



**TO:** Planning Commission  
**FROM:** Zach Trevino, Assistant Planner  
**MEETING DATE:** May 10, 2023  
**RE:** 2023 Comprehensive Plan Amendment Application No. 23-26  
**APPLICANT:** City of Port Angeles Department of Community and Economic Development  
**LOCATION:** Citywide  
**REQUEST:** Annual amendment to the City of Port Angeles Comprehensive Plan to meet the requirements of the Washington State Growth Management Act.

---

### **EXECUTIVE SUMMARY AND BACKGROUND**

The City of Port Angeles adheres to an annual amendment cycle for the Port Angeles Comprehensive Plan. All proposed amendments to the Comprehensive Plan are considered concurrently on an annual basis from July 1st through June 30th and can be adopted no more than once during this period, except those amendments conforming to the Washington State Growth Management Act (GMA) may also be adopted whenever an emergency exists. Comprehensive Plan amendment proposals must be submitted no later than March 31<sup>st</sup>. The City did not receive any amendment proposals from the public.

The Comprehensive Plan was last amended in 2019. The 2019 Amended Comprehensive Plan was adopted by the City Council on June 18, 2019 through Ordinance No. 3621. Since that adoption the City has undertaken a process to adopt a Climate Resiliency Plan (CRP) and Climate Resilience Implementation Plan (CRIP) in 2022. Two major code amendments focusing on attainable housing were also adopted by the City Council in 2021 and 2022 through Ordinance Nos. 3688 and 3710. The purpose of this Comprehensive Plan amendment proposal is to incorporate those changes into the Comprehensive Plan.

### **BACKGROUND – CLIMATE RESILIENCY**

The CRP was adopted in June of 2022, following a public process to obtain input from stakeholders and the community. A project kick-off meeting occurred in January of 2021 involving City staff, City Council Climate Action Subcommittee members, Planning Commission Climate Action Planning Group (CAPG) members, a volunteer member of the CAPG, and the Clallam County Internal Climate Taskforce Leader. A Greenhouse Gas Inventory and Public Outreach Plan were

adopted in coordination with City staff, Planning Commission, the Council Climate Action Subcommittee, and CAPG volunteer input. Staff also led the Planning Commission in a Climate Action SWOT analysis of each Comprehensive Plan element. Two virtual community workshops were held to facilitate the CRP's development.

The adoption of the CRP was followed by a stakeholder input process to facilitate implementation of the CRP. Five implementation planning working sessions were held in July of 2022 to coordinate implementation of the CRP with stakeholders and local partner agencies. The working sessions informed the preparation of a draft implementation plan by City staff and Cascadia Consulting Group. This implementation planning process culminated in the adoption of a CRP Implementation Plan in November of 2022.

Beginning in August of 2022, the City participated in the Climate Pilot Program with the Washington State Department of Commerce. The program was intended to identify climate resiliency goals and policies from the CRP for integration into the Comprehensive Plan to ensure consistency between the CRP and the City's future actions. A special meeting of the Planning Commission was held on February 8, 2023 to inform the Planning Commission of the progress made through the City's participation in the Climate Pilot Program, identify next steps in the Climate Resiliency – Comprehensive Plan integration process, and obtain feedback on draft policies. The culmination of the pilot program in March of 2023 resulted in identifying goals and policies to integrate into the Comprehensive Plan.

### **BACKGROUND – ATTAINABLE HOUSING**

In the 2021-22 Strategic Plan, City Council established housing and homelessness as a priority issue of critical importance for the City of Port Angeles. The City acknowledged that every Port Angeles resident should have a safe and affordable place to live. Achieving this requires the City to focus on facilitating the production of a variety of housing units. In December 2021, the City Council approved amendments concentrated on necessary updates to the building, environmental, subdivision, and zoning provisions in Titles 14, 15, 16 and 17 of the Port Angeles Municipal Code (PAMC). In July of 2022, the Planning Commission began discussion of changes to Title 17 PAMC in order eliminate potential barriers to housing construction and continue providing diverse housing types in targeted zones. This discussion became the Pursuing Housing for All 2023 Port Angeles Municipal Code Amendment process. A public outreach effort for the project occurred between January and March of 2023. The effort included a public workshop, online survey, public hearing, presentations to community stakeholder groups, and local outreach opportunities to solicit public input. The Planning Commission recommended approval of Municipal Code Amendment No. 23-01 on February 22, 2023. The City Council approved the amendment on March 21, 2023 through Ordinance No. 3710. This amendment changed the residential density standards in multiple zones and expanded the permitted structure types to promote a range of

infill housing. The changes to density standards adopted through Ordinance No. 3710 warrant an update of the land use categories in the Land Use Element of the Comprehensive Plan to ensure consistency between the PAMC and Comprehensive Plan.

