



ELIZABETH KOSA
DIRECTOR

Lauren Clemens
Climate Action Manager
322 N Commercial, 2nd Floor
Bellingham, WA 98225
Phone # (360) 778-6241

TO: Whatcom County Planning Commission

THROUGH: Mark Personius, Planning and Development Services Director
Elizabeth Kosa, Public Works Director

FROM: Lauren Clemens, Climate Action Manager

DATE: September 18th, 2025 – Amended September 30th, 2025

RE: Whatcom County Comprehensive Plan- Climate Element (Chapter 12)-
Planning Commission Deliberation and Amendments

Background and Purpose

The Whatcom County Council Committee of the Whole held a joint meeting with the Whatcom County Planning Commission to discuss Comprehensive Plan Chapter 12 (Climate) on August 6th, 2025. The Whatcom County Planning Commission also held a public hearing and work session on Chapter 12 (Climate) on August 14th, 2025. The work session on September 30th, 2025 served as a continuation of the work session held on August 14th. All amendments approved by the Planning Commission are notated in track changes in the attached chapter unanimously approved by Planning Commission on September 30th. The following is a staff report documenting the Planning Commission deliberative process and addressing questions or items held from the August 6th and 14th Planning Commission meetings, as well as responses regarding letters submitted related to HB 1181 requirements. The staff memo was updated following the September 30th Planning Commission meeting.

Supporting Documents Discussed at August 6th and August 14th Meetings: [AB2025-551](#)

1. Planning Commission/ Council Questions- Joint Meeting- August 6th, 2025-

A. Voluntary Greenhouse Gas Emissions Reduction Subelement Approval Process-

Planning Commission Action- DISCUSSED- August 6th, September 30th

RCW 36.70A.095 outlines the new optional process for voluntary Commerce approval of the greenhouse gas (GHG) emissions reduction sub-element. If Commerce approves the submitted greenhouse gas (GHG) emissions reduction sub-element, Commerce would then defend its decision before the state's Growth Management Hearings Board, should the sub-element be appealed. Whatcom County submitted a Notice of Intent in June 2025 to retain the option for voluntary approval of the greenhouse gas emissions subelement.

Based on the Commerce approval for Greenhouse Gas Emissions Reduction Subelements fact sheet (June 2025), this new review process would require adoption of the climate element by November 1st, 60 days prior to the periodic due date of December 31st, 2025. Whatcom County is in the process of sequential review with both the Planning Commission and the

Whatcom County Council prior to the public hearing on the full Comprehensive Plan update. GMA changes due to HB 1181 have required substantial revisions to the existing chapters and included drafting a new chapter, the climate element, in addition to updates to multiple other elements. These updates related to new HB 1181 requirements include revisions to the Capital Facilities, Land Use, Parks and Recreation, Transportation, and Utilities elements. Other policies consistent with the resilience subelement are also included within the Resource Lands and Environment elements. Elements are still in the process of sequential review with both Planning Commission and Council, a process that will extend into 2026.

The GMA also requires that “(1) Comprehensive plans must be internally consistent. This requirement means that differing parts of the comprehensive plan must fit together so that no one feature precludes the achievement of any other,” while not allowing revision more frequently than 12 months after the adoption, [RCW 36.70A.130](#). The voluntary review process for the greenhouse gas emissions subelement as outlined in the fact sheet would present a challenge to the internal consistency review and the annual review process, unless a submission extension consistent with the concurrent approval schedule is allowed. Adopting one element by November 1st independent of the remainder of the elements may result in an element that is inconsistent with the remainder of the adopted Comprehensive Plan elements. Retaining an adoption date for the climate element that is the same as the other elements will allow for an aligned annual review date and coordinated internal consistency review across elements, particularly as final state guidance and HB 1181 rulemaking are underway.

Whatcom County is working with WA Department of Commerce to determine whether a later submission date is allowable for voluntary review and approval. In the interim, consistent with RCW 36.70A.130(d), that “(d) State agencies are encouraged to provide technical assistance to the counties and cities in the review of critical area ordinances, comprehensive plans, and development regulations,” the County has requested a comment letter from WA Department of Commerce on the climate element. Any comment letter submitted by state agencies will be forwarded to both Planning Commission and Council.

Supporting documentation:

[Voluntary Greenhouse Gas Reduction Sub-element Approval, WA Department of Commerce \(2024\)](#)

September 30th Follow-Up Question from Commissioner Dunne- Do we have to approve this element by November 1st, separate from the other elements?

