CITY OF SEQUIM
152 West Cedar Street Sequim, WA 98382
City Hall (360) 683-4139 FAX (360) 681-3448
Public Works (360) 683-4908 FAX (360) 681-0552

DEPARTMENT OF COMMUNITY DEVELOPMENT
HEARING EXAMINER
Staff Report
BSP-24-001 / CUP-24-001 / SEPA-24-001

To: Hearing Examiner
From: Travis Simmons, Senior Planner
Subject: Habitat for Humanity Binding Site Plan, Conditional Use Permit, and SEPA Review – Public Hearing (Applications BSP-24-001 / CUP-24-001 / SEPA-24-001)
Date: May 22, 2025

Staff respectfully recommends approval of the Habitat for Humanity Binding Site Plan (BSP-24-001), Conditional Use Permit (CUP-24-001), and SEPA Review (SEPA-24-001), subject to the conditions listed in this report.

TABLE OF CONTENTS:

Pg 2. Project Summary
Pg 6. Project Timeline
Pg 6. Public Comments
Pg 6. Project and Site Features
Pg 7. Applicable Standards
Pg 7. Staff Discussion
Pg 30. Consistency with Comprehensive Plan
Pg 30. SEPA Review
Pg 31. Staff Recommendation
Pg 32. Conditions of Approval with Signatures

1. PROJECT SUMMARY

PROJECT NO.(S)	BSP-24-001 / CUP-24-001 / SEPA-24-001
OWNER / APPLICANT / PROJECT LEAD	Habitat for Humanity Clallam County / Colleen Robinson / Tyrell Bradley
PROJECT NAME	Sequim Avenue Binding Site Plan
PROJECT DESCRIPTION	The Sequim Avenue Development project is a proposed 48-unit residential development located in the City of Sequim, at the intersection of East Brownfield Road and South Sequim Avenue. The project site consists of a single parcel (Parcel No. 033029229020), encompassing approximately 6.52 acres and zoned Residential R4-8. The site is owned by Clallam County Habitat for Humanity as part of a land trust. The development will feature eight fourplex townhomes, two triplex townhomes, and five duplex townhomes. In addition to the residential units, the project will include the construction of drive aisles, drainage facilities, a playground, and utility infrastructure for water and sewer. Frontage improvements along South Sequim Avenue and East Brownfield Road are also planned as part of the project.
STAFF REPORT DATE	5/15/2025
DATE OF HEARING	5/22/2025
EXHIBITS	1. Code Consistency Table 2. Binding Site Plan Application 3. ACUP Application 4. SEPA Packet 5. Preliminary Plan Set 6. Preliminary Stormwater Drainage Report 7. A. Traffic Impact Analysis Prepared by Heath and Associates, September 20, 2023 B. Transpo TIA Comments, February 10, 2025 8. A. Critical Areas Report, March 5, 2025 B. Washington State Ecology Peer Review C. Building Setback Clarification 9. Determination of Completeness 10. Title Report 11. A. Elevations B. Applicant Elevations Memo 12. Noticing Packet 13. Public Comments 14. Cultural Resource Survey Any documents, ordinance, statute, law or reference to case law, or other article referenced herein shall be incorporated by reference into this record.
SEPA DETERMINATION	April 25, 2025 MDNS, SEPA Record #202501752
STAFF CONTACT	Travis Simmons, Senior Planner – (360) 681-3438 tsimmons@sequimwa.gov
STAFF RECOMMENDATION	Approval with conditions.
REVIEW AUTHORITY	

This is a type C-2 quasi-judicial process under the Sequim Municipal Code Title 20.01.030(B)(2). The Hearing Examiner is responsible for conducting hearings on and adjudicating quasi-judicial cases involving a variety of complex land use and regulatory compliance issues, and other issues which the city council may designate to the Hearing Examiner by ordinance or resolution. The Hearing Examiner must issue decisions or recommendations based on relevant ordinances, regulations, policies, statutes, and other authorities within ten (10) days of the publicly noticed hearing.

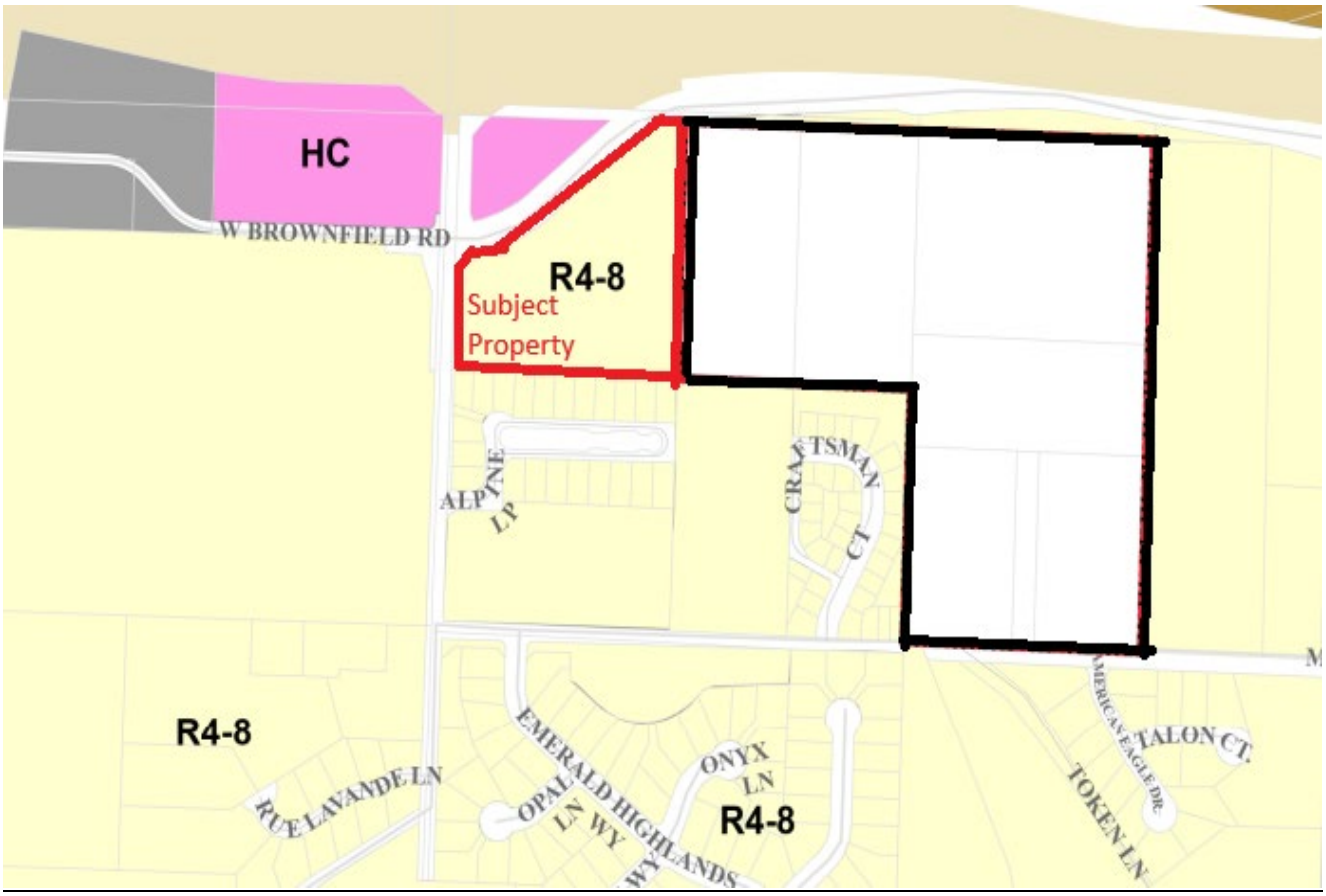
The Hearing Examiner may approve, deny, or approve with conditions, modifications, and restrictions as the Hearing Examiner finds necessary to make the application compatible with its environment, the comprehensive plan, other official policies, objectives, and land use regulatory enactments.

1.A.) PROJECT LOCATION:

