolidates MH Park standards for development with the new MH Overlay chapter. • Improves ease of administration.
S	18.70 Other Land Use Districts	• Updated use table to better reflect what type of uses are allowed. • Does not include bulk and dimensional standards to allow the conditional permitting process to establish based on use needs and compatibility with surrounding areas.

Change Type	Chapter	Summary of Changes
		• Establishes a process for existing uses within these districts.
S	18.75 Open Space and Landscaping	• Implements a requirement to provide greater emphasis on drought-tolerant and native plant species. • Removes permanent irrigation requirements but requires that plantings must survive and be maintained for the life of development. • Establishes planting and maintenance requirements for landscaping. • Consolidates parking lot plantings into a single chapter that will be referenced in code's off-street parking chapter. • Establishes the minimum open space requirements for various types of land division and development.
F	18.80 Off-Street Parking	*These changes were substantially adopted as part of SMC 18.21 in early 2026.* • Removes landscaping requirements, as these are now in SMC 18.75 • Consolidates Off-Street Parking with Electric Vehicle Infrastructure chapters into a single chapter. • Modernizes parking standards (stall size, surfacing, tandem parking). • Eliminates or reduces parking for housing types where state law discourages parking mandates.
F	18.85 Nonconforming Standards	*No proposed changes.*
F	18.90 Sign Code	*No proposed changes.*
S/P	18.95 Essential Public Facilities	• Shifts away from special property uses and focuses on applicable EPF state law. • Procedurally integrates EPFs into the CUP process and eliminates a standalone EPF or Special Use Permit. • Public Facilities zone designation is no longer required.
F	18.100 Transitory Accommodations	*This is a new chapter and was adopted as part of SMC 18.21 in early 2026.* • Authorizes temporary housing as an allowed use on religiously owned properties per state requirements. • Applies operational, health, and safety standards without over-regulation.
F	18.105 Wireless Communication Facilities	*No proposed changes.*
F	18.110 Affordable Housing Exceptions	*This is a new chapter and was adopted as part of SMC 18.21 in early 2026.* • Creates a clear, codified pathway to waive development standards when affordability is provided. • Requires findings and long-term affordability covenants. • Applies flexibility for specific affordable housing providers.
S	18.115 Day Care Facilities	• Updated for better alignment with state requirements.
S/P	18.120 Design Review	• Clarifies when design review is required. • Removes site planning requirements, as these will now be part of SMC 18.125. • Updates process to be more predictable and improves ease of administration. • Removes building design requirements, as these are now present in specific zones.
S/P	18.125 Site Plan Review	*This is a new chapter.*

Change Type	Chapter	Summary of Changes
		• Becomes a primary "gatekeeping" permit for most non-exempt and non-subdivision development. • Provides threshold for improvements similarly to land divisions projects, as applicable. • Includes standards for maintenance of previously developed, but now vacant/abandoned properties.
F	18.130 Accessory Dwelling Units	*This is a new chapter and was adopted as part of SMC 18.21 in early 2026.* • Allows two ADUs per lot consistent with state mandates. • Removes owner-occupancy, frontage improvement, and excessive parking requirements. • Explicitly allows ADUs to be sold, condominiumized, or unit-lot subdivided – independent of the primary use.
S	18.135 Home Occupation Permits	• Updated for clearer administration of outright allowances via HOP and when ACUP is required.
F	18.140 Conditional Use Permits	• Updates CUPs to a type B application, which is reviewed either by the Hearing Examiner or Council depending on the application. • Updates modification process to clearly establish review authority.
F	18.145 Mobile Food Vendors	*No proposed changes.*
F	18.150 Annexations	*No proposed changes*
S	18.155 Temporary Use Permits	• Provides clarity for obtaining TUPs on private property. • Establishes allowances for recurring or non-recurring uses of land. • Revamps the time limits for TUPs from a condition of approval to standards for types of uses. • Adds classification boundaries for on and off-site uses for ease of administration.
F	18.160 Variances	*No proposed changes.*
F	Current SMC 18.70 and 18.80	SMC 18.70 Wetlands and SMC 18.80 Critical and Environmentally Sensitive Areas Protection will remain fully intact and unchanged as part of this update and will be moved to SMC Title 16 "Environment" upon adoption of the new Title 18. Updates to these chapters will occur in 2027.
F	Current SMC 18.82	SMC 18.82 Clearing and Grading will remain fully intact and unchanged as part of this update and will be moved to SMC Title 15 "Buildings and Construction" upon adoption of the new Title 18.
Table Notes: *S = Substantive Change* *F = Formatting Change* *P = Procedural Change*		

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City of Sequim 2025 Comprehensive Plan Update

FINAL
Supplemental Environmental Impact Statement

October 12, 2026

Contents

1 Cover Letter 4

2 Fact Sheet 5

3 Introduction and Summary 9

4 Draft SEIS Comments and Responses 13

5 Clarifications and Corrections 20

6 FSEIS Conclusion 22

7 Appendix – Marked Comment Letters 22

JAMESTOWN S'KLALLAM TRIBE LAND ACKNOWLEDGMENT

The land that we know as Sequim [sxʷčkʷíyəŋ "soo-ch-kwee-ing"] was once inhabited solely by first peoples known as the S'Klallam [nəxʷsƛ̓áyɬəm'"new-sklai-yem"] People, represented by the three Tribal Governments, Lower Elwha Klallam, Jamestown S'Klallam and Port Gamble S'Klallam. We serve as stewards of the land within the City of Sequim with the same care and consideration the S'Klallam / Klallam Tribes has and continues to provide. This acknowledgement is a respect to the S'Klallam People and their history.

