

RESOLUTION NO. \_\_\_\_\_

ESTABLISHING PRIORITIES FOR WHATCOM COUNTY'S 2025 COMPREHENSIVE PLAN UPDATE

WHEREAS, the Washington State Growth Management Act (GMA) requires Whatcom County to develop a Comprehensive Plan for managing population growth and development, which was adopted in May of 1997; and

WHEREAS, the GMA requires Whatcom County to review urban growth areas (UGAs) under RCW 36.70A.130(3) to be able to accommodate population and employment growth projected for the 20-year planning period; and

WHEREAS, the GMA requires Whatcom County to periodically review and revise its Comprehensive Plan and development regulations under RCW 36.70A.130(1); and

WHEREAS, on August 9, 2016, Whatcom County adopted Ordinance 2016-034 updating the Comprehensive Plan; and

WHEREAS, the GMA requires Whatcom County to review, and if needed, revise its Comprehensive Plan and development regulations on or before June 30, 2025, and every ten years thereafter; and

WHEREAS, the current Comprehensive Plan contains chapters on many intersectional issues impacted by climate change, equity, and economic security including Land Use, Housing, Capital Facilities, Utilities, Transportation, Economics, Resource Lands, Recreation, and Environment; and

WHEREAS, on November 9, 2021, the Whatcom County Council passed Resolution 2021-049, adopting the 2021 Whatcom County Climate Action Plan, which develops goals, strategies, and actions to reduce greenhouse gas emissions and build climate resilience related to buildings, energy, industry, transportation, waste, land use, water, fisheries, agriculture, forestry and ecosystems; and

WHEREAS, Whatcom County has experienced increasingly severe and frequent effects of climate change including wildfires, smoke, heat dome, drought, and floods; and

WHEREAS, recent scientific reports from the Intergovernmental Panel on Climate Change point out that time is running short for communities everywhere to mitigate and adapt to the worst effects of climate change; and

WHEREAS, the Whatcom County Comprehensive Plan needs to more clearly integrate climate change, equity, and economic security throughout; and

WHEREAS, over the last several years, the Washington State Legislature considered several bills that address GMA and comprehensive planning including, but not limited to, [HB 1099](#) (2021-22) and [HB 1117](#) (2021-22); and

WHEREAS, legislation failing to pass during previous legislative sessions does not preclude Whatcom County from proactively and voluntarily incorporating these policy frameworks into the updated Comprehensive Plan; and

WHEREAS, in addition to climate change, Whatcom County has experienced significant socio-economic impacts due to the COVID-19 pandemic; and

WHEREAS, as early as 2019, the lack of affordable housing is recognized as an impediment to economic growth within Whatcom County by many in the community including the Business and Commerce Advisory Committee; and

WHEREAS, housing affordability continues to decline under unprecedented levels of national inflation; and

WHEREAS, historic growth trends may not accurately predict future needs and new methodologies may need to be introduced; and

WHEREAS, cities within Whatcom County have expressed concern that the traditional use of Urban Growth Areas (UGAs), and their associated restrictions, may incentivize development within unincorporated Whatcom County rather than targeted growth areas; and

WHEREAS, preservation of the Whatcom County's farmlands and agricultural industries is a common goal; and

WHEREAS, public input is a critical component to identifying priorities of the Comprehensive Plan; and

WHEREAS, The Whatcom County Council believes the updated Comprehensive Plan should reflect our shared values and address the current and future needs of Whatcom County; and

WHEREAS, the Whatcom County Council acknowledges that Whatcom County is a diverse landscape, home to a broad spectrum of cultures, and serving a wide variety of industries, and therefore recognizes that the solutions to the priorities identified here may take various forms throughout the County; and

WHEREAS, The Whatcom County Council looks forward to working collaboratively with the Executive, county staff, relevant Whatcom County boards, commissions, and advisory committees, seven cities, Native Nations, and stakeholders to adopt an updated Comprehensive Plan;

NOW, THEREFORE, BE IT RESOLVED by the Whatcom County Council that the following priorities be considered for incorporation into the updated Comprehensive Plan due on or before June 30, 2025:

1. Equity, environmental justice, and economic security should be guiding principles throughout all chapters of the Comprehensive Plan and associated planning and regulatory documents.
2. Engage government-to-government with Lummi Nation and Nooksack Indian Tribe in the development and implementation of the Comprehensive Plan, and work to ensure tribal

treaty rights and sovereignty are considered and upheld in all aspects.