FIGURE 1 & 2

ZONING / COMP. PLAN DESIGNATION

Zoning Map



Comprehensive Plan Future Land Use Map

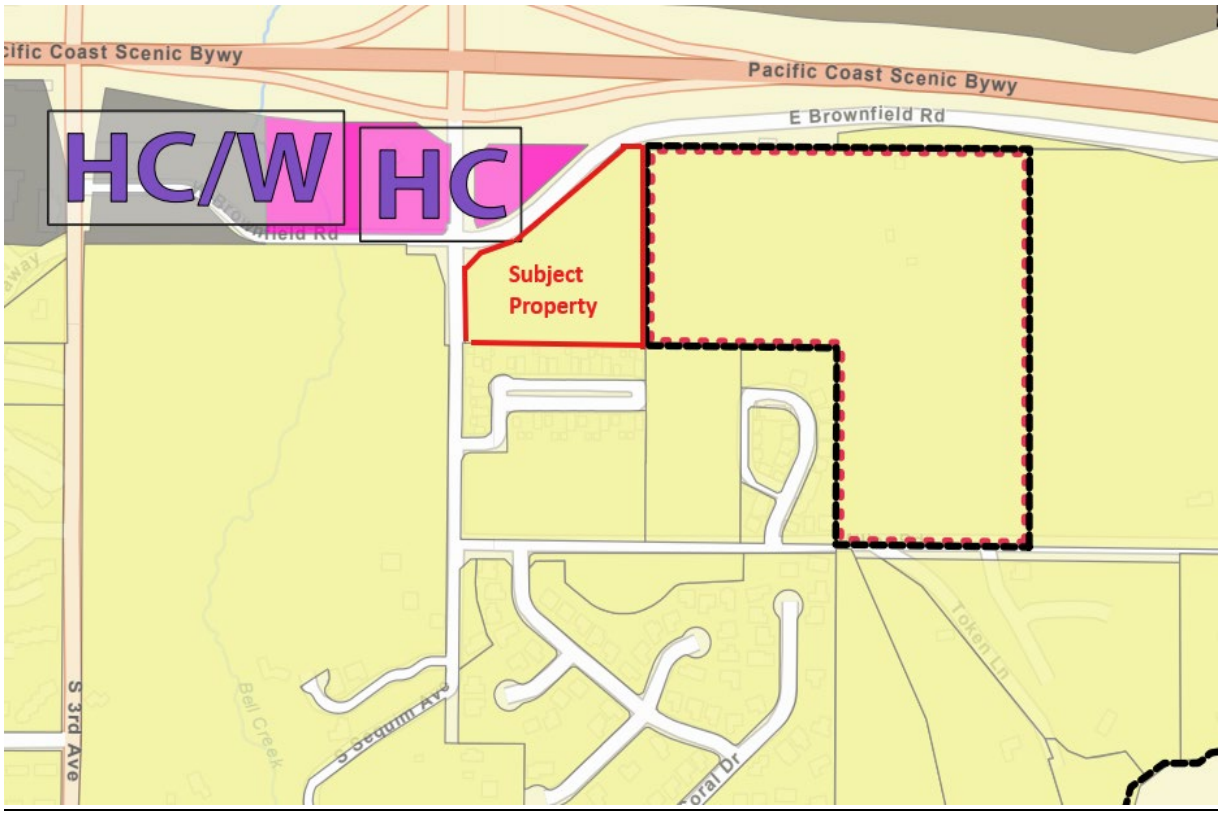


FIGURE 3

PRELIMINARY PLANS

Preliminary Landscape Plan– taken from Attachment 5



2.PROJECT TIMELINE

21-October, 2024: Submitted application

29-October, 2024: Notified applicant of incomplete application

30-October, 2024: Resubmitted for completeness check

4-November, 2024: Notified applicant the application is complete

8-November, 2024: Notice of Application and ODNS issued

27-November, 2024: First review letter sent to applicant requesting revisions

6-March, 2025: Applicant resubmitted with requested revisions

25-April, 2025: SEPA Determination issued

7-May, **2025**: Notice of Public Hearing issued

22-May, 2025: Public Hearing before Hearing Examiner

3. PUBLIC COMMENTS

3.A.) COMMENTS, LETTERS & KEY ISSUES

Olympic Region Clean Air Agency: November 12, 2024
Department of Ecology: November 26, 2024
Resident Comment #1: November 26, 2024
Jamestown S'Klallam Tribe: May 9, 2025
Resident Comment #2: May 12, 2025
Department of Archaeology and Historic Preservation (DAHP): May 13, 2025

As part of the public notice and environmental review process, agencies and residents were invited to submit comments on the proposal. The following comments were received during the comment period:

The Washington State Department of Ecology emphasized proper removal and disposal of hazardous materials during demolition, erosion control to prevent stormwater pollution, and the need for a Construction Stormwater General Permit. The Olympic Region Clean Air Agency (ORCAA) noted that an air permit may be required if an emergency generator is installed and provided guidance on dust control during construction. One neighbor requested a 4-foot fence along the shared property line to prevent access near their electric farm fence. Another neighbor expressed concern about the project encroaching onto their property. Jamestown S'Klallam Tribe requested an Inadvertent Discovery Plan and DAHP required a permit before ground disturbing activity. (See Exhibit 13 for full comments.)

4. PROJECT SITE

LOCATION	Currently Unaddressed
PARCEL	033029229020
ZONING	Residential 4-8 units per acre (R4-8)
ADJACENT ZONING	North: Highway Commercial (HC) South: R4-8 East: Sequim Urban Residential II (S(R-II) per *Clallam County Zoning* West: R4-8
COMPREHENSIVE PLAN DESIGNATION	Low Density Residential
STREET DESIGNATION	East Brownfield Rd. – Collector street in current TMP South Sequim Ave – Proposed Collector street in current TMP Internal Unnamed Street – Neighborhood street

BACKGROUND

The project site is a 4.83-acre parcel located within the City of Sequim's R4-8 zoning district. It is proposed for development as a 48-unit affordable housing community by Habitat for Humanity.

The site is predominantly flat, with a gentle slope that trends northwest toward the wetland area, creating a natural drainage pattern across the property. This subtle grade change directs surface water flow toward the low point where the wetland is located, while the majority of the site remains level and well-suited for development with minimal grading.

Historically, the property was used for agricultural purposes, likely as pasture or hay production, consistent with former rural uses in this part of Sequim. The site has remained an open field and here is no significant tree canopy.

A **Critical Areas Report** prepared by Land Services Northwest identifies a **Category IV wetland** in the northwest corner of the site. The wetland carries a standard 25-foot buffer under SMC 18.80. The report classifies the wetland as low-functioning with a habitat score of 14. Civil plans submitted with the application show the wetland boundary and buffer relative to proposed buildings and roads. The site's physical features support clustered residential development while retaining required protections for critical areas. A SEPA Mitigated Determination of Nonsignificance was issued for this project April 25, 2025.

5. APPLICABLE STANDARD

5.A.) CODE CONSISTENCY TABLE EXPLANATION:

This table summarizes the project's compliance with applicable municipal code requirements and can be found in Exhibit 1. Items marked as *Complete* reflect procedural steps that have been fulfilled, with associated conditions listed in the Conditions of Approval. Items noted as *Not Applicable* do not pertain to this proposal. For those marked *Consistent with Standards*, staff have determined that the project

meets the relevant code requirements. Items involving specific development standards, criteria, or discretionary considerations are further discussed in the Staff Discussion sections, where staff explain the basis for the consistency determination.

6. STAFF DISCUSSION / ANALYSIS & FINDINGS AND CONCLUSIONS

6.A.) SMC 16.04 ENVIRONMENTAL POLICY

SMC 16.04.090 Environmental Checklist

Code Requirement:

A completed environmental checklist, using the form provided in WAC 197-11-960, must be submitted at the time of application for a permit or approval, unless exempted or when SEPA compliance has already been addressed. The City uses the checklist to determine the lead agency, identify the responsible official, and make a SEPA threshold determination.

Staff Discussion:

The applicant submitted a completed SEPA environmental checklist with the project application, meeting the submittal requirement of SMC 16.04.090. The City of Sequim has determined it is the lead agency for SEPA review of this proposal. The checklist provided sufficient information for the responsible official to proceed with a threshold determination. All procedural steps required under SEPA rules, including checklist filing and lead agency confirmation, have been properly followed.

SMC 16.04.100 Mitigated DNS

The responsible official may issue a mitigated Determination of Nonsignificance (DNS) when conditions or applicant-proposed changes sufficiently mitigate identified impacts. The code outlines:

A. Authority to Issue a Mitigated DNS

Code Requirement:

The responsible official may issue a mitigated Determination of Nonsignificance (DNS) when conditions or applicant-proposed changes sufficiently mitigate identified impacts.

Staff Discussion:

The responsible official issued a mitigated Determination of Nonsignificance (DNS) after reviewing the SEPA checklist and supporting documentation and identified potential environmental impacts associated with the project. Mitigation measures have been imposed as conditions of approval to reduce these impacts to a non-significant level. These include but are not limited to erosion and sediment control best management practices, compliance with the Western Washington Stormwater Manual, and submittal of a final grading plan prior to ground disturbance. Dust suppression and construction hour limits will minimize air quality and noise impacts. The project must comply with cultural resource protection protocols, including coordination with the Washington Department of Archaeology and Historic Preservation and the Jamestown S'Klallam Tribe.

B. Early Notice Request

Code Requirement:

An applicant may request in writing early notice of whether a Determination of Significance (DS) is likely under WAC 197-11-350.

Staff Discussion:
The applicant did not submit a written request for early notice regarding the likelihood of a DS.

C. Response Timeline for Early Notice
Code Requirement:
The responsible official should respond to an early notice request within 15 working days.
Staff Discussion:
No early notice request was submitted by the applicant; therefore, no written response was required or issued.

D. Assistance with Mitigation Measures
Code Requirement:
The city should assist the applicant in identifying impacts and potential mitigation measures, as much as possible.
Staff Discussion:
City staff coordinated with the applicant throughout the SEPA review process to identify appropriate mitigation strategies that address project impacts. Staff provided guidance on erosion control and stormwater requirements, and measures to protect habitat and cultural resources. These mitigations were incorporated into the environmental review to ensure the project meets City and state standards.

E. Changed or Clarified Proposals
Code Requirement:
If the applicant submits a changed or clarified proposal and revised environmental checklist, the city must base its threshold determination on the updated proposal and should make the determination within 15 days.
Staff Discussion:
The applicant's proposal remained unchanged. The mitigated DNS was issued based on the original environmental checklist and the mitigation measures identified through staff review.

F. Comment Period and Public Notice
Code Requirement:
A mitigated DNS requires a 15-day comment period and public notice under WAC 197-11-340(2).
Staff Discussion:
The mitigated DNS was issued with the required 15-day public comment period and notice, consistent with WAC 197-11-340(2).

G. Enforceability of Mitigation Measures
Code Requirement:
Mitigation measures in the mitigated DNS are deemed conditions of approval and may be enforced like any permit condition.
Staff Discussion:
The mitigation measures are listed in the mitigated DNS and included in the project's conditions of approval to ensure enforceability.

H. Consistency Between Mitigated DNS and Permit Decision

Code Requirement:

If the city's permit decision omits mitigation measures from the mitigated DNS, it must reevaluate the threshold determination for consistency.

Staff Discussion:

Staff has confirmed that all mitigation conditions from the mitigated DNS are incorporated into the tentative permit decision to maintain consistency and enforceability.

I. Preliminary Discussions and Early Notice Limitations

Code Requirement:

Preliminary discussions or early notice responses do not constitute a determination of significance or bind the city's final threshold determination.

Staff Discussion:

All preliminary discussions were procedural and did not constitute a final determination. The formal mitigated DNS issued represents the city's threshold determination.

Staff Finding #1: Based on review of the SEPA environmental checklist, applicable provisions of SMC 16.04, and the project file, Staff find that the City of Sequim has properly followed required environmental review procedures. A mitigated Determination of Nonsignificance (MDNS) was appropriately issued, incorporating both standard construction best management practices (BMPs). All mitigation measures identified in the MDNS have been carried forward into the tentative permit decision to ensure enforceability and consistency with SEPA requirements. Therefore, staff concludes that the project satisfies the city's environmental policy standards and that potential environmental impacts have been adequately addressed through mitigation.