ANCESTRAL LANDS OF THE COAST SALISH

Sequim is located in the traditional aboriginal territory of the Coast Salish peoples, who live around the Salish Sea in what is now Washington State and the Canadian province of British Columbia. The Coast Salish Tribes have lived here since time immemorial and while each tribe is unique, all share in having a deep historical connection and legacy of respect for the land and natural resources. These sovereign tribal nations enrich the region through environmental stewardship, cultural heritage, and economic development, and collaborate with local governments to shape the region's future.

1 Cover Letter

October 12, 2026

Subject: City of Sequim 2025 Comprehensive Plan Update Final Supplemental Environmental Impact Statement

Dear Reader:

The City of Sequim has prepared this Final Supplemental Environmental Impact Statement (FSEIS) for the Sequim 2025 Comprehensive Plan Update and associated amendments to Title 18 of the Sequim Municipal Code. The FSEIS completes the environmental review process initiated with issuance of the Draft Supplemental Environmental Impact Statement (DSEIS) on July 13, 2026.

The DSEIS evaluated the potential environmental impacts associated with adoption and implementation of the City's 2025 Comprehensive Plan Periodic Update. The Comprehensive Plan Update constitutes a nonproject action under the State Environmental Policy Act (SEPA), Chapter 43.21C RCW and Chapter 197-11 WAC.

The City received two written comment letters during the DSEIS comment period, which extended from July 13 through August 13, 2026. The City reviewed and considered each comment in accordance with WAC 197-11-560.

The comments received do not identify new significant environmental impacts, change the environmental conclusions presented in the DSEIS, require evaluation of additional alternatives, or require modification of the impact analysis or mitigation measures contained in the DSEIS. Responses to the substantive comments received are provided in Section 4 of this FSEIS.

During deliberations at the close of the Sequim Planning Commission's public hearing on the full periodic update package on October 6, 2026, the Planning Commission recommended the Action Alternative as the Preferred Alternative and that a FSEIS be drafted and forwarded to the City Council as part of its legislative process on the 2025 Comprehensive Plan Periodic Update package.

This FSEIS supplements rather than repeats the environmental analysis contained in the July 13, 2026 DSEIS. The DSEIS is incorporated by reference and should be read together with this FSEIS. Together, the DSEIS and this Final SEIS constitute the City's environmental impact statement for the 2025 Comprehensive Plan Periodic Update package.

The DSEIS and additional information are available on the project website: 2025 Comprehensive Plan | Sequim, WA - Official Website

Thank you for your interest and participation in the City of Sequim 2025 Comprehensive Plan Update.

Sincerely,



Karla Boughton
Community and Economic Development Director
SEPA Responsible Official
City of Sequim

2 Updated Fact Sheet

Project Title
City of Sequim 2025 Comprehensive Plan Update Final Supplemental Environmental Impact Statement (FSEIS)

Proposed Action
The City of Sequim is completing the periodic update of its citywide Comprehensive Plan consistent with the Washington Growth Management Act (GMA), Chapter 36.70A RCW.

The Proposed Action consists of adoption of the City of Sequim 2025 Comprehensive Plan Update and associated amendments to Title 18 of the Sequim Municipal Code. The Comprehensive Plan establishes the City's long-term framework for land use, housing, transportation, economic development, environmental protection, utilities, public services and facilities, parks and recreation, climate resilience, and related growth-management policies through the 2045 planning horizon. SMC Title 18 are the implementing development regulations.

The Proposed Action accommodates the City's adopted population, housing, and employment growth allocations; provides sufficient capacity for housing needs across income levels; incorporates recent state legislative requirements; and updates the City's goals, policies, future land use designations, and implementing development regulations.

Alternatives Considered
The DSEIS evaluated two alternatives:

No Action Alternative. Continuation of the City's existing 2015 Comprehensive Plan and existing development regulations.

Proposed Action Alternative. Adoption of the City of Sequim 2025 Comprehensive Plan Update and associated amendments to Title 18 SMC.

As a component of the Planning Commission's public hearing process on the Draft 2025 Comprehensive Plan Periodic Update package, after deliberations, identified the Action Alternative as the Preferred Alternative during their motion for recommendation to the City Council at the conclusion of its October 6, 2026 continued public hearing.

Lead Agency and Proponent
City of Sequim

SEPA Responsible Official
Karla Boughton
Community and Economic Development Director
City of Sequim
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Sequim, WA 98382
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(360) 683-4908

Location
All incorporated areas of the City of Sequim.

Required Approvals
Adoption by the Sequim City Council.

Principal Authors and Contributors
The Final SEIS has been prepared under the direction of the Sequim Community and Economic Development Department.

Consultants:

Otak – Principal Authors
The Leland Group – Land Use + Housing
Wilson Engineering – Water
RH2 - Sanitary Sewer
Transpo Group – Transportation
Herrera Environmental – Storm and Surface Water

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Katie Cole, P.E. Project Engineer
Austin Wagner, Project Engineer
Amy Doughtery, Business Assets Senior Manager
Meggan Uecker, Resource Analyst

Environmental Documents
Draft Supplemental Environmental Impact Statement
Date of Issuance: July 13, 2026
Comment Period: July 13 through August 13, 2026

Final Supplemental Environmental Impact Statement
Date of Issuance: October 12, 2026

Prior Environmental Review
The Final SEIS supplements and incorporates the environmental review identified in the DSEIS, including:

City of Sequim Comprehensive Plan Final EIS, July 1996.
City of Sequim Comprehensive Plan Update Determination of Nonsignificance and associated SEPA Checklist, June 2006.