3. Incorporate climate change mitigation, adaptation, resilience, and greenhouse gas (GHG) emission reduction throughout the Comprehensive Plan.
4. Promote the protection and restoration of healthy habitats for fish and wildlife throughout the Comprehensive Plan.
5. Collaboratively work towards economic security and affordable housing without sacrificing environmental health and public safety.
6. Support a thriving local agriculture and food system economy and food security, considering the impacts of climate change on agriculture as well as equity and housing needs of farmworkers.
7. Build resilience to climate change in forests that enables both a thriving timber economy and healthy sustainable forest ecosystems for wildlife, carbon sequestration and storage, and recreation.
8. More thoroughly consider impacts of climate change, equity, and economic security in relation to natural hazards mitigation and emergency response.
9. More thoroughly consider how growth patterns may have been altered from historic patterns in light of socioeconomic changes, climate change, and housing affordability challenges and what impact this should have on future planning.
10. Analyze the use of, and restrictions to, municipal Urban Growth Areas (UGAs) within the County to avoid unintended incentives to build outside of UGAs.
11. Maximize the environmental benefits of wetland mitigation and consider opportunities to increase development yield in urban areas by establishing off-site wetland mitigations with rigorous monitoring and adaptive management requirements in areas outside of cities.
12. Consider equitable contribution from development within unincorporated Whatcom County toward public and park infrastructure with the implementation of an impact fee program.

BE IT FURTHER RESOLVED, by the Whatcom County Council that the attached Exhibit A be considered as possible implementation strategies and actions that could help accomplish the priorities listed in this resolution.

BE IT FINALLY RESOLVED, that the Whatcom County Council recognizes the importance of coordinating and collaborating throughout the planning process with the following governments and stakeholders:

- Whatcom County departments including the Planning & Development Services, Public Works, Parks & Recreation, Health Department, Finance Department, and the Emergency Management Division of the Sheriff's Office.
- Whatcom County boards, commissions, and advisory committees including, but not limited

to, the Planning Commission, Climate Impact Advisory Committee, Flood Advisory Committee, Marine Resources Committee, Bicycle/Pedestrian Advisory Committee, Racial Equity Commission, Forest Advisory Committee, Agricultural Advisory Committee, Food System Committee, Child and Family Wellbeing Taskforce, Business and Commerce Advisory Committee, Housing Advisory Committee, and WRIA 1 Planning Unit.

- Native Nations including Lummi Nation and the Nooksack Indian Tribe.
- The seven incorporated cities of Whatcom County: Bellingham, Blaine, Ferndale, Lynden, Sumas, Everson, and Nooksack.
- The Port of Bellingham.
- The Public Utility District No. 1 of Whatcom County.
- Whatcom Conservation District.
- State Agencies including the Department of Natural Resources, Department of Ecology, Department of Fish and Wildlife, Department of Agriculture, and Department of Commerce.
- Whatcom County residents, business owners, farmers, farmworkers, community interest groups, and nonprofits.

APPROVED this \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

ATTEST:

WHATCOM COUNTY COUNCIL  
WHATCOM COUNTY, WASHINGTON

\_\_\_\_\_  
Dana Brown-Davis, Clerk of the Council

\_\_\_\_\_  
Todd Donovan, Council Chair

APPROVED AS TO FORM:

\_\_\_\_\_  
Karen Frakes, Civil Deputy Prosecutor

**EXHIBIT A:**  
**SUGGESTED IMPLEMENTATION STRATEGIES AND ACTIONS**

<p><b>1. Equity, environmental justice, and economic security should be guiding principles throughout all chapters of the Comprehensive Plan and associated planning and regulatory documents.</b></p>
<p>Strengthen the “Diverse Cultural Composition” section of the Land Use chapter to include both equity and sovereignty.</p>
<p>Incorporate relevant components from <a href="#">SB 5141</a> (2021-22) the Healthy Environment for all (HEAL) Act and the <a href="#">Washington Environmental Health Disparities Map</a>.</p>
<p>Incorporate the Whatcom County “Healthy Planning” approach established by <a href="#">resolution 2015-038</a>.</p>
<p>Consult with the Whatcom County Health Department, Racial Equity Commission, Child and Family-Wellbeing Taskforce, and organizations representing farm workers, farmers, low-income families and children, and other groups disproportionately impacted by climate change, environmental injustices, and economic insecurity.</p>
<p>Prioritize actions in overburdened communities that equitably enhance climate resilience and avoid or substantially reduce the adverse impacts of climate change in people, property, and ecological systems using best available science and climate projections.</p>
<p>Consider impacts to economic security and incorporate into relevant chapters.</p>
<p><b>2. Engage government-to-government with Lummi Nation and Nooksack Indian Tribe in the development and implementation of the Comprehensive Plan, and work to ensure tribal treaty rights and sovereignty are considered and upheld in all aspects.</b></p>
<p>Follow the framework established in <a href="#">HB 1717</a> (2021-22), concerning tribal participation in planning under the growth management act.</p>
<p><b>3. Incorporate climate change mitigation, adaptation, resilience, and greenhouse gas (GHG) emission reduction throughout the Comprehensive Plan.</b></p>

Mitigate and adapt to climate change, reduce greenhouse gas (GHG) emissions, and build climate resilience by implementing the recommendations of the <a href="#">Whatcom County Climate Action Plan</a> .
Change the title of the Environment chapter to "Environment and Climate Resilience"
Add goals of climate change mitigation and adaptation, and include measures to mitigate the adverse impacts of climate change on people, property, infrastructure, and ecological systems.
Add language to encourage a natural climate solutions approach to climate mitigation and resilience.
Use the best available science associated with climate change and biodiversity.
<b>Transportation Chapter</b>
Incorporate measures aimed at reducing transportation related emissions, including adding a goal to reduce vehicle miles traveled (VMT) by enhancing bicycle and pedestrian infrastructure, encouraging the use of public transportation, and improving coordination between development and transportation systems.
Implement the recommendations of the <a href="#">Whatcom County Pedestrian and Bicycle Plan</a> , the Regional Trails Plan, and Route Map proposed by the Bicycle/Pedestrian Advisory Committee.
Accelerate the transition to a low- or zero-emission transportation system (bicycles, cars, trucks, buses, and ferry) and associated infrastructure.
Develop a plan to transition the county fleet, including passenger vehicles, ferry, and other equipment, to electric, hydrogen, biofuels or other low- or zero-emission technologies.
Identify areas throughout the County, including the small cities, which may be feasible locations for transit-oriented development.
<b>Capital Facilities Chapter</b>
Consider climate change impacts to critical infrastructure and Whatcom County facilities.
Evaluate the climate vulnerability and risk of existing infrastructure in Whatcom County.

Increase energy efficiency and install electric heat pumps in County buildings.
Increase renewable energy generation and storage.
Facilitate the construction of publicly accessible electric vehicle charging infrastructure at county facilities such as county buildings, parks, and other community spaces like schools, libraries, and senior centers.
Ease existing barriers by updating relevant development regulations and land use and building codes such as updating parking requirements to require or incentivize parking spots to be EV-ready on all new industrial, commercial, and residential multi-family construction.
Design and build new county facilities in a sustainable way including net zero energy use, increasing energy resilience, utilizing local, sustainably sourced building materials, enhancing microgrid capabilities, and developing at locations that increase accessibility to public and alternative transportation modes.
Conduct an economic analysis for current county infrastructure, buildings, and transportation that factors in externalities of climate change to inform replacement prioritization and timeline.
<b>Utilities Chapter</b>
Work with public and private utilities to further reduce greenhouse gas emissions, increase renewable energy resources, and modernize the energy grid to build community and climate resilience.
Support the evaluation of Whatcom Public Utilities District #1 to expand renewable energy production, water, and broadband throughout the County.
Support Universal Broadband Access as a foundation for energy transition and digital equity. <ul style="list-style-type: none"> <li>● Establish a goal to achieve symmetrical gigabit broadband throughout the County.</li> <li>● Support efforts to establish and increase municipal/public broadband.</li> <li>● Incorporate a “Dig Once” policy for all new road construction projects, utility installations, and in planning for new residential, commercial, and industrial development.</li> </ul>
Enhance goals to reduce fossil fuel consumption and increase access to renewable energy resources. <ul style="list-style-type: none"> <li>● Review, and consider repealing, the moratorium and other restrictions on new wind energy systems, and updating any relevant wind energy code.</li> </ul>