### **2023 COMPREHENSIVE PLAN AMENDMENT PROCESS**

An amendment to the Port Angeles Comprehensive Plan was proposed on March 31, 2023. A Planning Commission working session was held on April 12, 2023 to review requirements of the GMA for local comprehensive planning. Staff used the guidance received during the Climate Pilot Program to prepare a draft document integrating climate resiliency goals and policies into the Comprehensive Plan. The proposed amendments incorporate climate resiliency into the Plan and update descriptions of land use categories in the Land Use Element to reflect the amendments to Title 17 of the Port Angeles Municipal Code approved in March of 2023.

### **PROPOSED COMPREHENSIVE PLAN AMENDMENTS**

The proposed 2023 Comprehensive Plan Amendment incorporates changes to every element of the Plan except the Growth Management Element. This section contains an overview of the proposed changes by chapter. The complete text of the proposed changes are contained in Appendix A.

#### **Chapter 1 - Introduction**

- Proposed amendments to Chapter 1 are limited to correcting minor grammatical and spelling errors. No substantial changes to this Chapter are proposed.

#### **Chapter 3 – Land Use**

- Proposed amendments to Chapter 3 include updating the descriptions of land use categories and incorporating goals and policies that facilitate climate resiliency.
- The maximum density of the Low Density Residential land use category is being increased from 6 units per acre to 25 units per acre consistent with the allowable density of 1 unit per 1,750 square feet in the R7 zone established through Ordinance No. 3710. The category is also being amended to accommodate additional residential structure types.
- The maximum density of the Medium Density Residential land use category is being eliminated and the minimum density raised from 4 units per acre to 8 units per acre.
- The maximum density of the High Density Residential land use category is being eliminated and the minimum density raised from 10 units per acre to 12 units per acre.
- Three new General Land Use goals and associated policies are proposed to be added to the Land Use element. Existing Residential Goal G-3B is proposed to be amended and an additional policy added. One new Residential goal and associated policy are proposed to be added to the Land Use element. Existing Commercial Goal G-3H and associated policy

P-3H.07 are proposed to be amended. One new Commercial goal and associated policies are proposed to be added to the Land Use element. Two new policies are proposed to be added to existing Open Space Goal G-3K. Three new Open Space goals and associated policies are proposed to be added to the Land Use element.

#### **Chapter 4 – Transportation**

- Existing Transportation Goal G-4A is proposed to be amended and an additional policy added. Five new goals and associated policies are proposed to be added to the Transportation element.

#### **Chapter 5 – Utilities & Public Service**

- Three new goals and associated policies are proposed to be added to the Utilities & Public Service element.

#### **Chapter 6 – Housing**

- Existing Housing Policy P-6A.13 is proposed to be amended. Two additional policies are proposed to be added to existing Housing Goal G-6C.

#### **Chapter 7 – Conservation**

- Existing Conservation Policy P-7D.04 is proposed to be amended. Three new goals and associated policies are proposed to be added to the Conservation element.

#### **Chapter 8 – Capital Facilities**

- Existing Capital Facilities Policy P-8D.03 is proposed to be amended. Five new goals and associated policies are proposed to be added to the Capital Facilities element.

#### **Chapter 9 – Economic Development**

- One new goal and associated policies are proposed to be added to the Economic Development element.

#### **Chapter 10 – Parks & Recreation**

- One new goal and associated policies are proposed to be added to the Parks & Recreation element.

#### **Chapter 11 – Implementation**

- One new action is proposed to be added to the Implementation element.

### **Classification Typology**

DCED staff developed a typology to classify the proposed goal/policy additions and edits to the Port Angeles Comprehensive Plan outlined above, as follows:

**Type 1** – An existing goal/policy identified as applicable to an additional plan element. These goals/policies have been added to one or more elements to promote consistency, acknowledging that some goals/policies apply to multiple elements.

**Type 2** – A new goal/policy facilitates the implementation of the Climate Resiliency Plan. These goals/policies will help fulfill one or more actions identified in the CRP Implementation Plan.

**Type 3** – A new or amended goal/policy elaborates on existing goals/policies within the plan elements. Staff edited some existing goals/policies to reflect climate resiliency.

**Type 4** – A new or amended goal/policy added based on direction received from the Planning Commission and the public. During the public input opportunities for the CRP Implementation Plan and pilot program, the City received feedback on goal/policy language that promotes climate resiliency.