Relationship of the Draft and Final SEIS
This Final SEIS supplements the July 13, 2026 Draft SEIS. The Final SEIS does not repeat the environmental analysis contained in the DSEIS except where necessary to provide context for responses to comments. The City has independently reviewed the comments received on the DSEIS and determined that they do not require modification of the environmental analysis, identification of additional significant impacts, evaluation of additional alternatives, or additional mitigation measures.

The DSEIS and FSEIS together constitute the City's Supplemental Environmental Impact Statement for the 2025 Comprehensive Plan Periodic Update package.

Location of Background Material
Background information, reference material and other documents related to this proposal can be found on the project website: 2025 Comprehensive Plan | Sequim, WA - Official Website.

Purchase/Availability of Final SEIS
The FSEIS is available for review at the Sequim Community and Economic Development Department, 2nd floor of the Sequim Civic Center 152 W Cedar Street, Sequim WA 98383 and the Sequim Library 630 N Sequim Avenue, Sequim, WA 98382.

The FSEIS is posted on the project website2025 Comprehensive Plan | Sequim, WA - Official Website

Phased Review
Phased review of the proposal pursuant to WAC 197-11-060(5) is anticipated. Phase review assists agencies and the public to focus on issues that are ready for decision and exclude from consideration issues already decided or not yet ready for decision. In phased review, broader environmental documents, such as the SEIS, may be followed by narrower documents that incorporate prior general discussion by reference and concentrate solely on the issues specific to that phase of the proposal.

Distribution List
Federal and Tribal Agencies
Jamestown S'Klallam Tribe
U.S. Department of Energy – Pacific Northwest National Laboratory (PNNL)
U.S. Army Corps of Engineers

State and Regional Agencies
Department of Commerce
Department of Archaeology and Historic Preservation

Department of Ecology
Department of Fish and Wildlife
Department of Transportation
Olympic Region Clear Air Agency (ORCAA)

Local and Regional Jurisdictions/Agencies

Clallam County
Clallam Transit
City of Port Angeles
City of Port Townsend
Jefferson County
Port of Port Angeles
Clallam County Fire District #3 Fire District
Sequim School District

Utilities

Clallam County Public Utilities District

Media

Peninsula Daily News
Sequim Gazette
KSQM
KONP

Community Organizations and Individuals

2025 Comprehensive Plan Update email list.

3 Introduction and Summary

3.1 Introduction

This section provides a summary of the City's proposal, alternatives and environmental evaluation.

3.1.1 Overview of the Proposal

The City of Sequim is completing the periodic update of its citywide Comprehensive Plan consistent with the Washington Growth Management Act (GMA), Chapter 36.70A RCW.

The Proposed Action consists of adoption of the City of Sequim 2025 Comprehensive Plan Update and associated amendments to Title 18 of the Sequim Municipal Code. The Comprehensive Plan establishes the City's long-term framework for land use, housing, transportation, economic development, environmental protection, utilities, public services and facilities, parks and recreation, climate resilience, and related growth-management policies through the 2045 planning horizon. SMC Title 18 are the implementing development regulations.

The Proposed Action accommodates the City's adopted population, housing, and employment growth allocations; provides sufficient capacity for housing needs across income levels; incorporates recent state legislative requirements; and updates the City's goals, policies, future land use designations, and implementing development regulations.

The DSEIS evaluated two alternatives:

- *No Action Alternative*. Retention of the City's existing 2015 Comprehensive Plan and existing development regulations; assumes no changes to the plan structure, future land use plan, adopted policies or zoning regulations. The No Action Alternative has adequate land capacity to meet total housing and job allocations but does not sufficiently address housing capacity by income bands and does not fully meet new GMA requirements for a periodic update.

- *Proposed Action Alternative*. Adoption of the City of Sequim 2025 Comprehensive Plan Update and associated amendments to Title 18 SMC. The Proposed Action represents the City's periodic update under the Washington Growth Management Act and updates Comprehensive Plan goals, policies, future land use designations, and development regulations to accommodate project growth through the 2045 planning horizon. The Proposed Action provides sufficient land capacity to accommodate adopted population, housing and employment growth allocations, including housing needs across all income levels, while incorporating recent state legislative requirements related to housing, multi-modal transportation, climate planning and resiliency, and other planning policy updates. The accompanying amendment to SMC Title 18 implements the updated Comprehensive Plan and ensure consistency with current state law, as well as targeted procedural, substantive and formatting revisions that clarify the City's development regulations.

3.1.2 Study Area

The study area includes all land within the City of Sequim corporate city limits, approximately 3,500 acres and 6.37 square miles.

3.1.3 Organization of the Final SEIS

The Draft SEIS is the foundation for the initial environmental analysis that was conducted, is a companion document to this FSEIS and is incorporated by reference in accordance with WAC 197-11-635. The information provided in this FSEIS attempts not to duplicate or repeat information presented in the Draft SEIS, except to provide context to the reader. The exception to this is where additional or updated information is included to provide context or supplement information included in the DSEIS. The Final SEIS focuses on analysis of the Preferred Alternative, a chapter on Corrections and Clarifications, and a chapter on Comments and Responses to Comments. The reader should refer to both the Draft SEIS and the Final SEIS documents in order to obtain all the information analyzed during the EIS process.