<ul style="list-style-type: none"> <li>• Evaluate potential for geothermal and hydrogen energy in Whatcom County.</li> <li>• Assess opportunities to modernize the energy grid and other technologies and infrastructure necessary to deploy renewable energy and increase efficiency and energy security.</li> <li>• Work with privately or investor-owned utilities to support their transition to more renewable energy.</li> <li>• Incentivize a methodical transition away from natural gas and other fossil fuels while supporting a transition to electrification or other zero-emission alternatives.</li> </ul>
<p>Set goals to further improve water quality and quantity.</p> <ul style="list-style-type: none"> <li>• Fully implement the outcomes of the Nooksack Adjudication and/or “Solutions Table” process to ensure legal use of water that supports salmon recovery, agriculture, and drinking water for all residents.</li> <li>• Update policies and take action to further protect Lake Whatcom watershed.</li> <li>• Explore water infrastructure and technology solutions that can help store, conserve, improve efficiency, and alleviate the high demand during times of limited supply.</li> <li>• Incorporate recommendations and priorities from the <a href="#">Whatcom County Drought Contingency Plan</a>.</li> <li>• Ensure the <a href="#">Coordinated Water System Plan</a> is consistent with the comprehensive plan and development regulations, confirming current water supply and water systems can support future growth.</li> </ul>
<p><b>4. Promote the protection and restoration of healthy habitats for fish and wildlife throughout the Comprehensive Plan</b></p>
<p>Add a salmon recovery goal.</p>
<p>Implement the actions outlined in the Water Resource Inventory Area (WRIA) 1 <a href="#">Salmon Recovery Program</a> and <a href="#">Salmonid Recovery Plan</a>.</p>
<p>Incorporate recommendations and priorities from the <a href="#">WRIA 1 Watershed Management Plan</a>.</p>
<p>Identify and update regulations that protect wildlife corridors and habitat connectivity, protect, preserve, and restore healthy habitat and biodiversity, and protect fish and wildlife populations from human activities and structures.</p> <ul style="list-style-type: none"> <li>• Identify and map wildlife corridors and connectivity throughout the county.</li> <li>• Evaluate what lands are best for wildlife corridors and habitat restoration based on a cost-benefit analysis.</li> <li>• Develop a voluntary program that works with and compensates participating landowners.</li> </ul>
<p><b>Land Use Chapter</b></p>



Consider a framework and strategy for achieving net ecological gain of salmon and other aquatic species habitat for all public projects and a voluntary incentive driven framework and strategy for private projects.
Coordinate land use policy with water supply goals.
<b>Capital Facilities or Transportation Chapter</b>
Include an updated culvert inventory and prioritized list and proposed schedule for the elimination of identified fish passage barriers in coordination with the Tribes, State, Cities, and private landowners.
<b>5. Collaboratively work towards economic security and affordable housing without sacrificing environmental health and public safety.</b>
<b>Housing Chapter</b>
Ensure housing development meets current and future housing, equity, climate, and economic needs.
Add a goal that everyone, at every income level, has access to affordable housing, as defined by a household spending 30% or less of its income on housing costs.
Provide permanently affordable housing and home ownership opportunities in all neighborhoods for individuals earning between 50% to 120% of AMI.
Provide a full range of affordable housing types ranging from multifamily apartments, condos, and duplexes to detached single family homes, ADU's, and tiny homes.
Target an average rental vacancy of 5%, and available housing supply of 4-6 months, for all income levels.
Update, strengthen, and streamline land use codes, housing regulations, and permitting processes that further encourage, and where appropriate, require more affordable, dense, sustainable, low impact, and energy efficient development.
Support building and energy codes that transition to all-electric new residential construction.
Support incentive programs that promote solar panels, electric heat pumps for space and water heating, and weatherization for existing residential and commercial buildings.

Consider permitting and land use policies that increase affordable housing such as sustainable development incentives, expedited permitting and fee reductions, form-based building codes, transit-oriented development, infill development, density bonuses, clustering subdivisions, urban villages, and farmland trusts.
Expand opportunities to increase mixed and middle housing options.
Consider County acquisition of land for permanently affordable housing development such as a community land trust or land bank model.
Consider availability and development of housing near employment opportunities to reduce travel needs.
Invest in wetland mitigation throughout Whatcom County and explore off-site wetland mitigation as a strategy to increase development capacity.
In development regulations, protect critical areas by strengthening mitigation requirements including requiring net gain in pervious surface area and tree canopy cover.
<b>Economic Chapter</b>
Promote a more diverse, equitable, sustainable, and climate resilient future economy.
Support living wage job creation in green industry, commerce, forestry, and agriculture.
Support a just clean energy transition for workers and communities.
Invest in robust economic and workforce development at all levels, including in climate-resilient and green energy related fields.
Support supply chain resiliency.
Increase access to quality and affordable childcare by implementing the recommendations of the <a href="#">Whatcom County Child and Family Well-Being Action Plan</a> .
Increase access to quality and affordable high-speed broadband.