**Type 5** – A new or amended goal/policy promotes consistency between multiple elements within the Comprehensive Plan.

**Type 6** - A new or amended goal/policy promotes plan consistency with one or more other City plans (e.g., Housing Action Plan) or regulations (e.g., SEPA regulations). Sometimes, the City plan or policy is mentioned explicitly in the amended goal/policy. In other cases, the amended goal/policy would help facilitate the implementation of other City plans or policies not directly named in the amendment.

Staff used this typology to classify each change included in the draft amendment so it is apparent what each amended goal/policy accomplishes. Most of the proposed amendments are categorized under several types in Appendix A.

### **PROCEDURE**

On April 21, 2023, the Planning Division submitted its 60-day notice of intent to amend the City's Comprehensive Plan to the Washington State Department of Commerce (WSDOC). Section 18.04.040 PAMC states that the Planning Commission shall conduct a public hearing to consider the Amendment prior to or during May and City Council public hearings shall be conducted prior to or during June. The City Council's decision shall be rendered no later than June 30th. This codified timeline meets the requirements of the WSDOC. Notice of the application was provided on the following dates and in the following manner:

1. 4/21/2023: Notice to WSDOC of Intent to Amend the Comprehensive Plan
2. 5/1/2023: City of Port Angeles Website
3. 5/1/2023: City Hall Notice Board
4. 5/3/2023: *Peninsula Daily News*

### **COMMENTS**

The public comment period closes on June 10, 2023. No public comment has yet been submitted for the proposal as of the publishing of this staff report on May 5, 2023. The public will have an opportunity to provide verbal testimony at the Planning Commission public hearing on May 10, 2023 and the City Council public hearing on June 6, 2023. The public may also submit written comment to the Department of Community and Economic Development (DCED) before the end of the comment period. All comments received before the comment deadline will be reflected in the Planning Commission meeting minutes or added to the project record.

### **FINDINGS OF FACT & STAFF ANALYSIS**

Analysis and findings of fact from DCED Staff are based on the entirety of the application materials, Port Angeles Municipal Code (PAMC), applicable standards, plans, public comment, and all other materials available during the review period. Collectively the information contained in the staff report is the record of the review. The findings and analysis section this report is a summary of the review completed by DCED Staff.

### **Port Angeles Municipal Code**

Section 18.04.040 - Annual amendment cycle.

All proposed amendments to the Comprehensive Plan shall be considered concurrently on an annual basis from July 1st through June 30th and shall be adopted no more than once during said period, except that amendments conforming to the GMA may also be adopted whenever an emergency exists. Amendment proposals should be submitted, public hearings will be conducted, and action shall be taken, in accordance with the following schedule:

- A. Comprehensive Plan amendment proposals shall be submitted no later than March 31st;  
*Staff Analysis: The Comprehensive Plan amendment proposal was submitted prior to March 31, 2023 and was discussed in the months prior as the City participated in the Washington State Department of Commerce Climate Pilot Program.*
- B. The Washington State Department of Community, Trade and Economic Development (CTED) shall be notified of Comprehensive Plan amendment proposals no later than May 1st;  
*Staff Analysis: DCED staff provided notice to the Washington State Department of Commerce on April 21, 2023.*

- C. Planning Commission hearings will be conducted prior to or during May;

*Staff Analysis: A Planning Commission public hearing is scheduled for May 10, 2023.*

- D. City Council hearings will be conducted prior to or during June;

*Staff Analysis: A City Council public hearing is scheduled for June 6, 2023*

- E. The City Council's decision shall be rendered no later than June 30th and shall be transmitted to CTED within ten days after final adoption.

*Staff Analysis: A City Council Decision is scheduled for June 20, 2023.*

Section 18.04.060 - Comprehensive Plan amendment elements.

Comprehensive Plan amendments shall address the following elements:

- A. Demonstration of why existing Comprehensive Plan provision(s) should not continue in effect;

*Staff Analysis: The proposed amendment is incorporating goals & policies of the Climate Resiliency Plan into the Comprehensive Plan. The proposal integrates new policies that do not directly replace or conflict with existing goals and policies. Existing Comprehensive Plan provisions will remain in effect, but some will be amended to ensure Comprehensive Plan consistency with the PAMC and CRP.*

- B. Demonstration of how the amendment complies with the Growth Management Act's goals and specific requirements;

*Staff Analysis: Proposed changes are not in conflict with the Plan's current compliance with the Growth Management Act. They are meant to ensure that the Comprehensive Plan reflects climate resiliency and housing issues facing the City over the next 20 years while facilitating development consistent with the intent of the Port Angeles Urban Growth Area.*

- C. Demonstration of how the amendment complies with the County-wide planning policies;

*Staff Analysis: Proposed changes are not in conflict with the Plan's current compliance with planning policies applicable within Clallam County. The amendment will facilitate City practices that are more sustainable, reduce environmental impacts, reduce waste, and promote regional economic and environmental resilience. This will benefit the region beyond the City of Port Angeles in addition to allowing the City to achieve resilience.*