6.B.) SMC 17.24 BINDING SITE PLANS

SMC 17.24.090 Design regulations

A. Conformance with Comprehensive Plan and Zoning Regulations

Code Requirement:

Each use of the land resulting from the adoption of the binding site plan must conform with the comprehensive plan and zoning regulations, including lot coverage, setbacks, building heights, off-street parking requirements, landscaping buffering, and permitted uses within zoning districts.

Staff Discussion:

The proposed development is located within the R4-8 zoning district, which permits low-density residential uses, including attached units up to fourplexes, in alignment with the Comprehensive Plan's Land Use Goal 3.2. This goal encourages a variety of housing types consistent with low-density residential development.

All relevant requirements related to lot coverage, setbacks, building heights, off-street parking, landscaping, buffering, and permitted uses within the zoning district are addressed in Section 6.C. (Zoning, Land Use, Density) of this report.

B. Adequate Circulation and Connection

Code Requirement:

Adequate provisions for on- and off-site circulation and connection with the surrounding road network

must be proposed, consistent with adopted city standards.

Staff Discussion:

Currently, the proposed submittal does not meet the minimum 125' spacing between intersections of all existing and proposed streets, including pipeline projects. Bell Creek Preliminary Plat and development recently approved through the Hearing Examiner (parcel west adjacent to the subject parcel) appears to conflict with the southern approach/intersection being proposed by the proposed application. The two streets will intersect South Sequim Ave. at less than 125' apart. This situation is addressed as a condition of approval #19, which requires the applicant to resolve this issue at the time of site construction permit. All other pedestrian, vehicle, and multi modal circulation appears to be compliant with all City requirements.

Due to the proximity of the Bell Creek subdivision to the west, the TIA was reviewed for the need to install a center/left turn lane for the subject development. The City's traffic consultant Transpo confirmed in Exhibit 7.B. that a center turn lane was deemed not necessary for the proposed increased level of traffic from either development, including the existing traffic conditions.

C. Installation of Infrastructure and Utilities

Code Requirement:

Curb, gutter, sidewalk, trail connections, transit stops, streets, storm drainage, sanitary sewer lines, water lines, and other utilities will be installed at the expense of the applicant. These installations must meet city specifications and applicable ordinances. The city engineer must certify or approve the proposed plans for construction.

Staff Discussion:

Streets, curb, gutter and sidewalk, and utilities will be installed by the applicant and to City engineering construction standards. The City Engineer will review and approve site construction permit final engineering drawings to ensure compliance. As part of the sanitary sewer system, the project is proposing a grinder pump system; however the City Public Works will not own and operate this type of system. Currently the City operates four sewer lift stations: two are submersible pumps (WILO-EMU), one dry well pump (CORNELL), and one vacuum pump (SMITH & LOVELESS). Three of these lift stations were installed by developers, and one by the City. City staff are not trained nor have experience with the operation and maintenance of grinder pumps. Condition of Approval #20 establishes that the proposed grinder pump system will not be owned and maintained by the City and will remain in private ownership and operation.

D. Easements for Municipal Utilities

Code Requirement:

The applicant must provide, if necessary, easements to the city to accommodate the establishment of municipal utilities.

Staff Discussion:

Any utilities (City and non-City), including stormwater, not shown in the public right of way shall be detailed in a recorded tract or easement for preliminary and final plat.

E. Dedication of Private Property for Public Use

Code Requirement:

Private property necessary for public use as street rights-of-way must be dedicated to the city by an acceptable deed of dedication or by preparing a plat to be recorded.

Staff Discussion:

The applicant has proposed a roadway tract of sufficient size that will be dedication as public right-of-way.

F. Bond for Unconstructed Improvements

Code Requirement:

A bond meeting city requirements (Chapter 3.78 SMC) must be posted to ensure completion of those unconstructed improvements required consistent with the criteria found in this chapter.

Staff Discussion:

The applicant has not yet posted a bond to ensure the completion of unconstructed improvements. A condition of approval is included to require the applicant to post a bond that meets the city's requirements as outlined in Chapter 3.78 SMC before the issuance of the site construction permit.

G. Provision of Adequate Public Facilities

Code Requirement:

Adequate public facilities must be provided as required by the adopted capital facilities plan. These facilities may include, but are not necessarily limited to, parks, playgrounds, schools, open spaces, transit stops, and trails and trail connections.

Staff Discussion:

The proposed development includes several provisions for public facilities. The applicant will pay park impact fees at the time of building permit, and at then-current rates, to contribute to the City's park system. The infrastructure provided with the project includes streets, stormwater management systems, and utility connections, with provisions for water, sewer, and drainage. These improvements align with the city's infrastructure needs, ensuring adequate support for the development and its residents. The City does not require school impact fees.

H. Compliance with Environmentally Sensitive Areas and SEPA

Code Requirement:

All requirements of the environmentally sensitive areas and wetlands sections of the SMC and the State Environmental Policy Act (SEPA) must be met.

Staff Discussion:

The requirements for environmentally sensitive areas and wetlands are addressed in Section 6.I. of the staff report. The applicant has completed a thorough review of the site to ensure compliance with the relevant sections of the SMC. This includes identifying and mitigating any potential impacts on environmentally sensitive areas. See Staff Report Sections 6A and 8 on SEPA compliance.

I. Floodplain and Flood Hazard Mitigation

Code Requirement:

No development can occur which causes a flooding hazard, and until any development occurring within an identified floodplain has been properly mitigated.

Staff Discussion:

The proposed development site has been reviewed for floodplain hazards and is not located within a designated floodplain. As such, no flood hazard mitigation measures are required for this project.

J. Public Interest

Code Requirement:

The public interest will be served by the proposal.

Staff Discussion:

The proposed development serves the public interest by adding much-needed housing options to the local market, helping to address the community's housing demand. Public improvements along South Sequim Ave and East Brownfield Rd will enhance these existing streets, providing benefits to both the new residents and current community members who utilize these roads.

K. Compliance with RCW 58.17

Code Requirement:

All the requirements of Chapter 58.17 RCW must be met.

Staff Discussion:

By following the requirements outlined in SMC Titles 17, 18 and 20, this is determined to meet and be consistent with Chapter 58.17 RCW and all of its applicable requirements

L. Project Phasing Schedules

Code Requirement:

All proposed project phasing schedules must meet the requirements contained in SMC 17.20.090.

Staff Discussion:

No phasing plan has been proposed for this project. As such, the entire development is intended to be completed in one phase. Without a development agreement, any portion of the project subject to preliminary approval will need to submit for final plat within three years of that approval unless an extension(s) are approved per SMC 20.01A.030.

Staff Finding #2: Based on the analysis provided in Sections A through L above, the proposed Habitat for Humanity development application is consistent with the applicable Binding Site Plan design regulations of SMC 17.24.090. The project conforms to Comprehensive Plan goals and zoning standards for the R4-8 district, addresses circulation requirements with conditions to resolve street spacing, and provides necessary infrastructure and utilities subject to standard conditions of approval. Public facilities are incorporated into the design, and all environmentally sensitive area protections and SEPA requirements have been met. No floodplain impacts are identified, and the project is found to serve the public interest by contributing to housing supply and improving public infrastructure. Compliance with Chapter 58.17 RCW and city regulations is confirmed, and no phasing is proposed, meaning the project will proceed as a single-phase development in accordance with subdivision timing rules.

6.C.) SMC 18.20 ZONING, LAND USE, DENSITY

SMC 18.20.030 Permitted use definitions for zone Tables 18.20.040 through 18.20.150

Code Requirement:

“Residence, attached” means multiple dwelling units physically attached to other dwelling units in one or more structures. Types of attached residences include apartments, townhouses, duplexes, two-unit homes, triplexes, three-unit homes, condominium buildings, and all structure types that have two or

more dwelling units, regardless of whether owner-occupied or rented (SMC 18.20.030).

Staff Discussion:

The applicant's proposed project includes duplexes, triplexes, and fourplexes, all of which consist of multiple dwelling units physically attached within a single structure. These housing types meet the zoning code's definition of "Residence, attached" in SMC 18.20.030, which applies to any structure type with two or more dwelling units, such as duplexes, triplexes and fourplexes. Therefore, the proposal satisfies the code's criteria for attached residential use.

18.20.050 Residential R4-8 zone table

Staff Discussion*:* The subject property is zoned Residential R4-8, with a Future Land Use Designation of Low-Density Residential (LDR). Per SMC 18.20.050, the R4-8 zoning district is intended to provide land for residential development while ensuring consistency and predictability in the character of residential neighborhoods. The zoning standards require a minimum residential density of four dwelling units per net acre for new subdivisions. The Low-Density Residential (LDR) designation aligns with the intent of the R4-8 zoning, emphasizing the development of neighborhoods that maintain Sequim's small-town character. This designation supports a variety of housing types, including single-family and small multi-family dwellings.

The proposed project has been evaluated for compliance with the following development standards of SMC chapter 18.20.050 to ensure alignment with City zoning regulations, neighborhood character, and orderly residential development in accordance with the Comprehensive Plan and Sequim Municipal Code.

Standard	Code Requirement (R4-8 Zone)	Proposed Project Compliance
Permitted Use	Duplex, Triplex, Fourplex (Attached residences ≤ four units)	8 fourplexes, 2 triplexes, and 5 duplexes (all permitted types)
Minimum Lot Size	Duplex: 9,000 sq ft, Triplex: 10,500 sq ft, and Fourplex: 12,000 sq ft	5,920 sq ft per unit avg; parcel is 6.52 acres (pre-existing); density and avg lot size consistent
Density	Min. 4 units/net acre and Max. 8 units/net acre	7.36 units per net acre (compliant)
Maximum Height	25 ft	24.6 ft max ridge (compliant)
Minimum Front Yard Setback	15 ft	15 ft provided
Minimum Side Yard Setback	6 ft	6 ft provided
Minimum Rear Yard Setback	15 ft	15 ft provided
Maximum Lot Coverage	50% for attached units	Complies; lot coverage within zoning limits at 41.2 %.
Required Parking	2 spaces per unit	2 spaces per unit provided
Site Requirements	Binding Site Plan and ACUP review required (SMC 18.60)	Site plan under review; process followed per code

<u>Staff Finding #3:</u> The proposed development, consisting of duplexes, triplexes, and fourplex townhomes, is consistent with the Low-Density Residential (LDR) Future Land Use Designation and complies with the intent and development standards of the R4-8 zoning district as outlined in SMC 18.20.050. The project meets density requirements, lot size standards, setbacks, height limitations, parking requirements, and

lot coverage restrictions, ensuring compatibility with the surrounding residential neighborhood. The proposed housing types align with the goal of providing a variety of residential options while maintaining Sequim's small-town character, walkability, and safe, well-planned neighborhoods as envisioned in the Comprehensive Plan.