Whatcom County Council will approve the full Comprehensive Plan following the process of sequential review by chapter. Adopting the chapter separately would delay the chapter from becoming effective until Commerce finishes their review. The County requested a comment letter on September 10th from WA Department of Commerce in lieu of the voluntary review, given the lack of flexibility regarding the timeframe as dictated by the RCW. If Commerce is able to amend the approval timelines, then Planning and Development Services will determine if the voluntary process aligns with the chapter adoption schedule.

2. Planning Commission Questions- August 14th, 2025

A. Tribal Consultation Requirements- Comprehensive Planning (HB 1717- 2022)/ Climate Commitment Act Funds (HB 1753- 2022)

Planning Commission Action- AMENDED- Policy 12.3.1- September 30th

The following outlines state requirements for Tribal consultation related to comprehensive planning and applications for funding from state Climate Commitment Act accounts, new state legislation passed since the last periodic update. This consultation is independent of and separate from other Tribal consultation required by federal and state law with affected Tribes before, during, and after project review. Policies related to historic and cultural resources can also be found in the Land Use element.

RCW 36.70A.040(8)- Based on provisions of HB 1717- RCW 36.70A.040(8), a federally recognized Indian Tribe may voluntarily choose to participate in the county or regional planning process and coordinate with the county and cities. Upon receipt of notice in the form of a Tribal resolution from a federally recognized Indian Tribe whose reservation or ceded lands lie within the county, the county, cities, and other local governments conducting the planning will enter into good faith negotiations to develop a mutually agreeable memorandum of agreement with such Tribes in regard to collaboration and participation in the planning process for any areas planned for urban growth consistent with the terms outlined in the memorandum of agreement provided for in RCW 36.70A.040(8).

Supporting documentation: [Draft Climate Element- Comments and Revisions](#)

RCW 36.70A.210(4)- Federal agencies and federally recognized Indian Tribes whose reservation or ceded lands lie within the county shall be invited to participate in and cooperate with the countywide planning policy adoption process. Adopted countywide planning policies shall be adhered to by state agencies.

Supporting documentation: [Draft Countywide Planning Policies- Tribal Cultural Resources](#)

RCW 70A.65.305- Applicants for Climate Commitment Act funding (state appropriations from RCW 70A.65.250, RCW 70A.65.260, and RCW 70A.65.270) must engage in a pre-application process with all affected federally recognized Tribes. This pre-application process must include the department of archaeology and historic preservation, department of fish and wildlife, and all affected federally recognized tribes in the project area. The consultation is independent of, and in addition to, any public participation process required by federal or state law, or by a federal or state agency, including the requirements of [Executive Order 21-02](#) related to archaeological and cultural resources. The requirements of this section apply to local governments that receive funding from these accounts.

Supporting documentation:

[Climate Element- Greenhouse Gas Emissions Subelement- Cultural Resources](#)

September 30th Follow-Up Question from Commissioner Dunne: Is Tribal consultation is only for those Tribes with land in the County?

Tribal consultation processes outlined in the memo include new Tribal consultation

requirements for countywide planning policies, comprehensive planning, and for funding received from Climate Commitment Act accounts. These are all statewide requirements and are independent of any other project related review. The requirements for Tribal consultation for local governments applying for Climate Commitment Act funds are outlined in RCW 70A.65.305.

B. WA Department of Commerce Intermediate Guidance- Climate Element Development & Planning Commission Amendments

Planning Commission Action- DISCUSSED- August 14th, September 30th

According to the WA Department of Commerce Intermediate Guidance, a jurisdiction may develop its own goals and policies, as well as select ones from Commerce's Menu of Measures, to address the minimum requirements in HB 1181. Policies that are not specifically identified in the [Menu of Measures](#) will be considered consistent with the intermediate guidance if they are measurable and supported by scientifically credible projections and scenarios that indicate their adoption is likely to result in reductions of greenhouse gas emissions or per capita vehicle miles travelled or reflect scientifically credible climate projections and impact scenarios that moderate or avoid harm. Commerce directs that state drafted "measures will need to be adapted to reflect local conditions and priorities before adding them to your comprehensive plan." The development of the climate element, while new, is part of an existing procedural process that includes, "requires a series of interrelated steps," including developing "the initial comprehensive plan, evaluating amendments as part of the docket cycle, including best available science (draft rulemaking amendment), conducting the periodic update and reviewing the urban growth boundaries, amending development regulations, and conducting subarea planning. Each of these has different levels of significance and different procedural requirements" (WAC 365-196-600). The interim climate guidance will be the basis for determining Whatcom County compliance with new GMA requirements, as Commerce will complete its final guidance when the Comprehensive Plan is due. After December 2025, Commerce, "shall provide for a process for local governments and other parties to submit alternative actions for consideration for inclusion into the guidelines at least once per year."