3.1.4 Objectives

SEPA requires a statement of proposal objectives, purpose and need to which the proposal is responding. The primary objective and need for this proposal is to complete the 2025 periodic update of the Sequim Comprehensive Plan to meet Growth Management Act requirements, and

- Demonstrate capacity to accommodate housing and jobs growth allocations through 2045.
- Meet legislative requirements for housing by income levels and variety of housing types.
- Support economic development and business for prosperous community and economic vitality.
- Support transit, non-motorized and other alternative transportation modes through appropriate housing choices, employment opportunities, and multimodal transportation infrastructure.
- Ensure that public services, multimodal transportation infrastructure and capital facilities can be efficiently and effectively provided to support development at appropriate levels of service.
- Enhance access to parks, recreation and cultural amenities.

3.2 SEPA Process

3.2.1 Overview

Under the State Environmental Policy Act (SEPA), agencies conduct environmental review of actions that could affect the environment – including policy and regulation changes (considered non-project actions). Preparation of an EIS is required for actions that have potentially significant impacts so that the public, agencies, Tribes, an City decision-makers have information about the environmental effects of changes before a decision is made. The Draft and Final SEIS provide an analysis of environmental impacts as appropriate to the general nature of a comprehensive plan update. The adoption of comprehensive plans and other long-range planning documents is classified by SEPA as a non-project action. A non-

project action is defined as an action that is broader than a single site-specific project and involves decisions on policies, plans and programs. The Draft and Final SEIS discuss impacts appropriate to the scope of the non-project proposal and to the level of planning for the proposal (WAC 197-11-442). Additional environmental review will occur as other project or non-project actions are proposed in the future. Future review could occur in the form of supplemental EISs, SEPA addenda, or determinations of non-significance.

3.2.2 Draft SEIS

The Draft SEIS identified environmental conditions, potential impacts, and measures to reduce unavoidable adverse impacts that could result the 2025 Comprehensive Plan Periodic Update.

The City issued the DSEIS on July 13, 2026 and provided a public comment period through August 13, 2026. Notice of Availability was distributed to federal, Tribal, state, regional, and local agencies; utilities; media organizations; community organizations; individuals on the City's Comprehensive Plan Update mailing list; and other interested parties.
The Draft SEIS evaluated each of the following topics for the two alternatives:
Natural Environment

- Natural and Critical Areas
- Air Quality
- Climate and Hazard Mitigation

Built Environment

- Land Use
- Plans and Policies
- Housing
- Transportation
- Public Services and Utilities
- Historic and Cultural Resources

The City received two written comment letters during the DSEIS comment period.

3.2.3 Final SEIS

This Final Supplemental Environmental Impact Statement completes the environmental review of the City of Sequim 2025 Comprehensive Plan Update and associated amendments to Title 18 of the Sequim Municipal Code.

Consistent with WAC 197-11-560, the purposes of this Final SEIS are to:

1. Document and respond to substantive comments received on the DSEIS;
2. Identify any corrections, clarifications, or modifications to the environmental analysis resulting from those comments; and
3. Complete the SEPA environmental review process for the proposal.

Except as specifically stated in this FSEIS, the analysis and conclusions of the July 13, 2026 DSEIS remain unchanged.

Relationship to the Draft SEIS

The DSEIS contains the City's detailed evaluation of existing environmental conditions, alternatives, environmental impacts, mitigation measures, and significant unavoidable adverse impacts. Rather than reproduce that analysis, this FSEIS incorporates the DSEIS by reference and focuses on information developed following issuance of the DSEIS, including comments received during the public comment period and the City's responses. Readers should therefore consider the DSEIS and FSEIS together.

Final SEIS Review
Neither of the written comment letters resulted in the identification of new significant environmental impacts or required substantive modification of the environmental analysis contained in the DSEIS.

The City reviewed each comment to determine whether it:

- raised an issue regarding the adequacy or accuracy of the environmental analysis;
- identified information materially affecting the environmental analysis;
- identified a reasonable alternative not previously evaluated;
- identified an environmental impact not adequately addressed;
- identified additional mitigation that should be evaluated; or
- otherwise warranted correction or supplementation of the DSEIS.

Based upon that review, the City determined that the comments do not require modification of the DSEIS environmental analysis.

3.2.4 Preferred Alternative

The Proposed Action Alternative has been chosen as the Preferred Alternative.

The Proposed Action Alternative is the adoption of the City of Sequim 2025 Comprehensive Plan Update and associated amendments to Title 18 SMC. The Proposed Action represents the City's periodic update under the Washington Growth Management Act and updates Comprehensive Plan goals, policies, future land use designations, and development regulations to accommodate project growth through the 2045 planning horizon. The Proposed Action provides sufficient land capacity to accommodate adopted population, housing and employment growth allocations, including housing needs across all income levels, while incorporating recent state legislative requirements related to housing, multi-modal transportation, climate planning and resiliency, and other planning policy updates. The accompanying amendment to SMC Title 18 implements the updated Comprehensive Plan and ensure consistency with current state law, as well as targeted procedural, substantive and formatting revisions that clarify the City's development regulations.

3.2.5 Phased Review

Phased review of the proposal pursuant to WAC 197-11-060(5) is anticipated. Phase review assists agencies and the public to focus on issues that are ready for decision and exclude from consideration issues already decided or not yet ready for decision. In phased review, broader environmental documents, such as the SEIS, may be followed by narrower documents that incorporate prior general discussion by reference and concentrate solely on the issues specific to that phase of the proposal.