- D. Demonstration of how the amendment is consistent with the Capital Facilities Plan and the comprehensive services and facilities plans;

*Staff Analysis: The proposed amendments include policies that will facilitate the provision of urban services and improvement of facilities in a manner consistent with the CRP and other City plans. The Plan poses no conflict with the City's Capital Facilities Plan. It does propose changes to city operations that will make them more sustainable, cost effective, consider long range effects, reduce environmental impacts, reduce waste, and promote regional and environmental resilience.*

- E. Demonstration of how the amendment is in the public interest and is consistent with the public health, safety and welfare;

*Staff Analysis: Proposed changes continue support of the public interest and seek to improve public health, safety, and welfare by providing policy guidance to promote climate resiliency, reduce environmental impacts, reduce waste, and promote the provision of attainable housing.*

- F. Consideration of the cumulative effect of all proposed Comprehensive Plan amendments.

*Staff Analysis: The cumulative effect of the proposed amendment is a Plan that better prioritizes sustainable City development and better directs the City Council in its efforts to improve and manage the City of Port Angeles for the benefit of all its residents and the environment.*

18.04.080 - Comprehensive Plan amendment public hearings and notice.

- A. Public hearings on Comprehensive Plan amendments shall be conducted by the Planning Commission and the City Council in accordance with the schedule set forth in PAMC 18.04.040.

*Staff Analysis: Public Hearings will be held on May 10, 2023 in front of the Planning Commission and June 6, 2023 in front of the City Council.*

- B. Notice of public hearings on Comprehensive Plan amendments shall be provided in the same manner as set forth in PAMC 17.96.140 for public hearings required pursuant to the Zoning Code.

*Staff Analysis: Notice has been provided via the City Website, City Notice board, and in the Peninsula Daily News in accordance with notice requirements established in the PAMC.*

18.04.090 - Comprehensive Plan amendment decisions.

- A. The Planning Commission shall make a recommendation to the City Council on all Comprehensive Plan amendments.



*Staff Analysis: Staff has incorporated suggested edits from the Planning Commission and recommends that the Planning Commission recommend approval of the 2023 Comprehensive Plan Amendments on May 10, 2023.*

- B. The City Council shall make the final decision on all Comprehensive Plan amendments. The Council's decision shall be supported by written findings and conclusions, which shall address the elements set forth in PAMC 18.04.060.

*Staff Analysis: The City Council will make a final decision regarding the 2023 Comprehensive Plan Amendment on June 6, 2023 or at a continued public hearing on June 20, 2023.*

### **Environmental Review**

This project was reviewed under the Washington State SEPA threshold determination rules requirements and procedures. A Determination of Non-significance (DNS) is anticipated for this action. In accordance with WAC 197-11-340 a 14-day appeal period will begin on the date of the determination. The SEPA checklist and environmental documents are on file at the City of Port Angeles Department of Community and Economic Development Planning Division and are available upon request.

### **Consistency**

In preparation and submission of a Comprehensive Plan Amendment application, City Staff has demonstrated that all standards will be met in accordance with the Port Angeles Municipal Code and RCW 36.70a.

### **RECOMMENDATION**

It is the recommendation of Department of Community and Economic Development Staff that the Planning Commission concur with staff's recommendation to the City Council to approve Comprehensive Plan Amendment No. 23-26. This recommendation is based on the staff report, the 2022 Climate Resiliency Plan, 2019 Housing Needs Assessment, Municipal Code Amendment Ordinance Nos. 3688 and 3710, and submitted comments and public input. Staff has provided the following two recommendations options for the Planning Commission's consideration:

1. Recommend approval of the 2023 Annual Comprehensive Plan Amendment with final suggested changes provided by motion to be included in the recommendation to City Council along with any minor changes based upon continued public comment and staff input, citing Appendices A through G referenced in this report; or
2. Recommend approval of the 2023 Annual Comprehensive Plan Amendment (Application No. 23-26) to City Council with any minor changes based upon continued public comment and staff input, citing Appendices A through G referenced in this report.

**Appendices**

[Appendix A: Draft 2023 Port Angeles Comprehensive Plan Amendments](#)

[Appendix B: Comprehensive Plan Appendices](#)

[Appendix C: Port Angeles Climate Resiliency Plan](#)

[Appendix D: Port Angeles Climate Resiliency Implementation Plan](#)

[Appendix E: Port Angeles Climate Resilience Discussion Guide](#)

[Appendix F: Resilience Planning Spreadsheet](#)

[Appendix G: February 8, 2023 Planning Commission Special Meeting Minutes](#)