The element as proposed, represents a recommended set of draft policies for the Planning Commission and Council review in response to the laws that have changed since the periodic update. These policy topics were not previously addressed in the 2016 Comprehensive Plan or current adopted development regulations. The new policies, both in the climate element and across the Comprehensive Plan, represent a combination of voluntary cross-jurisdictional strategies, policies relating to new regulatory requirements due to HB 1181 or other state climate legislation, and non-regulatory actions that the County can lead or support under its existing statutory authority. To develop and customize policy language, staff audited guidance documents and developed goals and policies for the element based off of the following documents listed below. The draft element was then revised between January- June 2025 based on comments from advisory committees, Tribal staff, and County staff. The interim draft included all Planning Commission amendments in track changes from the August 14th meeting.

Documents reviewed to draft policy language in the climate element included:

State Guidance

- WA Department of Commerce- Intermediate Guidance
- WA Department of Commerce- Menu of Measures

- HB 1181- Climate Planning GMA Amendments

Whatcom County Communitywide Plans

- Whatcom County 2016 Comprehensive Plan
- Whatcom County 2021 Climate Action Plan
- Whatcom County 2021 Natural Hazard Mitigation Plan
- Whatcom County 2023 Food Systems Plan
- Whatcom County 2023 Extreme Heat & Smoke Vulnerability Assessment
- Whatcom County 2025 Future Shorelines Vulnerability Assessment
- Whatcom County 2025 Electric Vehicle Infrastructure Assessment

Whatcom County Advisory Council, Committee, and Staff Recommendations

- Whatcom County Council Resolution 2022-036
- Climate Impact Advisory Committee
- City and County Planner Group- Resilience Subcommittee
- Business and Commerce Advisory Committee
- Bicycle and Pedestrian Advisory Committee (member)
- Marine Resources Committee (member)
- Whatcom County Department Subject Matter Experts- Planning and Development Services, Health and Community Services, Public Works, Parks and Recreation, Emergency Management, and Facilities Management

Locally Adopted Climate Plans

- City of Bellingham 2018 Climate Action Plan
- Lummi Nation 2016 Climate Change and Adaptation Plan
- Lummi Nation 2024 Priority Climate Action Plan
- Nooksack Indian Tribe 2017 Climate Change Adaptation Plan
- Port of Bellingham 2021 Comprehensive Economic Development Strategy
- Port of Bellingham 2023 Climate Action Strategy
- Whatcom Transit Authority 2023 Sustainability Plan
- Whatcom Council of Governments 2022 Way to Go Whatcom Plan

Adopted Comprehensive Plans- Other Jurisdictions

- City of Bellingham Comprehensive Plan
- Federal Way, WA Climate Element
- San Juan County Climate Element Recommendations
- Broward County, FL Climate Element
- Richmond, VA Environment Element
- Dover, NH Master Plan Climate Adaptation Chapter
- Denver, CO Environment Resilience Comprehensive Plan
- New Orleans, LA Master Plan
- Miami Beach, FL 2040 Comprehensive Plan
- Milwaukie, OR Environmental Stewardship and Community Resiliency
- San Francisco, CA Environmental Justice Framework
- San Mateo, CA Climate Element
- San Luis Obispo, CA Climate Adaptation and Safety
- Jackson Teton County, WY Climate and Sustainability Element

Cities and counties that fully plan under the Growth Management Act (GMA) are required to have planning commissions review and make recommendations on comprehensive plans, land use regulations, and community development issues to the agency's governing body. According to requirements for fully planning jurisdictions in [RCW 35.63.100](#), the Planning Commission may recommend to the Council the element as a whole, may recommend parts of the element subject to successive recommendations, or prepare and recommend any amendment to the element for Council's consideration.

Supporting Documentation: [Comments and Revision Matrix](#)

Follow-Up Question from Commissioner Dunne: Which policies are on the Menu of Measures, which are our own?

The policies were modified from the WA Department of Commerce Menu of Measures and from other policy sources referenced in 2B. The Menu of Measures was last accessed in August 2024. The table at the end of the staff memo summarizes a series of topics covered in the climate element and the respective Menu of Measure policy. (See table added at end of memo cross referencing policy topic and Menu of Measure policy from Commerce).