**6. Support a thriving local agriculture and food system economy and food security, considering the impacts of climate change on agriculture as well as equity and housing needs of farmworkers.**

**Resource Lands Chapter**

Consider the impacts of climate change, water resources, and flood control on agriculture and agricultural workers such as rising temperatures, more severe and unpredictable weather events, flooding, air quality, water quality and quantity, and soil health.

Work to provide secure and legal access to water for farmers employing water conservation and water use efficiency principles.

Integrate water supply planning and land use planning to support Whatcom County's goal of maintaining a minimum of 100,000 acres of agricultural land.

Promote opportunities to increase sustainability and climate resilience in agriculture and processing.

Enhance local food security and food sovereignty by implementing the recommendations of the [Whatcom Community Food Assessment](#).

Improve wages, housing, and working conditions for food chain workers.

Ensure safe and affordable on-farm housing, transportation, and healthcare for farmers and farmworkers.

Increase demand for local food products and expand support networks for local agriculture product development.

Encourage research and development of drought- and heat- tolerant crops, and agriculture technologies that will reduce emissions, improve soil health, and increase efficient use of water.

Encourage farming practices that protect and regenerate soil, water, land, and carbon sequestration.

Preserve productive agricultural lands across Whatcom County by implementing the recommendations of the [Whatcom County Agricultural Strategic Plan](#) and the [2019 Rural Land Study](#), considering rezoning (such as R5 to Ag 20 or similar), and increasing funding and staff capacity for the Conservation Easement Program.

Expand allowable agricultural land uses to include non-traditional farming models.

**7. Build resilience to climate change in forests that enables both a thriving timber economy and healthy sustainable forest ecosystems for wildlife, carbon sequestration and storage, and recreation.**

Support a thriving local forest products industry and sustainable local resource economy.

Encourage and incentivize management practices that promote wildlife habitats, forest and watershed health, climate resilience, carbon sequestration and storage, and sustainability.

- Develop Forest Management Plans for Lake Whatcom Park, Canyon Lake Community Forest, and Stewart Mountain Community Forest with these values in mind.

Encourage research and development and the use of best available science in the evaluation and mitigation of potential adverse impacts from timber harvesting to peak flows, low summer stream flows, water quality, wildlife, slope stability and wildfire risk.

Engage and collaborate with forest management experts, practitioners, professionals and researchers to obtain well informed and broad understanding of issues in order to facilitate prudent decisions and formulate positions on forestry issues.

- Examples include the Cooperative Monitoring, Evaluation, and Research (CMER) Committee (Forest Practices Board), DNR's Olympic Experimental Research Forest scientists and its research partners, and the Whatcom County Forest Advisory Committee.

Recognize the ability for sustainable forest practices to produce a wide variety of benefits, and identify opportunities to optimize the wood production and carbon storage capacity of forestlands in Whatcom County through the application of extended harvest rotations.

Provide feedback into Environmental Impact Statements or State Environmental Policy Act on regulatory or policy changes to forest management during planning level analyses in order to influence and encourage climate considerations in decision making while providing certainty to industry and other proponents.

Encourage uneven-aged forest management practices through selective harvest and variable density thinning to enhance structural complexity, biodiversity, drought-tolerance, fire resilience, hydrologic function, and protection of fish-bearing and non-fish-bearing streams.

Expand carbon market opportunities that reward landowners who actively manage their forests to increase carbon storage and sequestration and enhance ecosystem services.