6.D.) SMC 18.22 DEVELOPMENT STANDARDS

SMC 18.22.030 Sidewalks

Code Requirement:

A. Sidewalks to Be Constructed in Commercial and Mixed-Use Districts. If the street grade has been previously approved by the public works director, or if the curbs and gutters are currently in place along the access road abutting the subject property, then any new construction or remodel of the primary structure of that property for all uses permitted within any commercial or mixed-use district shall require the property owner to provide and fully develop sidewalks along the entire frontage of the subject property in compliance with the sidewalk construction standards of this chapter prior to issuance of a building permit for said construction.

B. Minimum Sidewalk Development Standards. Sidewalks shall be established consistent with adopted City of Sequim Streetscape Standards. The standards contained within SMC Title 17, Subdivisions, and the Public Works Handbook and/or to match existing adjacent sidewalks. Where sidewalk depths are inconsistent, a transition area shall be provided to avoid hazardous conditions.

Staff Discussion:

The proposed development includes new sidewalk construction along the entire property frontage on South Sequim Avenue and East Brownfield Road, ensuring pedestrian connectivity in accordance with city standards. Additionally, sidewalks are planned on both sides of the new internal roadway tract and in front of every residential unit, providing safe and accessible pedestrian routes throughout the subdivision. These improvements align with the intent of the City's sidewalk development standards and will enhance walkability within the neighborhood.

SMC 18.22.040 Grading, tree retention and general site repair

Code Requirement:

Where reasonable and practicable, all development will be designed in a manner which maintains existing natural features and grade, preserves the full use of neighboring properties (i.e., existing and potential structures, parking pads, driveways, roads, etc.), significant trees and/or other landscape features, and restores features damaged during development consistent with Comprehensive Plan Policies EE 9.5.4 and EE 9.6.1 through EE 9.6.5.

Staff Discussion:

The proposed development does not impact any existing significant trees or other major natural features, ensuring alignment with the intent of this section. Additionally, open space areas will remain undisturbed except where necessary for infrastructure improvements.

A retaining wall is proposed along the southern parcel boundary, which will require engineering due to surcharge load considerations. The design will be prepared by a licensed engineer to ensure stability and compliance with the City's requirements for surcharge loads, topography considerations, and preservation of neighboring property use. The proposed development integrates these measures to maintain neighborhood integrity while accommodating necessary site grading.

SMC 18.22.060 Multifamily residential

A. Orientation

Code Requirement:

Orientation. Multifamily developments shall be designed to orient to public or private streets and to provide pedestrian and vehicular connections to existing nearby neighborhoods.

Staff Discussion:

The proposed development meets the orientation standards by incorporating a modified street grid that connects South Sequim Avenue and East Brownfield Road. All units front onto the roadway tract, which primarily serves on-site traffic. Each unit has individual driveways providing direct pedestrian access to sidewalks and streets, ensuring connectivity within the development and to surrounding neighborhoods. This design aligns with the code's intent to integrate multifamily developments with existing infrastructure in a pedestrian-friendly manner.

B. Off-Street Parking

Code Requirement:

Impacts associated with multifamily dwellings can be reduced by providing adequate on-site parking and by designing and locating parking lots, carports, and garages to support the residential qualities of the neighborhood consistent with comprehensive plan policies.

Staff Discussion:

Parking for the development is provided through individual driveways and garages, ensuring each unit meets the required two parking spaces. Due to site constraints and road access, locating parking behind or beneath buildings is not practical. Parking is distributed throughout the site with no large parking lots, and it is oriented interior to the lot to minimize visual impact on surrounding streets and developments. Landscaping is incorporated around driveways to enhance aesthetics and soften the development's appearance. Since the project does not abut single-family zoning, screening requirements do not apply. Additionally, standards related to parking adjacent to street frontage, separation from circulation routes, and ADA-compliant parking lots are not applicable to this development.

C. Resident Services

Code Requirement:

Resident Services. New development and redevelopment shall have adequate provisions for residential services including mailboxes, garbage and recycling pickup, transit stops, and walkways and parking area lighting.

Staff Discussion:

The proposed development includes a comprehensive pedestrian network, with sidewalks along South Sequim Avenue, East Brownfield Road, both sides of the new roadway tract, and in front of each unit, ensuring safe pedestrian access to residential services. Street lighting is included along walkways and around the playground area, though additional conditions will be required to ensure fixtures are downward-facing and shielded to minimize glare. Trash and recycling storage is accommodated within each unit's garage, meeting typical residential screening standards. While no sidewalk connections are available to the north along East Brownfield Road, the proposed sidewalk along South Sequim Avenue will extend southward, linking the development to the Alpine Loop neighborhood, enhancing pedestrian connectivity.

D. Open Space and Recreation
Code Requirement:
Open Space and Recreation. These standards are for privately owned open spaces and recreational areas only and shall not be dedicated to the city. General city off-site park requirements are met through the payment of park impact fees as adopted by the city council. Usable open space and recreation areas within developments shall be required within multifamily residential developments containing five or more dwelling units.
Staff Discussion: The requirements outlined in **SMC 18.22.060 Multifamily Residential** are fully addressed within the staff discussion for **SMC 18.26 Multiplex Residential Units – Development and Design Standards** in Staff Report Section 6.E. Rather than duplicating the analysis, refer to that section for a comprehensive discussion on how the proposed development complies with the applicable standards.

E. Modulation of Building Facades, Staggering Entries, and Roofing
Code Requirement:
See Chapter 18.24 SMC (Design Standards) for detailed standards.
Staff Discussion: The design standards outlined in SMC 18.24 are superseded by the more applicable requirements of SMC 18.26 Multiplex Residential Units – Development and Design Standards for this project. As a result, compliance with modulation, entry staggering, and roofing design is reviewed under SMC 18.26, Staff Report Section 6.E. No further analysis under SMC 18.24 is warranted.

F. Landscaping
Code Requirement:
Landscaping within a project shall have a common design theme that takes into account the existing scale and style or landscaping found in surrounding development patterns.
Staff Discussion: The proposed multifamily development meets landscaping requirements by providing landscaping between driveways and surrounding the buildings, with street trees along internal roadways and between the buildings and the street. This design enhances the streetscape and visually separates the buildings from the pavement.

Staff Finding #4:
The proposed development demonstrates consistency with the applicable provisions of SMC 18.22. Sidewalks will be constructed along the full frontage of South Sequim Avenue and East Brownfield Road, as well as on both sides of the internal roadway tract, ensuring pedestrian connectivity in alignment with city standards. Grading activities have been designed to avoid disturbance of significant natural features, with minimal impacts limited to infrastructure installation and a proposed retaining wall along the southern boundary engineered for stability.

The site is oriented to both South Sequim Avenue and East Brownfield Road through a modified internal street grid, providing direct pedestrian and vehicular connections to surrounding neighborhoods. Parking is addressed through individual driveways and garages, dispersed to minimize visual impacts while maintaining a residential character. Resident services, including pedestrian lighting and screened waste storage, are adequately provided. The landscaping plan contributes to neighborhood compatibility through street trees, landscaped buffers, and consistent design themes, with maintenance provisions included. Overall, the project meets the city's multifamily design standards and supports Sequim's goals for walkable, well-integrated residential development while minimizing impacts to surrounding natural and built environments.

6.E.) SMC 18.26 MULTIPLEX RESIDENTIAL UNITS – DEVELOPMENT AND DESIGN STANDARDS

SMC 18.26.020 Multiplex development & design standards in the R4-8 zoning district

A. Allowed Uses and Minimum Lot Sizes

Code Requirement:

Multiplex residential development dwellings are allowed as a limited use on a single parcel/lot not smaller than 9,000 square feet for a duplex, 10,500 square feet for a triplex, and 12,000 square feet for fourplex units by approval of an administrative conditional use permit (ACUP). Multiplex projects with two or more buildings must provide at least the same developed area per each building type.

Staff Discussion:

The proposed development consists of 48 multiplex units across a 6.52-acre (284,011.2 sq. ft.) site. The project includes 8 fourplexes, 2 triplexes, and 5 duplexes. Each unit type must be located on a lot of no less than 9,000 sq. ft. for a duplex, 10,500 sq. ft. for a triplex, and 12,000 sq. ft. for a fourplex. The total required area for the proposed unit mix is 162,000 sq. ft. (3.72 acres), while the total provided site area is 284,011.2 sq. ft. (6.52 acres). This indicates compliance with the minimum lot size standards.

B. Open Space Requirements

Code Requirement:

Multiplex developments must provide open space in accordance with the following standards:

i. For individual buildings that are not part of a larger development plan, open space may be provided through the establishment of individual yards for each unit. This includes as applicable duplexes, triplexes, and fourplexes.

ii. For multiplex projects with more than one building, in any configuration, shared or common usable open space must be provided in addition to any other open spaces or protected areas. Shared or common usable open spaces must include landscaped areas and active or passive recreation opportunities for the residents.

iii. Minimum Area Required. Each multiplex project with two or more buildings must provide a minimum of 200 square feet of usable open space for each dwelling unit in the project.

iv. Play Space for Children. Multiplex projects with two or more buildings that are anticipated by their type and anticipated residency to accommodate families must provide a safe play space for children. Projects that are established solely for the occupancy of adults are not required to establish play spaces. Such uses may be congregate care facilities, senior-only (over 55) housing developments, and adults-only developments, as permitted by law.

v. The provision of usable open space, play spaces, and/or recreational spaces within a multiplex project with two or more buildings may be phased concurrent with the approval of a phasing plan consistent with the requirements of this code. Each phase must include usable open space and play spaces (if required) established in proportion to the size and impacts of each phase.