C. Flow Control Ordinance & Requirements for Operators-

Planning Commission Action- AMENDED- Policy 12.9.5- September 30th

The Department of Ecology (Ecology) recently approved Whatcom County's amendment to the [2022-2027 Comprehensive Solid and Hazardous Waste Management Plan](#). Section 8.2.1 "Construction and Demolition Debris and Recycling," describes the County's Flow Control Ordinance (Ordinance No. 91-041) which requires that solid waste generated in the County be processed or disposed of at a designated waste facility. The ordinance also establishes priority levels for waste disposal sites that favor recycling or other means of diversion over landfilling of unseparated solid waste. However, the ordinance exempts construction and demolition waste. A subsequent ordinance (Ordinance No. 96-037) further exempts construction and demolition waste from the Flow Control Ordinance. This amendment allows disposal of construction and demolition waste at undesignated disposal sites, including sites located outside the County. Based on these existing exemptions, it is difficult for Whatcom County to determine the current recycling levels of construction and demolition materials, given their out-of-county disposal location. According to the CSHWMP, revising the current exemption may encourage better management at existing in-County facilities to ensure material recovery prior to disposal. Policy 12.9.5 is consistent with that recommendation, any subsequent review or revision of the ordinance would likely be discussed by the Whatcom County Solid Waste Advisory Committee as a recommendation to Council.

3. Planning Commission Questions- September 30th

A. HEAL Act and Renewable Energy Permitting-

Planning Commission Action- DISCUSSED- September 30th

September 30th Follow-Up Question from Commissioner Dunne: HEAL Act is specifically for state agencies, not counties or local jurisdictions. What specifically do you want to change about renewable energy permitting?

The Interagency Clean Energy Siting Coordinating Council was created in 2023 by HB 1216 to streamline and consolidate the siting and permitting processes for clean energy projects, establishing a coordinated process and pathways for developers. This council is co-chaired by WA Department of Commerce and Ecology and was intended by the legislature to, “enable more efficient and effective siting and permitting of clean energy projects with policies and investments that protect the environment, overburdened communities, and Tribal rights, interests, and resources, including cultural resources, bring benefits to the communities that host the clean energy projects, and facilitate the rapid transition to clean energy that is required to avoid the worst impacts of climate change on Washington’s people and places.” Developers can opt into the statewide process over local permitting, each project is determined on a case by case basis regarding local preemption. WA Department of Commerce and Ecology are both covered agencies under the HEAL Act and the Clean Energy Siting Coordinating Council provides annual reports outlining progress on its statutory duties under the HEAL Act.

B. Natural Resource Based Industry & Habitat Conservation-

Planning Commission Action- DISCUSSED- September 30th

September 30th Follow-Up Question from Commissioner Dunne: Some measures promote using local timber. Other measures in this chapter protect local timber and ecosystems. Which is the priority?

The two are not mutually exclusive and the GMA requires planning for both. The GMA goal in RCW 36.70A.020 is to, “Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands, and discourage incompatible uses.”

RCW 36.70A.030(1) also defines the five types of critical areas for designation using best available science- wetlands, areas with a critical recharging effect on aquifers used for potable water, frequently flooded areas, geologically hazardous areas, and fish and wildlife habitat conservation areas. These topics are predominantly discussed in the Resource Lands and Environment chapters, though supportive policies are included in the climate element.

C. Tree Canopy Cover & Developable Land-

Planning Commission Action- DISCUSSED- September 30th

September 30th Statement from Commissioner Dunne: Increasing the tree canopy in the UGA means less land for housing.

HB 1181 as amended reads, “a parks and recreation element... shall include: (c) an evaluation of tree canopy coverage within the urban growth area.” The Parks and Recreation chapter was amended to include the required evaluation of tree canopy coverage in the UGA. See maps developed for that chapter.

4. Planning Commission Approved Amendments-

Amendment 1. Commissioner Dunne moved to amend the Consistency with the Whatcom County Climate Action Plan section and add the current emissions compared to 1990 levels and the current emissions compared to the 2000 levels. (8-0-0)

The Consistency with the Whatcom County Climate Action Plan section (page 12-2) is amended to include the following, “The total emissions countywide in Whatcom County in 2017 were 11,095,275 MTCO₂e and 8,377,187 MTCO₂e in 2022, a 24.5% reduction predominantly associated with a 66% reduction in industrial processing emissions.”