4 Draft SEIS Comments and Responses

4.1 Draft SEIS Comment Period and Comments Received

The City issued the DSEIS on July 13, 2026 and provided a public comment period through August 13, 2026. The City received two comments specifically submitted on the DSEIS and numerous comments on the Draft Comprehensive Plan and Title 18. The DSEIS letters are reproduced in full in Appendix A and summarized below:

Public Comment Letter	Commenter	Organization, if any	Date	DSEIS topics
14	Pasco	N/A	7/20/2026	Water system capacity and pressure, transportation and traffic safety, housing affordability, public services, community character, and environmental impacts of new development.
26	Soule	N/A	8/3/2026	Water conservation and utility policies, groundwater protection, effects of climate change and drought, need for enhanced watershed coordination.

4.2 Responses to Draft SEIS Comments

WAC 197-11-560 allows a lead agency to respond individually to comments, group related comments, cross-reference comments and corresponding portions of the EIS, or use other reasonable means to provide an appropriate response.

The City has summarized the substantive environmental issues raised by the commenters below. The complete comment letters are included in the Appendix.

Comments addressing the merits of Comprehensive Plan policies, development regulations, land use choices, or other policy matters rather than the adequacy of the environmental analysis are identified as such and are provided to City decision-makers for consideration as part of the legislative process.

4.3 Other Public Comments Received

The City received public comments during the Draft 2025 Comprehensive Plan and Draft SMC Title 18 public review process addressing a range of issues, some of which overlap with environmental topics evaluated in the DSEIS but were not submitted to the City as DSEIS comment letters. Therefore, these comments were reviewed and addressed through the City's *Issues and Response Memo,* (9/29/2026) prepared for Planning Commission consideration as part of its public hearing and deliberation process. *(This document is an exhibit to the October 6, 2026 Planning Commission Continued Public Hearing Agenda Packet).*

The *Issues and Response Memo* provides responses to substantive public comments concerning infrastructure capacity, housing and growth, critical areas and natural resources, and other planning and policy matters. The *Issues and Response Memo* is included in the Planning Commission's legislative record, available for review as part of the Comprehensive Plan Update materials and incorporated into this FSEIS by reference.

Table 4-1 Summary of Draft SEIS Comments

DSEIS Commentor	Comment	Response
Pasco		
Water Supply and Pressure	The commenter expresses concern regarding reduced water pressure in existing residential neighborhoods associated with recent development along South 7th Avenue, increased water consumption, and the need to prioritize funding for water system improvements.	Comment noted. The Draft SEIS evaluates water supply and infrastructure capacity associated with projected growth, including the City's adopted Water System Plan and Capital Facilities Plan. As described in Section 3.1.3 of the *Issues and Response Memo*, the City's existing water rights and source capacity are sufficient to accommodate projected growth through 2045. However, systemwide water availability is distinct from localized distribution capacity and pressure, which may vary based on infrastructure conditions and development demands. The City evaluates localized water pressure, distribution capacity, and fire-flow requirements through ongoing utility planning, hydraulic modeling, capital improvement programming, and project-level development review. The concerns identified regarding the South 7th Avenue area are acknowledged and are addressed through these implementation processes. The comment does not identify new information requiring modification of the planning level environmental analysis in the DSEIS.
Transportation and Alternative Mobility	The commenter identifies increased traffic along South 7th Avenue and Silberhorn Road, raises concerns regarding intersection safety, and questions the availability of alternative transportation services south of US 101.	Comment noted. The Draft SEIS evaluates transportation impacts associated with projected growth using the City's 2026 Transportation Master Plan (TMP). As discussed in Section 3.1.5 of the *Issues and Response Memo*, the TMP evaluates future transportation demand through 2045 and identifies improvements necessary to maintain adopted transportation service standards. The TMP specifically recognizes the need for future improvements at the South 7th Avenue and Silberhorn Road intersection. The TMP also addresses multimodal transportation and regional coordination, including coordination with Clallam Transit and other transportation providers. Specific intersection improvements, traffic-control measures, and transit service

		changes are addressed through subsequent transportation planning, capital improvement programming, and coordination with responsible agencies. The comment does not identify new transportation impacts requiring modification of the DSEIS analysis.
Housing Affordability	The commenter questions whether recent residential development provides housing affordable to a broad range of income levels.	The Draft SEIS evaluates the City's anticipated housing growth, land capacity, and development patterns under the No Action and Action Alternatives. Comment noted. As discussed in Section 3.2 of the *Issues and Response Memo*, the Comprehensive Plan Update incorporates a Housing Needs Assessment, Land Capacity Analysis, and Adequate Provisions analysis to address housing needs across income levels consistent with Growth Management Act requirements. The City has also identified recommended revisions to housing policies and supporting analyses to strengthen implementation of its housing objectives, particularly for lower-income households. While the affordability of individual developments is an important concern, the Comprehensive Plan establishes the long-range framework for accommodating housing needs rather than determining the market price or affordability of individual projects. The comment does not identify an additional environmental impact requiring modification of the DSEIS.
Healthcare, Veterinary Services and Community Character	The Draft SEIS evaluates the potential effects of projected growth on public services and facilities, land use, and community character. The Comprehensive Plan establishes policies intended to guide growth, coordinate public services, and maintain community identity while accommodating adopted population and housing allocations.	Comment noted. The Draft SEIS evaluates the potential effects of projected growth on public services, land use, and community character. Section 3.2 of the *Issues and Response Memo* further addresses concerns regarding healthcare availability and recognizes that the City does not directly regulate healthcare providers, staffing, or service delivery. In response to public comments, staff recommended adding Capital Facilities Policy CF-1.2 to support coordination with healthcare providers, public health agencies, emergency medical services, Tribal healthcare providers, and regional partners regarding healthcare needs associated with growth and demographic change.