Staff Discussion:

The proposed multiplex development includes 48 dwelling units, requiring 9,600 square feet of usable open space. The site plan exceeds this requirement by providing 33,120 square feet of dedicated open space. As the project consists of multiple buildings, shared or common usable open space is required,

which is met through landscaped areas and designated recreation spaces per the civil and landscape plans.

A 1,950-square-foot children's play area is provided, meeting all applicable requirements. The grading plan ensures a level surface with a slope no greater than four percent. The play space is appropriately located outside of driveways, parking areas, required landscaping, porches, and balconies, with a minimum ten-foot setback from roads, driveways, alleys, parking areas, and adjacent single-family residential uses. Pedestrian walkways connect the play area, and lighting is incorporated for visibility and safety. A note on the plans confirms that all equipment will comply with the safety standards of the American Play Equipment Industry.

C. Multiplex Front Façade Modulation
Code Requirement:
At least two of the following architectural design features must be utilized to create variety in architectural massing:

i. Modulated facade with intervals no wider than 24 feet
ii. Angled facets such as bay windows or covered entrances
iii. Changes in materials, trim bands, or projections for multistory buildings
iv. Garage and front entry door placement avoiding mirror-image designs

Staff Discussion:
The proposed multiplex development incorporates two required facade modulation features to ensure architectural variety and compatibility with surrounding single-family homes. The selected features include modulated building facades with intervals no wider than 24 feet, each with a minimum two-foot offset, and between-story differentiation through material changes, trim bands, or recesses/projections of at least two feet.

All duplexes incorporate a change in material and color separated by a continuous horizontal trim band. The triplex and fourplex buildings also use facade intervals but differentiate between stories by incorporating a horizontal trim band and recessing the second floor above the garage rather than changing colors. These techniques effectively break up building massing, enhance visual interest, and meet the intent of the code. See Exhibit 5 and 14 for architectural building elevations and discussion.

D. Multiplex Entrance Design
Code Requirement:
Multiple entrances visible from the street must include at least two of the following:

i. Covered porches
ii. Distinct wall materials in entryways
iii. Varied entry designs (porch roof, balustrade, doors, colors, etc.)
iv. Front entry doors oriented differently from adjacent units

Staff Discussion:
The proposed multiplex development includes multiple units with street-visible entrances, requiring at least two entrance design features. The applicant has met this standard by incorporating covered

porches for all structures, ensuring a defined and inviting entryway. Additionally, each unit features a distinct door color and varied siding colors, providing differentiation between individual units. These features enhance the pedestrian experience by creating architectural interest. The proposed design successfully meets the entrance treatment requirements.

E. Setbacks, Lot Coverage, and Other Design Standards

Code Requirement:

Multiplex structures in the R4-8 zone must comply with the setbacks, lot coverage, and other design requirements established in SMC 18.20.050.

Staff Discussion:

The proposed multiplex development is subject to the setbacks, lot coverage, and design requirements outlined in SMC 18.20.050 for the R4-8 zoning district. The civil plans indicate a proposed lot coverage of 41.2%, which is within the maximum allowable 50%. Additionally, the project complies with all required front, side, and rear setbacks per the zoning code.

F. Roof Pitch Requirements

Code Requirement:

Multiplex buildings must have a roof pitch of no less than 4:12, covering at least 65% of the structure.

Staff Discussion:

The building elevations indicate that the fourplexes and triplexes have a 4:12 roof pitch, while the duplexes have a steeper 5:12 roof pitch, which exceeds the minimum requirement. All proposed buildings meet or exceed this standard, ensuring compliance.

G. Roof Length Requirements

Code Requirement:

For multiplexes exceeding one story, no ridgeline can be greater than 24 feet in length without a five-foot vertical or sloped offset creating a new ridgeline.

Staff Discussion:

Option B of the fourplex elevations found in Exhibit 11 A, demonstrates compliance with the roof ridgeline standard, showing the longest ridgeline at 17 feet 5.5 inches—well below the 24-foot maximum. Additionally, a new ridgeline measuring 14 feet 5 and 1/16 inches wide has been introduced, with a vertical offset of 6 feet 4 inches, exceeding the minimum five-foot requirement. These design features effectively break up the roofline, ensuring architectural variation and compliance with the standard. Although the triplex elevations do not depict this roof form, the applicant's memo (see Exhibit 11 B) confirms that the same Option B ridgeline treatment will be applied to the triplex units. Based on the submitted plans and the applicant's confirmation, the project meets the roof length and offset requirements.

H. Front-Forward Garage Design

Code Requirement:

Structures with garages placed forward of the living portion of the dwellings must contain window openings on the front facade, not including openings into the garage, equal to no less than one-half (50 percent) of the surface area of the garage doors.

Staff Discussion:

This standard is not applicable to the proposed design. The garage is positioned to the side and is slightly

recessed relative to the primary living area, and therefore is not considered a front-forward garage under this section. As such, the window-to-garage ratio requirement does not apply. The placement supports a streetscape that prioritizes the residential character of the facade and reduces the visual prominence of the garage.

I. Single-Family Appearance for Multiplex Structures

Code Requirement:

Multiplex structures must be designed to resemble single-family homes, particularly on corner lots. This can be achieved through height limits, entryway grouping, multi-pitched rooflines, and street-facing window openings.

Staff Discussion:

The building elevations confirm that the corner-lot multiplex buildings incorporate multi-pitched rooflines and street-facing window openings, reinforcing a single-family residential character. Additionally, the building height is 22.1 feet, which is below the maximum allowed height of 25 feet for residential structures in the R4-8 zone. These design elements ensure compatibility with surrounding single-family homes and maintain a cohesive neighborhood aesthetic.

J. Building Lot Coverage

Code Requirement:

The maximum lot coverage for multiplex residential structures cannot exceed 50 percent.

Staff Discussion:

The submitted civil plans indicate a proposed lot coverage of 41.2%, which is within the maximum allowed 50% coverage. This ensures that the development maintains appropriate building-to-open-space ratios, preserving outdoor areas and aligning with zoning requirements for the district. Based on the submitted site plans, the project meets the lot coverage standard.

Staff Finding #5:

The project includes a mix of duplexes, triplexes, and fourplexes across a 6.52-acre site, resulting in 5,879 square feet per unit, consequentially exceeding the minimum lot size requirements for anyone structure. It provides over three times the required amount of open space, including a children's play area that meets all safety, design, and placement standards. Architectural modulation and entrance design requirements are met through varied materials, covered porches, and differentiated entries that promote visual interest and compatibility with the surrounding neighborhood. The development adheres to roof pitch and ridgeline requirements, with all structures incorporating multi-pitched roofs and appropriate offsets. Design standards for front-forward garages are not applicable. The proposed lot coverage of 41.2% is within the 50% maximum, preserving open space and supporting a low-density residential character. Based on the submitted materials and Staff's review, the project meets all applicable development standards for multiplex residential structures.

6.F.) SMC 18.48 OFF-STREET PARKING

SMC 18.48.050 Minimum number of spaces required

Code Requirements:
SMC 18.48.050 establishes off-street parking requirements for residential projects. The parking requirements for residential uses are:

i. Single-family detached/attached, duplexes, triplexes and fourplexes: two spaces/unit.

ii. Multifamily (five or more units): one and one-half spaces/unit.

iii. Mobile home parks: two spaces/unit.

iv. Group facilities: one space/three beds.

Off-street parking must be provided on-site, and on-street parking cannot be counted toward these requirements (SMC 18.48.050(A)). Parking areas must comply with size and design standards, and for projects with more than 20 spaces, up to 20% may be designated as compact spaces (SMC 18.48.050(B)(7)).

Staff Discussion:
The project consists of a mix of duplexes, triplexes, and fourplexes, each subject to the requirement of two spaces per unit under SMC 18.48.050(B)(1)(a). Staff has reviewed the submitted site plan and confirmed that the proposed parking supply meets or exceeds this minimum standard, providing two spaces per dwelling unit. Parking is accommodated through a combination of garages, private driveways, and shared surface parking areas within the site. No reliance on on-street parking is proposed or permitted, consistent with SMC 18.48.050(A).

SMC 18.48.090 Access and driveway approach regulations from streets and alleys – Driveway entrances required – Driveway standards

Code Requirements:
SMC 18.48.090 regulates driveway access and design standards for residential projects. For residential uses, the following standards apply:

C. Residential: Single-Family/Duplex/Triplex.

i. Limit to one access frontage.

ii. Limit driveway access to arterials or major collectors.

iii. Maximum 20-foot width or one-half of lot width, whichever is less.

iv. Use two-foot flares at approach.

b. Access must be to lowest street category for corner lots.

In addition:

All driveways on public property must be cement concrete driveways (SMC 18.48.090(E)).

Driveway approaches must be clearly defined through landscaping (SMC 18.48.090(A)(3)).

Driveways into multifamily residential projects must align with existing or future driveways on the opposite side of the street where left turns are allowed (SMC 18.48.090(A)(4)).

Staff Discussion:
The project proposes internal private drive aisles that access duplex, triplex, and fourplex units. Consistent with SMC 18.48.090(C)(1)(a), each residential unit is limited to one access frontage. No driveways exceed the maximum 20-foot width standard for smaller residential types (SMC 18.48.090(C)(1)(c)), and this compliance is also conditioned for verification and enforcement.

Driveway approaches are shown with landscape areas on either side to clearly define the entrances, satisfying SMC 18.48.090(A)(3). Internal drives also provide safe pedestrian crossings and ensure that vehicles can fully enter the site before encountering cross-traffic, aligning with the general standards in SMC 18.48.090(A)(5) and (B)(5).

While SMC 18.48.090 groups duplexes and triplexes under the small residential driveway standards, staff finds it appropriate to also include fourplexes in this category for this project. Per SMC 18.08 definitions, “multiplex residential” includes duplex (two units), triplex (three units), and quadruplex (four units) buildings. Additionally, “multifamily residential development” is defined as developments containing buildings with two or more residential dwelling units, including townhouses, duplexes, multiplexes, and apartments. Based on these definitions, and because the fourplex buildings function similarly in scale and access design to the duplexes and triplexes on site, staff applies the same driveway access standards.

Staff finds that the access and driveway design meet the applicable standards of SMC 18.48.090, subject to final verification during civil construction review and approval by the City Engineer, and as conditioned herein.