The Washington Department of Commerce intermediate guidance recommends using 2022 as the baseline year for greenhouse gas emissions and recommends consistency with the statewide net zero target by 2050. To establish a countywide framework from which county and city comprehensive plans are developed and adopted, Whatcom County and each jurisdiction proposed countywide planning policy T3- “The County and cities will incorporate comprehensive plan policies to support the net zero greenhouse gas emissions target by 2050 consistent with the Washington statewide target set by the State Legislature ([RCW 70A.45.020](#)).”

Even if Washington implemented all of its currently enacted climate legislation and all federal policies remain in effect, statewide forecasting indicates it is not currently feasible to reach net zero by 2050. Recent modelling completed as part of the state draft [Comprehensive Climate Action Plan](#) indicates that, “a key result of the Reference Scenario is that there are insufficient greenhouse gas mitigation options available that are feasible to implement, based on the U.S. EPA supply curve for non-CO₂ greenhouse gases for Washington, to address the projected emissions of non-CO₂ greenhouse gases (methane, nitrous oxide, and fluorinated gases) in 2050. [The last available statewide greenhouse gas emissions](#) inventory for 2021 indicated that statewide emissions in 2021 were 5.6 MMT CO₂e above 1990 levels. Note: the Washington Department of Ecology statewide inventory reported 96.1 MMT of CO₂e in 2021. The 1990 total listed in the statewide inventory was 93.9 MMT CO₂e and 90.5 MMT CO₂e in RCW 70A.45.020.

The draft climate element does not set an emissions target, but progress reporting will track both countywide and County operations emissions by utilizing the U.S. Community Protocol and Local Government Operations emissions inventory protocols. These greenhouse gas emissions inventories will be updated on a 5-year cycle (with 2029 data) in conjunction with the 5-year climate element progress report that will be due in 2030- additional performance measures consistent with the element will be developed in conjunction with subsequent guidance. Whatcom County first completed a greenhouse gas inventory in 2017 and as part of this comprehensive planning cycle, the methodology for the 2017 inventory was adjusted to allow for emission trend extrapolation. The 2017 inventory was the first Whatcom County specific emissions data available, as the statewide emission inventory data published by Ecology is not disaggregated by county. The total emissions countywide in Whatcom County in 2017 were 11,095,275 MTCO₂e and 8,377,187 MTCO₂e in 2022, a 24.5% reduction predominantly associated with a 66% reduction in industrial processing emissions.

A summary of Whatcom County five-year trends by emissions sector used for planning purposes is included below:

	2017 (MTCO₂e)	2022 (MTCO₂e)	% Change
Buildings & Energy	4,417,738	4,272,328	-3%
Industrial Processes	3,862,349	1,330,442	-66%
Transportation	1,089,709	1,125,418	3%
Solid Waste and Wastewater	97,826	110,681	13%
Other Fugitive Emissions	116,567	127,219	9%
Land Use	1,511,086	1,411,099	-7%
Total Emissions	11,095,275	8,377,187	-24.5%

The schedule in RCW 70A.45.020 for statewide emissions reductions requires Ecology to track emissions trends towards the following goal, unless amended by the legislature:

- (1)(a) The state shall limit anthropogenic emissions of greenhouse gases to achieve the following emission reductions for Washington state:
- (i) By 2020, reduce overall emissions of greenhouse gases in the state to 1990 levels, or 90,500,000 metric tons;
 - (ii) By 2030, reduce overall emissions of greenhouse gases in the state to 50,000,000 metric tons, or 45 percent below 1990 levels;
 - (iii) By 2040, reduce overall emissions of greenhouse gases in the state to 27,000,000 metric tons, or 70 percent below 1990 levels;
 - (iv) By 2050, reduce overall emissions of greenhouse gases in the state to 5,000,000 metric tons, or 95 percent below 1990 levels.”

While the data is not available to backdate Whatcom County emissions data to 1990 or 2000, the draft climate element includes the emissions trend over the last five years. Looking forward, a commensurate countywide target would track towards the following:

- (i) 4.5% annual countywide reductions between present and 2030
- (ii) 4.6% annual countywide reductions between 2030 and 2040
- (ii) 8.1% annual countywide reductions between 2040 and 2050

By 2045, the 20-year comprehensive planning period, alignment with the state legislative target at the local scale would require a reduction to aggregate countywide total of 1.72 million MTCO₂e, a 79.5% reduction from a 2022 baseline.