		Concerns regarding veterinary services and community character are also acknowledged. The Comprehensive Plan establishes policies intended to guide the location, character, and design of future development while accommodating adopted growth allocations. The availability of individual medical and veterinary providers is influenced by factors beyond the City's direct land use authority. These concerns do not identify new significant environmental impacts requiring modification of the DSEIS analysis.
Natural Environment, Habitat and Future Development	The commenter raises concerns regarding tree removal, loss of wildlife habitat associated with residential development, and the need for environmental review before future development is approved. The commenter also expresses concern regarding development near the marina and the protection of lands with historical and cultural significance to Tribes.	Comment noted. The Draft SEIS evaluates potential environmental impacts associated with future growth, including effects on land use, critical areas, vegetation, wildlife habitat, and natural resources. As discussed in Section 3.3 of the *Issues and Response Memo*, the City's Natural Environment and Climate and Resilience chapters establish policies for protecting environmental resources, while the City's Critical Areas Ordinance, shoreline regulations, and other applicable development standards provide enforceable requirements for individual development proposals. The Comprehensive Plan Update is a nonproject action and does not authorize individual development projects. Future development remains subject to applicable project-level review, including evaluation of critical areas, habitat, stormwater, shoreline conditions, cultural resources, and other environmental considerations as required. The concerns identified by the commenter are acknowledged but do not identify new significant environmental impacts requiring modification of the DSEIS analysis.
Soule		
Water Conservation and Utility Revenue	The commenter identifies a potential conflict between Comprehensive Plan policies promoting water conservation and policies supporting utility revenue generation. The commenter recommends prioritizing water conservation over revenue generation,	Comment noted. The Draft SEIS evaluates water supply, utility capacity, and conservation measures associated with projected growth. As discussed in Section 3.1.3 of the *Issues and Response Memo*, the City's Water System Plan demonstrates adequate water supply and source capacity to accommodate projected growth

	particularly during officially declared drought conditions.	through 2045 while recognizing the importance of water conservation and responsible groundwater management. The City's water demand assumptions have decreased since the previous Water System Plan, reflecting conservation efforts, reductions in distribution-system leakage, and improved system management. The City acknowledges the commenter's concern regarding the relationship between water conservation and utility financial sustainability. In response to Comment #26, staff has recommended revisions to Comprehensive Plan Policy LU-12.3 to expand the sources informing the City's water conservation program to include City climate and sustainability studies and other relevant reports, along with support for public education and outreach. These revisions are identified in *Draft Comprehensive Plan and Appendices Proposed Revisions Crosswalk. (This document is an exhibit to the October 6, 2026 Planning Commission Continued Public Hearing Agenda Packet).* The comment raises a policy consideration rather than identifying a new significant environmental impact or deficiency in the DSEIS analysis.
Climate Resilience, Water Supply and Watershed Coordination	The commenter recommends expanding water conservation policies to reference climate and sustainability studies and other relevant City reports. The commenter also recommends explicitly recognizing coordination with water resource partners in the Dungeness watershed in the City's climate resilience policies.	Comment noted. The Draft SEIS evaluates potential environmental impacts associated with projected growth on water resources, groundwater, and climate resilience. As discussed in Sections 3.1.3 and 3.3 of the *Issues and Response Memo*, the Comprehensive Plan recognizes potential changes in precipitation, snowpack, drought conditions, and water availability and establishes policies supporting water conservation, reclaimed water use, sustainable resource management, and coordination with regional partners. In response to Comment #26, staff has recommended revisions to Section 10.2.1, Water Resources, and Policy CR-1.2 to expressly recognize cooperation with water resource partners in the Dungeness watershed while retaining the City's decision-making authority. These revisions are identified in These revisions are identified in the These revisions are identified in These revisions are identified in the *Draft Comprehensive Plan*

		and Appendices Proposed Revisions Crosswalk. strengthen and clarify the City's existing policy direction regarding climate resilience and watershed coordination. The recommended revisions are consistent with the environmental analysis presented in the DSEIS and do not identify new significant impacts requiring additional environmental analysis.
Editorial Corrections	The commenter identifies two editorial corrections in the Aquifer Recharge section of the Draft Comprehensive Plan, replacing "ground water" with "groundwater" and "digression" with "degradation."	The City acknowledges the editorial corrections and has included the recommended changes to Section 9.2.2 in *Draft Comprehensive Plan and Appendices Proposed Revisions Crosswalk.* These corrections improve the accuracy and clarity of the Comprehensive Plan text and do not affect the environmental analysis or conclusions contained in the DSEIS.