Staff Finding #6:
Staff finds that the proposed development complies with the off-street parking, loading, and access requirements of SMC Chapter 18.48. The project provides the required number of off-street parking spaces per unit type, including spaces for duplex, triplex, and fourplex buildings, in accordance with SMC 18.48.050. The access design avoids direct driveway connections to public streets, limiting each residential unit to one frontage and maintaining consistency with multifamily access standards in SMC 18.48.090. Driveway widths are conditioned to comply with code maximums, and site entrances incorporate landscaping and safe pedestrian crossings, satisfying applicable design standards. Compliance with all provisions will be subject to final verification during civil construction review and approval by the City Engineer.

6.H.) SMC 18.60 CONDITIONAL USE PERMIT

SMC 18.60.070

A. Use Compatibility

Code Requirement:

The use will not be materially detrimental to uses or property in the immediate vicinity of the subject property.

Staff Discussion:

As a low-density residential project consisting of duplexes, triplexes, and fourplexes, it maintains a compatible scale with the adjacent single-family homes to the south. The project includes appropriate setbacks, landscaping, and site design measures to minimize any potential impacts related to privacy, noise, or visual character. Additionally, infrastructure improvements such as sidewalks, street lighting, and adequate parking provisions will support safe and efficient circulation within the neighborhood. Overall, the project aligns with established zoning and land use policies, ensuring it does not create adverse effects on surrounding properties.

Applicant Response:

The proposed materials for the project will be Hardi siding with wood like accent panels. Paint colors will be earth tones with accent colors on the front doors. See renderings submitted as part of the submittal package (Exhibit 5). Roofing materials will be composition roofing. The building materials are consistent with the surrounding housing. The neighborhood to the south is similar in use. There is a retaining wall and associated 20-foot slope easement between the southern development and this proposed development that will remain as part of this project. A structural engineer will analyze/design the proposed retaining wall as part of this construction documents to confirm no impacts to the wall to the south will occur. Pedestrian amenities such as sidewalk and street lighting will be extended from the development to the south that will enhance the regions pedestrian connectivity.

B. Design Compatibility

Code Requirement:

The design is compatible with the existing or intended character, appearance, quality of development and physical characteristics of the subject property and immediate vicinity

Staff Discussion:

The proposed development is designed to be visually compatible with the surrounding area, incorporating materials and colors that reflect the character of nearby residential properties. The project consists of duplexes, triplexes, and fourplexes, which maintain a low-density residential pattern while offering a mix of housing types. This ensures that the development aligns with the scale and character of the neighboring single-family homes to the south. A retaining wall and associated slope easement create a defined transition between this development and the adjacent neighborhood, helping to mitigate visual and physical impacts.

Applicant Response:

See description under section A for the materiality and compatibility with the surrounding appearance and quality of development. The only housing adjacent to the development is directly to the south. The construction materials are Hardi and T1-11 siding with composition roofing. The proposed project will blend with the adjacent development.

C. Public Facilities

Code Requirement:

The use will be served by adequate public facilities including streets, fire protection and utilities.

Staff Discussion:

The proposed development will be connected to public utilities, including sewer, water, and power. Fire protection, refuse collection, and emergency response services are available to the site. The development will take access from existing public streets, which provide connectivity for residents and service providers. No known capacity issues have been identified for the public facilities serving this area.

Applicant Response:

The proposed development will be served by public utilities such as sewer, water, power, phone, and cable. The jurisdiction does have adequate capacity to service the development, including fire protection services, refuse collection, and emergency vehicle services.

D. Additional Provisions

Code Requirement:

Satisfactory provisions and conditions have been made concerning the following:

i. Ingress and egress to the property and proposed structures thereon with particular reference to automotive, bicycle, and pedestrian safety and convenience, traffic flow;
ii. Off-street parking and loading areas where required, with particular attention to subsection (D)(1) of this section;
iii. The noise, glare, or odor effects of the special use permit on surrounding properties;
iv. Refuse and service areas, with particular reference to location and screening;
v. Screening and buffering with reference to type, dimensions and character;
vi. Signs, if any, and proposed exterior lighting with reference to glare, traffic safety and compatibility with surrounding properties;
vii. Required yards and other common space;
viii. Any special requirements set forth in this SMC for the particular use involved.

Staff Discussion:

The proposed development provides vehicular ingress and egress through two access points—one from South Sequim Avenue and another from East Brownfield Road. The internal roadway layout includes a knuckle along a curve to facilitate emergency vehicle access and improve overall traffic flow. Pedestrian access is planned on both sides of the internal streets, aiming to reduce the need for mid-block crossings.

Off-street parking is provided at a ratio of two spaces per unit, totaling 96 spaces, with an additional 26 on-street parking stalls proposed along the northern and western portions of the project site.

The development consists solely of residential units and is not expected to generate significant noise, glare, or odors beyond typical residential use. Exterior lighting is planned at key locations along the front facade and will be directed downward to minimize glare and light pollution onto adjacent properties.

Refuse collection will be managed through individual roll-out bins stored in garages and placed at the curb for collection, consistent with standard residential practices.

Common open space is incorporated throughout the site, including a walking path around the townhouses on the north side of the internal road and the stormwater infiltration pond. Signage related to wetland buffers and elk habitat preservation is proposed around the perimeter of the wetland. These features contribute to the overall accessibility and livability of the development.

Applicant Response:

Please refer to Appendix A. Responses to all Conditional Use Permit review criteria

Staff Finding #7:

The proposed development aligns with the applicable zoning and land use standards, demonstrating compatibility with the surrounding properties. The low-density residential design, featuring duplexes, triplexes, and fourplexes, is consistent with the adjacent single-family homes and incorporates appropriate setbacks, landscaping, and site design to mitigate potential impacts related to privacy, noise, and visual character. Additionally, the development includes provisions for vehicular and pedestrian access, off-street parking, common open space, and environmental protections for the wetland and elk habitat. Based on these findings, staff recommends approval of the proposed development as it complies with the relevant regulations and is not anticipated to create adverse impacts on the surrounding properties or public services.

6.I.) SMC 18.80 CRITICAL AND ENVIRONMENTALLY SENSITIVE AREAS PROTECTION

SMC 18.80.045 Critical area review

Code Requirement:

The city must perform a critical area review for a development proposal permit application or other request to proceed with an alteration on a site that includes a critical area or is within an identified critical area buffer or building setback area. Any required studies must be conducted in conformance with SMC 18.80.060(C).

Staff Discussion:

A critical area was mapped on the Clallam County Multi-Purpose Map as a Category IV wetland. The wetland's type and nature, as confirmed by a wetland biologist, classify it as a Category IV wetland with a 25-foot buffer required. According to SMC 18.80.070, this buffer is in alignment with the applicable standards for Category IV wetlands.

The City's review confirms that a critical area special study was required. The wetland delineation was conducted by a certified wetland biologist, which meets the requirements of SMC 18.80.060(C) and is included as Exhibit 8.

Upon evaluating the submitted wetland delineation and other related documentation, the City determined that the proposed development is consistent with the chapter's requirements, particularly those related to wetland buffers and setbacks. However, the proposal involves encroachment into the 15-foot building setback area, which is subject to further review in Section (18.80.070.F).

SMC 18.80.050 Permitted Uses.

Code Requirement: Permitted Uses. Uses permitted on properties classified as critical areas must be the same as those permitted in the underlying zone. Each use must be evaluated in accordance with the review process required for the proposed use in the underlying zone in conjunction with the requirements of this chapter and state and federal regulations.

Staff Discussion:
As required by SMC 18.80.050, the permitted uses on the site are the same as those allowed in the underlying zoning district (R4-8), which is consistent with the provisions for residential development.

SMC 18.80.070.F (Wetlands) Development Standards
Code Requirement:
Wetland buffers are required for all regulated activities adjacent to regulated wetlands. Any wetland created, restored or enhanced as compensation for approved wetland alterations must also include the standard buffer required for the category of the created, restored or enhanced wetland. All buffers must be measured from the wetland boundary as surveyed in the field. The width of the wetland buffer zone must be determined according to wetland category, habitat score, and the intensity of the proposed land use. For the purposes of this section, "low impact land use" means land uses with low levels of human disturbance or low wetland habitat impacts, including, but not limited to, passive recreation, open space, educational field trips, small gardens, or low impact stormwater management facilities. A maximum net density of four dwelling units per acre is defined as low intensity. "Net density" means the density calculation after the land set aside for roads and wetlands (but not their buffers) has been removed from the total land associated with the proposed development. "High impact land use" means land uses associated with moderate or high levels of human or structural disturbance including but not limited to R4-8 conditional or special uses, R-III zoning and above, multifamily residential, active recreation, commercial and industrial land uses.
Staff Discussion:
A wetland (Wetland A) has been identified on the subject property and classified as a Category IV wetland in accordance with the Washington State Wetland Rating System. Pursuant to SMC 18.80.070(F5), a 25-foot buffer is required for Category IV wetlands. In order to be eligible for the buffer widths established in Table 18.80.070(F)(5), the applicant must meet a variety of performance standards. Here, the applicant has demonstrated compliance with the applicable performance standards for wetland buffers and adjacent development activities as outlined in SMC 18.80.070(F5).
The proposed site plan maintains the required 25-foot wetland buffer and 15-foot building setback from the buffer edge prescribed by SMC 18.80.070(F6). However, two triplexes and the playground are proposed to be minorly located within this adjacent 15-foot building setback in specific areas. This setback is required to provide additional protection from encroachment, structural overhangs, and indirect disturbances. According to SMC 18.80.070(F6), minor structural intrusions into the area of the building setback may be allowed if the intrusions will not negatively impact the wetland. If the wetland buffer is already heavily impacted, building setbacks may be reduced in exchange for buffer enhancement – see SMC 18.80.080. While the wetland buffer remains intact, the encroachment into the building setback necessitates further evaluation as SMC 18.80.070(F6) allows for building setbacks may be reduced in exchange for buffer enhancement under the exception criteria of 18.80.080.

Staff notes that no buffer averaging or buffer reduction is proposed. The wetland buffer will remain fully vegetated and protected.