Evaluate the net loss or gain in carbon emissions and ecological function when rezoning forest lands for other uses.
Encourage reforestation, or afforestation, of previously cleared riparian and upland areas through providing funding, seedlings, expertise, and outreach.
Consider development pressures on working lands and work with partners on the possibility of establishing a Whatcom County goal of maintaining a minimum number of working forest land that is required to sustain local forestry infrastructure.
Increase funding and staff capacity for the Conservation Easement Program in order to protect forest lands from development, particularly as a strategy to protect forest lands in the Lake Whatcom watershed.
Promote development of Whatcom Grown timber products that support climate resilience, the local timber economy, and reduce transportation-related emissions.
Support the forest industries and workers as they transition to more climate resilient forest harvest techniques, including any support needed to increase wages, benefits, and safety of workplace conditions.
Actively support recreation on working forests by adequately funding Whatcom County Parks to develop and maintain existing county owned lands; collaborate at all levels of county government with other landowners in planning, development, maintenance as well as law enforcement support; provide funding to support other landowners in managing public use impacts in recognition of the benefits forest recreation provides to the county and its residents.
<b>8. More thoroughly consider impacts of climate change, equity, and economic security in relation to natural hazards mitigation and emergency response.</b>
Incorporate climate change into the Whatcom County <a href="#">Natural Hazards Mitigation Plan</a> , and synchronize with <a href="#">FEMA hazard mitigation planning</a> best practices and the comprehensive plan.
Incorporate climate change impact assessments and vulnerability and risk assessments to inform future development and preservation efforts.
Consider the impacts of flooding, increasing temperatures, heat domes, droughts, wildfire, and smoke to human health, the environment, natural resources, resource lands, and economic security.
<b>Land Use and/or Environment Chapter</b>

- Enhance flood sections to help mitigate against increased intensity and frequency of flood events.
- Reduce flooding risk by fully supporting the implementation of recommendations and priorities from the most current and ongoing [Whatcom County Flood Integrated Plans](#), including the [Lower Nooksack River Comprehensive Flood Hazard Management Plan](#).
  - Factor flood-related displacement of people and property into growth projections and urban growth areas.
  - Restore, where possible, the environmental functions of rivers and streams.
  - Improve flood plain water storage and infiltration capacities.
  - Consider levee setbacks where appropriate.
  - Better prepare for floods and consider the disproportionate impacts of flooding on rural and vulnerable communities.
  - Support buybacks in designated floodways.
  - Consider water storage options that do not include dams.

Build resilience to climate change while reducing flood risks by supporting efforts to increase tree canopy cover (particularly in riparian areas) and reducing impervious surfaces.

- Enhance land use planning in the wildland urban interface (WUI) to reduce and mitigate the risk to people and property posed by wildfires.
- Reduce residential development pressure in the wildland urban interface area.
  - Create open space buffers between human development and wildfire-prone landscapes.
  - Protect existing residential development through community wildfire preparedness and fire adaptation measures.

**Environment and/or Shoreline Chapter**

More thoroughly incorporate coastal resilience to plan, prepare, build resilience to climate impacts, and reduce vulnerabilities and risks. Ensure consistent language is included in associated codes as well, including the Critical Areas Ordinance, Shoreline Management Program, and relevant sections of Title 20 zoning.

Plan for sea level rise, changing ocean conditions, storm surges, and floods, and its impacts on coastal residential communities, declining marine fisheries, shellfish beds, coastal infrastructure, and recreation areas.

Reduce development in current and projected future shoreline areas.

**Capital Facilities Chapter**

Consider establishing and maintaining County Resilience Centers during emergencies or disasters. These facilities could:

- Provide controlled temperature shelter as well as food, water, and cots for disasters or power outages.
- Prioritize under-served communities more vulnerable to disasters such as floods, wildfires, and prolonged heat/cold spells.

**10. Analyze the use of, and restrictions to, municipal Urban Growth Areas (UGAs) within the County to avoid unintended incentives to build outside of UGAs.**

Update policies on UGAs in light of current environmental regulation such as critical areas, shorelines, and stormwater regulations.

Update policies using current best practices for agricultural and protected watersheds.

Consider provisions for flexibility of municipal UGA boundaries to yield greater development densities, fewer environmental impacts, and more affordable housing outcomes.

**11. Maximize the environmental benefits of wetland mitigation and consider opportunities to increase development yield in urban areas by establishing off-site wetland mitigation areas outside of cities.**

Develop cooperative policies that preserve and grow natural areas outside of cities by allowing off-site mitigation in the County.

Update policies on wetland mitigation to allow lower quality wetlands with little to no habitat value to be mitigated off-site.

Consider a mechanism by which rural, private property owners are able to derive monetary benefit from wetland mitigation initiatives.