Further guidance will be necessary to set any countywide emissions reduction targets for tracking specific to County operations, unincorporated Whatcom County, or countywide as the intermediate guidance does not specify an emissions interim target setting methodology consistent with the state legislative reduction schedule, provide direction regarding coordinating with other jurisdictions to develop regionally consistent emissions reduction targets between counties and cities, provide a clear definition of any applicable emissions exemptions for GMA compliance, reconcile data sources, regulatory requirements, or overlapping local, state, and federal emissions reporting requirements.

Supporting documentation:

[2017-2022 Whatcom County Greenhouse Gas Emissions Trends](#)

[2022 Whatcom County Greenhouse Gas Inventory](#)

2. Commissioner Browne moved to add, “Much discussion has occurred, how to reduce emissions, but our ability to achieve this is uncertain,” after Commissioner’s Dunne’s amendment to the Consistency with the Whatcom County Climate Action Plan section on page 12-2. (5-2-1)

In support of the Comprehensive Planning process, Whatcom County contracted to complete forecasting analysis of Whatcom County’s communitywide emissions from 2022 to 2050. That initial analysis evaluated the following projections under three forecasts (ranges represent sensitivity analyses based on a range of federal and state policy implementation scenarios):

- Under a business-as-usual (BAU) projection, which assumes no action is taken to reduce GHG emissions, Whatcom County’s countywide emissions will grow 22% by 2050 (compared to a 2022 baseline).
- The adjusted business-as-usual (ABAU) projection, which models estimated emissions reductions from existing federal, state, and regional policies, estimates 0% to 22% reduction in countywide emissions by 2050 (compared to a 2022 baseline).
- The additional local action projection, which models estimated emission reductions from local climate actions, such as reducing building energy consumption or transitioning to electric vehicles, estimates a 55% to 80% total reduction in countywide emissions by 2050 (compared to a 2022 baseline).

The GMA requires cities, counties, and Commerce to report progress toward implementing comprehensive plans as part of a five-year implementation progress report. In RCW 36.70A.130 as amended by [HB 1241](#), Commerce is required to adopt guidelines for indicators, measures, milestones, and criteria for use by counties and cities in this implementation progress report. Following the adoption of the Comprehensive Plan, Whatcom County will be responsible for identifying regulations, zoning and land use changes, and other legislative or administrative action consistent with the Climate Element. The intermediate guidance as issued does not currently provide any direction regarding indicators, measures, milestones, or provide minimum compliance requirements for regulatory, zoning, or land use changes. Continuing work for HB 1181 compliance will be necessary to keep the County in alignment with these ongoing guidance changes through annual review following the adoption of the Comprehensive Plan.

Supporting documentation:

[2025 Whatcom County Projections Report](#)

3. Commissioner Barton moved to add the locations in Whatcom County where sea level height is measured. (Staff will decide what section this will be in). (8-0-0)

NOAA provides tidal surge data and [Relative Sea Level Trend](#) information from a gauge at Cherry Point. The Cherry Point tide gauge has been recording water level data since 1973. The relative sea level trend recorded over this period is 0.27 mm/yr, or 0.01 in/yr (i.e., 0.5 inches between 1973 and 2021). This is included as context as part of the description on page 12-30

under, “Countywide Forecasted Near-Term Climate Impacts section,” in the resilience subelement.

4. Commissioner Dunne moved to add after per capita, “In 2022, global emissions of Co2 were 36.8 billion metric tons” in the Background Summary on page 12-3. (8-0-0)

Amended the Background Summary to include the global emissions total 57.4 gigatons of CO2 equivalent in 2022 ([United Nations Environment Program](#)).

5. Commissioner Greif moved to amend policy 12.2.4 to include “hydroelectric, bio-based materials, nuclear, tidal, wave,” between “solar” and “and geothermal.” (8-0-0)

Policy 12.2.4 on page 12-5 revised from “bio-based materials” to “biomass” and will add a definition to the glossary, as follows, [biomass resources](#) are defined as that are “available on a renewable basis and are used either directly as a fuel or converted to another form or energy product are commonly referred to as “feedstocks” (U.S. Department of Energy).”