SMC 18.80.080 Development exceptions

Code Requirement:

SMC 18.80.080(C) allows for development within previously altered critical areas or buffers under specific conditions. According to this section:

i. The critical area or buffer must have been lawfully altered in accordance with city ordinances and state/federal laws at the time of alteration (SMC 18.80.080(C)(1));
ii. The alteration must have significantly disrupted the natural functions of the critical area or buffer as determined by a qualified professional (SMC 18.80.080(C)(2));
iii. The proposal must utilize the best available construction, design, and development techniques to minimize adverse impacts, as determined by a qualified professional (SMC 18.80.080(C)(3));
iv. The proposal must incorporate the development standards of SMC 18.80.070 (SMC 18.80.080(C)(4));
v. The new development must not further degrade the critical area or buffer, as determined by a qualified professional (SMC 18.80.080(C)(5));
vi. The proposal must be consistent with the purpose and intent of Chapter 18.80 SMC (SMC 18.80.080(C)(6)); and
vii. The applicant must submit a mitigation and enhancement plan pursuant to SMC 18.80.060 (SMC 18.80.080(C)(7)).

Staff Discussion:

SMC 18.80.080 allows for development within previously altered critical areas or buffers under specific circumstances. The applicant's proposal includes encroachment into the building setback associated with a Category IV wetland, a portion of which has been altered by historic agricultural practices. These alterations, specifically ditching and haying, were conducted long ago, prior to current regulations, and were not in violation of any state or federal laws at the time. Under these conditions, the City's code permits development within the previously altered portion of the building setback in exchange for buffer enhancement.

The applicant has proposed a buffer enhancement and mitigation plan to support the requested encroachment into the building setback adjacent to a Category IV wetland. This plan includes enhancing an area of the wetland buffer at a more than a 1:1 ratio relative to the area impacted by development. Specifically, the enhancement involves removal of invasive species (e.g., Himalayan blackberry and reed canarygrass) and replanting with a diverse mix of native species suited to wetland buffer conditions. These plantings are intended to improve habitat structure, enhance stormwater filtration, and promote long-term buffer function.

In addition to vegetative enhancement, the applicant will conduct and submit annual monitoring for a minimum of five years to the City of Sequim as set forth in Condition of Approval #17C. Each monitoring report will document plant survival, percent cover, and overall buffer function, with a performance standard of at least 80% survival of installed plantings and effective control of invasive species as detailed in Exhibit 8.A.

As required by SMC 18.80.060.C, peer review was conducted by Washington State Department of Ecology Wetlands. The Department of Ecology confirms the wetland report and mitigation plan; email confirmation is included in Exhibit 8.B.

<u>Staff Finding 8:</u> Based on the review of the application and supporting materials, the proposed development complies with the relevant provisions of SMC 18.80, including the critical area review, development standards, and exception criteria. The wetland buffer will remain intact and the

necessary mitigation to allow the proposed encroachment into the 15-foot building setback area which was historically modified by agricultural activities were proposed.

Necessary mitigations have been identified to maintain the integrity of the wetland buffer, and the project complies with all applicable code provisions. Therefore, the proposal is consistent with the applicable regulations and will not result in significant adverse impacts on the critical area or its buffer.

6.J.) SMC 20.10 CONCURRENCY REVIEW

SMC 20.10.050 Concurrency standards and requirements

1. Pedestrian Safety LOS

Code Requirement:

Developments will provide for pedestrian safety, including adequate connections to existing pedestrian facilities. Proximity to pedestrian oriented establishments such as, but not limited to, schools, parks, and commercial establishments must be considered when evaluating pedestrian safety. Particular attention must be given to school walk routes.

Staff Discussion:

The proposed development includes new sidewalks with curb, gutter, and street lighting to enhance safety along the proposed sidewalks, though no such infrastructure currently exists in the surrounding area. The closest schools are over a mile away and require crossing Highway 101 via an overpass, while the nearest park is 0.6 miles away, also requiring crossing the highway via an overpass. Since this development is not along a school walking route and does not directly affect pedestrian access to these amenities, no additional improvements to these routes are required.

2. Bicycle Network LOS

Code Requirement:

Developments will provide for bicycle network connectivity, including adequate connections to the existing network.

Staff Discussion:

The project site is adjacent to existing bike lanes along the north parcel boundary along East Brownfield Road. These bike lanes are part of the City's established bicycle network, and the development does not propose any additional improvements to this network aside from the previously mentioned sidewalks. The site is also shown within the future bicycle network map in the City’s Transportation Master Plan, though the current infrastructure already supports bike lane connectivity.

The nearest park is approximately 0.6 miles away, and the nearest school is about a mile from the site, both requiring crossing Highway 101 as described above. While these destinations are within a reasonable biking distance, the existing bike lanes along East Brownfield Road provide adequate connectivity for cyclists. The development, therefore, maintains the City's current bicycle infrastructure and does not require any further enhancements to the network for the applicable frontage.

3. Traffic Capacity LOS

Code Requirement:

Capacity LOS is defined in the current edition of the Highway Capacity Manual and is based on peak hour

traffic during the most critical or highest volume times of the day. The street system, including segments and intersections.

Staff Discussion:

All intersections will continue to operate at pre-developed levels of service; therefore, no additional mitigations are required.

Staff Finding #9: ***The proposed development meets the concurrency standards outlined in SMC 20.10.050. Pedestrian safety is addressed through new sidewalks with curb, gutter, and street lighting, although the surrounding area lacks similar infrastructure. Since the development is not along a school walking route or directly affecting pedestrian access to nearby amenities, no additional improvements are required. Bicycle network connectivity is maintained through existing bike lanes along East Brownfield Road, and while future improvements are identified in the City's Transportation Master Plan, no additional bike infrastructure is proposed. Increased traffic due to development will not significantly decrease the level of service of the adjacent intersection(s) when compared to the existing condition. Therefore, the development complies with the City's concurrency requirements for pedestrian safety, bicycle network connectivity, and traffic capacity.***

7. CONSISTENCY WITH COMPREHENSIVE PLAN

7.A.) Land Use Goal 3.2

LU goal 3.2: Low-density residential: Maintain Sequim's "friendly, small-town" qualities by fostering the growth of low-density neighborhoods consisting of single and small multifamily neighborhoods that are social, walkable, and safe and provide a variety of housing types.

Discussion:

This project aligns with Sequim's goal of maintaining its "friendly, small-town" qualities by introducing a variety of low-density housing options, specifically duplexes, triplexes, and fourplexes. These housing types contribute to the growth of a socially connected, walkable, and safe neighborhood while preserving the character of Sequim's residential areas.

This project consists of 48 units developed over 6.52 acres, which directly complies with LU Goal 3.2. The preliminary plat shows a net density of approximately 7.36 units per acre, consistent with LU 3.2.3 of the comprehensive plan, which states the residential density range city-wide is 3 to 6 units per gross acre, equivalent to 4 to 8 units per net acre.

Staff Finding #10: Staff finds that the proposed project supports and advances Land Use Goal 3.2 of the Sequim Comprehensive Plan by contributing to the development of low-density neighborhoods that maintain the city's "friendly, small-town" character. The project's mix of duplexes, triplexes, and fourplexes introduces a range of housing types that strengthen neighborhood diversity while remaining consistent with the intended low-density form. With a net density of approximately 7.36 units per acre across 6.52 acres, the project fits within the Comprehensive Plan's targeted range of 4 to 8 units per net acre, as established in Policy LU 3.2.3.

8. STATE ENVIRONMENTAL POLICY ACT (SEPA)

A SEPA Checklist was submitted with the Habitat for Humanity application. The project was reviewed for probable adverse environmental impacts in accordance with state and local regulations. The City issued a Mitigated Determination of Nonsignificance (MDNS) on April 25, 2025, with the required 15-day comment and appeal period closing on May 14, 2025. Six comment letters were received during the Notice of Application and Optional DNS issuance, one from the Washington State Department of Ecology, one from the Olympic Region Clean Air Agency (ORCAA), one from the Jamestown S'Klallam Tribe, one from the Washington State Department of Archaeology and Historic Preservation (DAHP), and two from residents. No appeals were filed.

Following issuance of the MDNS, the applicant submitted a cultural resource study on May 12, 2025, in response to the request made by the Jamestown S'Klallam Tribe. This submittal has been added to the project record and was provided to the Tribe for their review.

All SEPA documentation, including the checklist, memo, threshold determination, and agency comments, are included in this record as Exhibit 4. The SEPA mitigation measures identified in the MDNS will be carried forward as conditions of approval for the project. No further SEPA comment period is required.

9. RECOMMENDATION

THEREFORE, after project review by City Staff including the City's: Department of Community Development and Public Works Department; the Director of Community Development finds the proposed development to be in conformance with the City of Sequim's zoning and regulatory requirements.

Binding Site Plan 24-001, CUP 24-001 and SEPA 24-001 are hereby **RECOMMENDED FOR APPROVAL** subject to the attached Conditions of Approval listed below.

SIGNED THIS DAY OF May 14, 2025.

Karla Boughton
Cross Sound Consulting
On behalf of
Kristina Nelson-Gross, Interim Director
Department of Community and Economic Development

REVIEW AUTHORITY: A Type C-2 decision is reviewed and approved by the Hearing Examiner. The Hearing Examiner is responsible for conducting hearings on and adjudicating quasi-judicial cases involving a variety of complex land use and regulatory compliance issues, and other issues which the city council may designate to the Hearing Examiner by ordinance or resolution. The Hearing Examiner must issue decisions or recommendations based on relevant ordinances, regulations, policies, statutes, and other authorities. See Section 2. Review Authority, for more details.

If you have any questions or need additional information, please contact the Department of Community and Economic Development, (360)683-4908.

10. CONDITIONS OF APPROVAL

DEPARTMENT OF COMMUNITY DEVELOPMENT CONDITIONS OF APPROVAL

1. The approval of this preliminary Binding Site Plan (BSP) shall expire three years from the date of approval unless a proposed final BSP is submitted to the City in proper form for review and approval prior to recording. The Hearing Examiner may grant up to two extensions of up to one year each, upon recommendation from the Planning Director. Any extension may be subject to additional review and conditions if determined necessary by the Hearing Examiner.