5 Clarifications and Corrections

5.1 Evaluation of Proposed Comprehensive Plan and Title 18 Revisions

Following issuance of the Draft Supplemental Environmental Impact Statement (DSEIS), the City considered public and agency comments on the Draft Comprehensive Plan and associated amendments to Title 18 of the Sequim Municipal Code. As part of the legislative review process, City staff prepared consolidated revisions crosswalks identifying proposed modifications to the Comprehensive Plan, supporting appendices, and development regulations. These revisions are documented in *Draft Comprehensive Plan and Appendices Proposed Revisions Crosswalk,* and *Draft SMC Title 18 Proposed Revisions Crosswalk*, provided to the Planning Commission for its October 6, 2026 meeting. *(These documents are an exhibit to the October 6, 2026 Planning Commission Continued Public Hearing Agenda Packet).*

The Planning Commission, in its motion to recommend to the City Council the 2025 Comprehensive Plan Periodic Update package, included incorporation of these revisions into the Planning Commission Recommended 2025 Comprehensive Plan Periodic Update package, forwarded to the City Council for its legislative review process.

5.1.1 Comprehensive Plan Revisions

The proposed Comprehensive Plan revisions primarily clarify and strengthen existing goals, policies, and supporting information related to land use, housing, community character, transportation, capital facilities and utilities, parks and open space, natural resources, and climate resilience. Several revisions respond directly to public and agency comments by providing additional policy direction concerning water conservation, watershed coordination, housing affordability, healthcare coordination, habitat protection, stormwater management, and environmental stewardship.

The revisions also include refinements to supporting housing analyses and capital facilities documentation, along with editorial and technical corrections intended to improve clarity, accuracy, and internal consistency.

These revisions generally reinforce the policy framework and environmental protection measures associated with the Action Alternative evaluated in the DSEIS.

5.1.2 Draft SMC Title 18 Development Regulation Revisions

The proposed revisions to Draft SMC Title 18 primarily refine the draft development regulations through corrections to terminology, use classifications, dimensional standards, permitted uses, master-planning provisions, parking requirements, landscaping standards, and design review procedures.

Certain revisions provide additional specificity regarding building heights, setbacks, parking, and alternative development standards. The master-planning provisions include performance requirements intended to ensure that alternative standards achieve equivalent or superior results for applicable design, transportation, stormwater, public safety, and infrastructure considerations.

These refinements are intended to implement the land use and housing framework established by the proposed Comprehensive Plan and evaluated as the Action Alternative in the DSEIS.

5.1.3 Environmental Review Determination

The City reviewed the proposed revisions to the Comprehensive Plan, supporting appendices, and SMC Title 18 to determine whether they would alter the environmental assumptions, growth allocations, development densities or intensities, infrastructure demands, or anticipated impacts evaluated in the DSEIS. It was determined that the revisions remain consistent with the range of development and environmental effects evaluated under the Action Alternative and do not introduce new probable significant adverse environmental impacts, require evaluation of additional alternatives, or necessitate additional mitigation measures.

Accordingly, the City determines that the proposed revisions do not require additional environmental analysis or modification of the conclusions presented in the DSEIS. The Action Alternative, incorporating the proposed revisions, remains the Preferred Alternative. All applicable environmental protections and mitigations identified in the DSEIS remain applicable, and future site-specific development proposals will be subject to permitting requirements and project-level environmental review, as appropriate, consistent with the phased review provisions of WAC 197-11-060(5).

5.2 Draft SEIS Corrections

During preparation of the FSEIS, the City identified inconsistencies in the numbering of certain sections, subsections, tables, and exhibits within the July 13, 2026 DSEIS. A corrected version of the DSEIS will be issued concurrently with the FSEIS to address these numbering inconsistencies. These revisions are administrative and do not alter the substantive environmental analysis, mitigation measures, or conclusions presented in the original DSEIS. The corrected DSEIS will supersede the original version for purposes of document organization and cross-referencing and should be read together with the FSEIS. The table below identifies the corrections:

Table 5.2-1 Draft SEIS Editorial Corrections

Location	Reference	Action
Table of Contents	Chapter 2 and Chapter 3 titles	• Change Chapter 2 title to Proposal and Alternatives • Change Chapter 3 title to Affected Environment, Impacts and Mitigation Measures • Chapter 4 shall be Appendix A • Chapter 5 shall be References/Bibliography
Section 1.6, page 20	References to Chapter 3 Alternatives	Changed to Chapter 2 Proposal and Alternatives
Page 27	"2 Alternatives" title	Change to "2 Proposal and Alternatives"
Page 27-54	Chapter 2 Proposal and Alternatives	Ensure numbering is consistent for section headers and tables/figures.

Pages 55-163	Chapter 3 Affected Environment, Impacts and Mitigation Measures	Ensure numbering is consistent for section headers and tables/figures

6 FSEIS Conclusion

The City has reviewed and considered the written comments received on the July 13, 2026 DSEIS in accordance with WAC 197-11-560. The City also evaluated the proposed revisions to the Draft Comprehensive Plan, supporting appendices, and Draft Title 18 of the Sequim Municipal Code to determine whether they would alter the environmental assumptions or conclusions presented in the DSEIS.

Based upon this review, the City determines that the comments and proposed revisions do not identify new probable significant adverse environmental impacts that were not adequately addressed in the DSEIS and do not require modification of the alternatives, additional environmental analysis, or identification of additional mitigation measures.

The environmental analysis, mitigation measures, and conclusions contained in the July 13, 2026 DSEIS therefore remain unchanged. Administrative corrections to section, subsection, table, and exhibit numbering have been incorporated into a corrected version of the DSEIS issued concurrently with this FSEIS. These corrections do not alter the substantive environmental analysis or conclusions. The Action Alternative, incorporating the proposed Comprehensive Plan and Title 18 revisions, remains the Preferred Alternative.