6. Commissioner Dunne moved to add, “Support the replacement of conventional refrigeration systems with appliances that use alternative refrigerants, reducing pollutants from leaking cooling systems” to policy 12.1.5. (7-1-0)

This revision to policy 12.1.5 on page 12-4 is consistent with Ecology’s [hydrofluorocarbon regulation](#) of refrigeration and air conditioning systems and use restrictions on certain hydrofluorocarbons at time of replacement. The Refrigerant Management Program (RMP) requires facilities with refrigeration and air conditioning systems containing more than 50 pounds of refrigerant with a GWP of 150 or more to conduct and report periodic leak inspections, promptly repair leaks; and keep service records on site. The rule also requires service practices intended to minimize refrigerant emissions. The RMP is designed to reduce emissions of high-global warming potential refrigerants from leaky refrigeration and air conditioning equipment, and reduce emissions from the installation and servicing of refrigeration and air-conditioning appliances. Replacing 75% or more of the evaporators (by number) and 100% of the compressor racks, condensers, and connected evaporator loads of an existing system would trigger the compliance requirements of new systems. In Washington, all new systems refrigerants must follow the GWP restrictions in Tables 2 and 3 once that threshold is reached. More specific compliance requirements are listed in WAC 173-443-040.

7. Commissioner Greif moved to add in the Introduction of the Greenhouse Gas Emissions Reduction subelement on page 12-3, “for exploration” after “policies.” (5-2-1)

The introduction to the greenhouse gas emissions subelement on page 12-3 as amended reads, “This sub-element provides an overview of greenhouse gas emissions sources in Whatcom County and includes a comprehensive set of goals and policies *for exploration* to reduce emissions associated with those sectors.

8. Commissioner Hansen moved to amend the first sentence on page 12-29, section Zoning and Development, to add “related” between “climate” and “hazards.” (5-3-0)

The description for the Zoning and Development sector in the resilience subelement on page 12-29 is amended to the following, “Zoning and development changes can build resilience to

climate impacts by limiting new development in areas at risk of flooding, wildfire, sea level rise, and other *climate-related* hazards.”

9. Commissioner Browne moved to change the wording “increase” to “encourage” in policy 12.4.5. (8-0-0)

Policy 12.4.5 on page 12-8 is amended to, “*Encourage* participation of qualified commercial, industrial, and multifamily properties in Whatcom County’s C-PACER (Commercial Property Assessed Clean Energy and Resilience Program) to finance energy efficiency, renewable energy, water conservation, and resilience projects.”

10. and 11. Commissioner Browne moved to strike out policy 12.8.6 and Commissioner Browne moved to add to the new 12.8.7, “prioritizing underserved and disadvantaged communities to ensure equitable access.” (6-0-2)

Removed, “Policy 12.8.6- Invest in the development and installation of a countywide electric vehicle charging network, prioritizing underserved and disadvantaged communities to ensure equitable access” (8-0-0)

Discussion regarding 12.8.6 on page 12-11 included questions regarding the probable funding source for infrastructure investment, specifically whether Whatcom County would act as a developer for electric vehicle infrastructure funded by property taxes. Removal of 12.8.6 on page 12-10 and amendment of 12.8.7 on page 12-11 resulted in the following amended policy.

Policy 12.8.7- Collaborate with regional partners to facilitate the expansion of electric vehicle (EV) infrastructure across Whatcom County, *prioritizing underserved and disadvantaged communities to ensure equitable access.*”

12. Commissioner Browne moved to strike “Oversee” to “Encourage” in policy 12.9.3. on page 12-12. (8-0-0)

Policy 12.9.3 on page 12-12 is amended as follows: *Encourage* the alignment of private waste haulers with the Whatcom County Comprehensive Solid and Hazardous Waste Management Plan to minimize waste generation and disposal emissions.

The waste management system in the County consists of approximately 35 permitted and exempt solid waste handling facilities, as regulated by WAC 173-350, Solid Waste Handling Facilities. These facilities consist of private sector landfills, landfills managed in post closure, transfer stations, drop box collection sites, moderate risk waste (MRW) fixed facilities, composting facilities, anaerobic digesters, biosolids facilities, and recycling operations. The solid waste system is largely privatized, and except for the MRW facility (called the Disposal of Toxics Program), the County neither owns nor operates collection, treatment, or disposal facilities.

13. Commissioner Browne moved to replace “ensure” with “require new buildings and encourage and incentivize existing buildings to be adapted” in policy 12.13.5. (6-2-0)

Policy 12.13.5 on page 12-18 is amended as follows: Update flood code to reflect climate exacerbated flooding and evaluate development regulations that restrict and regulate the design and location of buildings and infrastructure in flood-prone areas, and to the extent they

are allowed, *require new buildings and encourage and incentivize existing buildings* are adapted to withstand flooding, through standards related to elevation, floodproofing, improved drainage systems, and the protection of life and property.