2. Required improvements of curbs, gutters and paving must be constructed consistent with City of Sequim Engineering standards for the street classifications outlined in this staff report.

3. All required easements must be clearly shown on the face of the final plat. See Condition #22 in regard to required 10' utility easement.

4. Final plat language must be consistent with adopted "Guidelines for Standard Land Use Certification, Dedication and Declaration Language", per SMC 17.04.040.

5. The applicant will coordinate with the U.S. Postal service for the provision of mailboxes, if necessary.

6. Any future signage will require separate review by the Department of Community and Economic Development per SMC 18.58, at which time it will be reviewed for compliance with the city's sign regulations.

7. All fire hydrants must satisfy the requirements of International Fire Code (IFC), specifically IFC Chapter 507, Appendix B, Appendix C and Appendix D.

8. The proposed retaining wall along the southern parcel boundary shall be designed and engineered by a licensed professional to account for surcharge load considerations. Prior to site construction permit issuance, the retaining wall design must be submitted for review and approval by the City to ensure compliance with applicable engineering and safety standards.

9. Duplex and four-plex units shall utilize shared driveways where feasible to minimize curb cuts and reduce potential traffic conflicts. Driveway access shall be designed to limit the number of curb cuts along the internal roadway while ensuring safe and functional access for all units.

10. All street and walkway lighting within the development shall be downward-facing and fully shielded to minimize glare and light spill onto adjacent properties.

11. All site driveways, including those serving duplex, triplex, and fourplex units, shall comply with the applicable driveway width standards set forth in SMC 18.48.090. Specifically, no driveways serving individual residential units shall exceed the maximum width of 20 feet, and site entrances shall be constructed within the code-allowed range of 9 to 30 feet. Final compliance shall be verified and approved by the City Engineer during civil site construction plan review.

12. Parking and play area lighting shall be directed away from neighboring properties to minimize glare and ensure compliance with city lighting standards.

13. The applicant shall post a performance bond in accordance with the requirements of Chapter 3.78 SMC to guarantee the timely completion of all required public improvements, including infrastructure such as streets, sidewalks, stormwater facilities, utilities, and any other improvements required by the city. The bond shall be submitted in a form acceptable to the City Attorney and the Public Works Director or Community and Economic Development Director, as applicable, as a cash bond or a surety bond underwritten by a company licensed to do business in the State of Washington. The amount of the bond shall be determined by the City Engineer to cover the cost of uncompleted improvements.

14. In addition, the applicant shall post a maintenance/warranty bond to ensure the satisfactory operation and maintenance of these improvements for a period of two years following their completion and final acceptance by the City. The maintenance bond shall guarantee that the improvements remain free from defects in labor, materials, and workmanship during this period. The bond shall also meet the requirements outlined in SMC 3.78.060, and a written agreement must accompany the bond, outlining the scope of work and timelines for completion.

15. The applicant shall ensure that all residential parking stalls are designed and constructed to meet the minimum size requirements of 9 feet by 19 feet, as specified in SMC 18.48.040

16. The developer shall include a Notice to Title as required under SMC 18.80.090 on the face of the final binding site plan. This notice shall inform potential property purchasers of any restrictions or protective tracts imposed by the City regarding the critical and environmentally sensitive areas on-site.

17. Prior to any ground-disturbing activities, the applicant shall obtain all necessary archaeological permits from the Washington State Department of Archaeology and Historic Preservation (DAHP) in accordance with RCW 27.53.060. No grading, excavation, or construction activity may begin until such permits are granted, if required. It is the applicant's responsibility to coordinate directly with DAHP regarding compliance with this requirement. All special conditions included in the DAHP Permit must be followed.

18. To protect the health and safety of future residents from a neighboring electric fence located along the eastern boundary of the site, the applicant is required to install a physical fence barrier along the full length of the eastern property line. The fence must be constructed of permitted materials per SMC 18.24.140(A). This condition is imposed pursuant to SMC 18.60.050, which authorizes the City to apply conditions necessary to protect the health, safety, and welfare of the neighborhood and community.

    The fence must be fully installed and inspected prior to final approval and recording of the binding site plan (BSP). Fence location and material specifications must be shown on the civil or landscape plans submitted with the final BSP application and are subject to approval by the Community Development Department.

19. A. Wetland enhancement plantings shall be implemented in accordance with the planting plan depicted in Figures 6 and 6A on page 30 of Exhibit 8.A.

    B. Installation of the enhancement plantings shall be completed and inspected by the City prior to the recording of the Binding Site Plan, unless otherwise authorized by the Director of Community

and Economic Development (DCED) upon submittal of a written request and justification demonstrating a valid reason.

C. The wetland buffer mitigation plan shall be subject to a minimum monitoring period of five years, as outlined in Section 3.5 of Exhibit 8.A.

PUBLIC WORKS CONDITIONS OF APPROVAL

20. Minimum 125' spacing between all existing and proposed intersections (including pipeline projects) is not met. The applicant will need to submit a written request of deviation prior to or concurrent with site construction permit , and provide justification, to allow their proposed approach to remain as detailed (less than 125' from Bell Creek's approach to the south) or revise their layout to meet or exceed the 125' spacing threshold.

21. Design, location, ownership, and operation and maintenance of the proposed pressure sewer system will need to be coordinated with the City of Sequim at the time of site construction permit final design. The City Public Works Department will not own and maintain a grinder pump system and therefore the proposed system will remain in private ownership by Applicant and its successors and assigns.

22. Non-City utilities are to be located outside of City right of way per Engineering Standards. Applicant to provide a 10' utility easement along the proposed frontage for non-City utilities on the final BSP drawings prepared for recording.

23. All improvements within the development and along the frontage are to provide stormwater mitigation compliant with the City standards and the Washington State Department of Ecology Stormwater Management Manual for Western Washington (SMC 13.104.030).

SEPA MITIGATIONS

EARTH

24. The project will implement erosion and sediment control best management practices (BMPs) throughout construction to minimize off-site impacts. All work will comply with the City of Sequim's Engineering Design and Development Standards. Additionally, a final grading plan must be submitted for review and approved by the Public Works Department before any ground disturbance occurs.

WATER

25. All site construction shall be conducted in compliance with the most current Stormwater Manual for Western Washington.

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or storm drains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are pollutants. Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington and is subject to enforcement action.

The following construction activities require coverage under the Construction Stormwater General Permit:

A. Clearing, grading and/or excavation that results in the disturbance of one or more acres and discharges stormwater to surface waters of the State; and

B. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more and discharge stormwater to surface waters of the State. This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, and discharge to surface waters of the State; and

C. Any site construction activity discharging stormwater to waters of the State that Ecology:

i Determines to be a significant contributor of pollutants to waters of the State of Washington.

ii Reasonably expects to cause a violation of any water quality standard.

D. If contamination is suspected, discovered, or occurs during the proposed SEPA action, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by testing, Ecology must be notified. Contact the Environmental Report Tracking System Coordinator for the Southwest Regional Office (SWRO) at (360) 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required, contact SWRO, Toxics Cleanup Program at (360) 407-7529.

E. If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted.

You may apply online or obtain an application from Ecology's website at:

http://www.ecy.wa.gov/programs/wq/stormwater/construction/ - Application. Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

AIR

26. Potential air impacts shall be mitigated by watering the site as necessary, utilizing dust suppression options and techniques described in the WA Department of Ecology publication # 96-433, 2016.

ENVIRONMENTAL HEALTH-NOISE

27. To mitigate the potential for noise impacts to surrounding properties, construction activities through complete buildout of this proposed development shall be limited from 7:00 am to 10:00 pm Monday through Friday and 9:00 am to 10:00 pm on weekends, consistent with Sequim Municipal Code 8.32.040.

ANIMALS

28. The applicant is responsible for avoiding any incidental harm to protected species under the Endangered Species Act (ESA) through habitat modification or degradation during all phases of the approved project. If any damage or degradation to ESA-listed species habitat occurs as a result of the project, the applicant must immediately notify the City's Public Works Director (or designee) and the appropriate federal agencies. The applicant must, at their own expense, take all necessary actions to stop further damage and restore the habitat in accordance with requirements from the relevant federal, state, and local agencies.

29. The designated open space area must be maintained to allow wildlife movement and remain free of fencing over four feet in height.

30. Landscaping must include native vegetation to support habitat functions for birds and small wildlife.

HISTORICAL AND CULTURAL RESOURCES

31. A professional cultural resource survey will be completed prior to any land disturbance on the project site. This survey will be conducted in coordination with the Washington State Department of Archaeology and Historic Preservation (DAHP) and the Jamestown S'Klallam Tribe. In the event that human remains or any evidence of cultural or historical significance is discovered during construction, work will be immediately halted. The appropriate authorities will be notified, and work may only resume once all applicable state and federal requirements are met. This condition will be clearly stated in the SEPA determination and referenced in the project approval documentation.

Notification to the Jamestown S'Klallam Tribe:

The applicant shall provide advanced written notification to the Jamestown S'Klallam Tribal Historic Preservation Office (THPO) at least 5 business days prior to the commencement of any archaeological survey, fieldwork, or ground-disturbing activities. Notification shall be sent to the THPO via email at ataylor@jamestowntribe.org or by phone at (360) 681-4638.

Coordination and Tracking Number:

The project applicant shall ensure that all cultural resource consultants include the DAHP Project Tracking Number in communications, reports, and submissions.

TRANSPORTATION

32. Prior to final subdivision approval, the applicant shall submit final construction plans for review and approval by the City of Sequim Public Works Department. In accordance with SMC 17.20.040, the plans shall demonstrate to the satisfaction of the City Engineer, that curb, gutter, sidewalk, trail connections, transit stops, streets, storm drainage, sanitary sewer lines, water lines and other utilities as required, will be installed at the expense of the applicant and meet City specifications and applicable ordinances.

SOLID WASTE MANAGEMENT

33. All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. All removed debris resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department or Department of Ecology for proper management of these materials.

PLANTS

34. The applicant is required to remove all Himalayan blackberry and other invasive plant species prior to installing new landscaping. The final landscape plan must incorporate drought-tolerant and native species where feasible, in accordance with SMC 18.24.130. All disturbed areas not occupied by impervious surfaces shall be revegetated. Compliance with the approved landscape plan will be verified through inspection prior to final occupancy.