The corrected DSEIS, together with this FSEIS and its appendices, constitutes the City's final supplemental environmental impact statement for the City of Sequim 2025 Comprehensive Plan Update and associated amendments to Title 18 of the Sequim Municipal Code. Future site-specific development proposals will remain subject to applicable federal, state, and local regulations, permitting requirements, and project-level environmental review, as appropriate, consistent with the phased review provisions of WAC 197-11-060(5).

7 Appendix A: DSEIS Submitted Comment Letters

Nicholas Waters

From: Judith Pasco <pasco@olypen.com>
Sent: Monday, July 20, 2026 3:46 PM
To: Planning Department
Subject: Sequim draft SEIS comments

[You don't often get email from pasco@olypen.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

EXTERNAL SENDER: This email originated outside the organization. Do not click links or open attachments unless you verify the sender and know the content is safe.

1. The water situation among Home Estates, Cherry Blossom and Aspen Creek continues to concern me. We were led to believe that the 200+ new houses along S. 7th would not affect our water pressure, but it has. The water usage in the Lennar development is huge as more and more houses are built and the landscaping itself requires so much water. We have been assured that in the next 2-3 years, providing funding is available, this will be be corrected. As I see it, funding must be made a priority.

2. We are already seeing much more traffic on Silberhorn and 7th, and cars coming out of the Lennar development. Where 7th Ave. right angles into Silberhorn has become a dangerous intersection and needs to be addressed with either stop signs or a roundabout.

3. The draft mentions availability of housing on wide income levels, but the houses being build at Lennar, are not low-cost. Houses are out of reach for much of the population.

4. The draft mentions alternative transportation modes (Pingo i.e.) but most are not available south of the highway or for people under 80, or for people who don't have issues boarding a bus .

5. The draft is very lengthy, so I may have missed it, but no mention is made of the shortage of medical professionals for newcomers (many have to drive to Silverdale or Bremerton, or worse, Seattle) to get care.
There is also a shortage of veterinarians...there are waiting lists.
Because our demographic is largely senior citizens, should we be encouraging them to come here knowing that they will encounter such difficulties? With the influx of housing and the density that these developments have, shortages just get worse and worse.

6. Sequim is indeed an attractive place for retirees. However, continuing to build without thinking of the problems, and without foreseeing that Sequim itself will lose its identity, is a mistake. The new development proposal close to the Marina is a case in point.
Certainly not low income, an extreme use of resources, and increasing traffic in a beautiful, pristine area. It would be a great loss to Sequim identity.

7. Before allowing building, the environmental impact must be closely reviewed. The Lennar development took down a forest home to many animals and birds. As we greatly respect that this was tribal land before, it would show more respect for that land if permissions to build on it were denied more than they were approved.

Respectfully,

Judith Pasco

CITY OF SEQUIM

Draft Comprehensive Plan Online Public Comment Form

Received via Online Comment Form: https://forms.office.com/g/1tE6j3e7Lp

Comment #: 26 + DSEIS Comment

Comment Received On: 08/03/26

Submitted By: Anne Soule

Email: annsoule@olympus.net

Comment(s):

General comment: there is a conflict between promotion of water conservation as indicated in several goals and policies, and maximizing revenue also indicated in several goals and policies - since revenue for the water utility is based on how much is used. I urge the City to indicate a specific policy in the Comp Plan prioritizing water conservation over generation of revenue - at least during August and September when drought has been officially declared.

Specific suggestions in ALL CAPS:

Groundwater Protection section, page 27 and Utilities section, page 64:
Policy LU-12.3 and Policy UT-1.8 (equivalent)
Develop and implement a proactive water use efficiency and conservation program, based upon the goals and recommendations set forth in the most current water system plan.
[ADD "..., CLIMATE AND SUSTAINABILITY STUDIES, AND OTHER RELEVANT CITY REPORTS." I SUGGEST THIS BECAUSE THE LATEST WATER SYSTEM PLAN CONSERVATION POLICIES FOLLOW STATE GUIDELINES BUT DO NOT ADDRESS ACTUAL REDUCTION OF WATER SUPPLIED TO THE WATERSHED AND ITS AQUIFERS BY MOUNTAIN SNOWMELT AND GLACIERS - AN ISSUE INDICATED IN THE NATURAL RESOURCES SECTION/EXHIBIT CR-3 ON PAGE 107 AS WELL AS 10.2.1 Water Resources SECTION ON PAGE 111.]

Aquifer Recharge section, Bottom of page 92: "ground water" should be "groundwater" and "digression" should be "degradation"

Climate Resiliency section, bottom of page 111:
10.2.1 Water Resources
As regional precipitation patterns shift and mountain snowpack is reduced, the City should plan for more variable and extreme conditions affecting local water supply. A climate-resilient future includes management of water resources through conservation, reuse, stormwater integration, and sustainable landscaping practices.
[ADD "AND WORKING COOPERATIVELY WITH WATER RESOURCE PARTNERS IN THE DUNGENESS WATERSHED."]

Policy CR-1.2 , page 112
Manage water resources sustainably by integrating effective stormwater practices, preventative system maintenance, water conservation measures, increased reclaimed water
use, climate-appropriate plant selection, and responsible landscape management.
[INCLUDE ABOVE SUGGESTION HERE AS WELL]

Thank you for all your hard work!
Ann Soule
Retired city water resource analyst/planner