Adopted Flood Construction Standards for residential and commercial construction can be found in [Whatcom County Code 17.16.80 and 17.16.90](#).

Planning Commission Amendments- September 30th

14. Commissioner Mocerri moved to strike the word “Revise” and replace with “Consider revising” in policy 12.9.5 on page 12-12. (8-0-1)

Policy 12.9.5 on page 12-12 is amended as follows: *Consider revising* Whatcom County’s Flow Control Ordinance (No. 91-041) to include the recycling of construction and demolition debris, promoting the reuse and recovery of building materials to reduce waste and associated emissions.

For more discussion regarding construction and demolition debris recycling see section 2C above.

15. Commissioner Dunne moved to amend 12.2.1. on page 12-5 to say “Continue to implement...” (9-0-0)

Policy 12.2.1 on page 12-5 is amended as follows: *Continue to* implement the Washington State Building Code’s requirements for residential and commercial construction, including space and water heating guidelines for eligible new commercial construction and energy efficiency targets for residential construction.

The 2021 Washington State Energy Code went into effect in March 2024. The updates to Section R406 included additional energy efficiency requirements compared to the previous 2018 energy code. These requirements included that each new single-family home built in Washington requires minimum energy credits beyond the prescriptive minimums based on its size (Section R406.3). Homes with combustible fuels, like natural gas, must obtain more energy credits than homes using electric heat pumps for space heating. The Washington state energy code preempts the residential energy code of each county in Washington ([RCW 19.27A.020](#)), except if the local code exceeds the requirements. The 2021 editions were adopted into Whatcom County Code Title 15 in April 2024 in [ORD 2024-019](#), as required by RCW Chapter 19.27.

16. Commissioner Dunne moved to strike out policy 12.2.9 on page 12-5. (6-2-1)

The removed policy language reads, “Policy 12.2.9- Advocate for updates to the Washington State Building Code to increase the energy efficiency of homes and buildings consistent with the 2009 SB 5854, “Energy First Bill.”

RCW as amended following Initiative Measure No. 2066 states that The Washington state energy code shall be designed to:

- (a) Construct increasingly energy efficient homes and buildings by the year 2031;

- (b) Require new buildings to meet a certain level of energy efficiency, but allow flexibility in building design, construction, and heating equipment efficiencies within that framework; and
 - (c) Allow space heating equipment efficiency to offset or substitute for building envelope thermal performance.
- (3) The Washington state energy code may not in any way prohibit, penalize, or discourage the use of gas for any form of heating, or for uses related to any appliance or equipment, in any building.

Based on [RCW 19.27A.160](#), the residential and nonresidential construction permitted under the 2031 state energy code must achieve a seventy percent reduction in annual net energy consumption, using the adopted 2006 Washington state energy code as a baseline. The state building code council will adopt state energy codes from 2013 through 2031 that incrementally move towards achieving the seventy percent reduction in annual net energy consumption. The council can defer the implementation of the energy code updates if economic, technological, or process factors would significantly impede adoption or compliance.

17. Commissioner Dunne moved to add policy 12.11.7 - Support the creation of Whatcom County wetland mitigation banks that can be used by public and private development on page 12-13. (8-0-1)

Policy 12.11.7 added on page 12-13 in Zoning and Development section of GHG Mitigation Subelement.

The state wetland mitigation bank rule in WAC 173-700 identifies the criteria necessary for implementing and operating a wetland mitigation banking system in Washington. Commissioner Browne added a friendly amendment to amend “bank” to “banks” to clarify that most mitigation banks are set up by sub basin.

18. Commissioner Browne moved to add “with treaty rights or interests in the project area” to policy 12.3.1 on page 12-6. (9-0-0)

Policy 12.3.1 is amended as follows, “Policy 12.3.1- At the earliest possible date prior to submittal of an application to receive funds from Climate Commitment Act accounts, Whatcom County will consult with the Department of Archaeology and Historic Preservation, Department of Fish and Wildlife and all interested federally recognized Tribes *with treaty rights or interests in the project area* in accordance with RCW 70A.65.305.

Staff Discussion Related to Comment Letters Received:

Futurewise- Forecasted VMT per capita by UGA -

As stated in [RCW 36.70A.070\(9\)\(d\)\(ii\)](#), a jurisdiction may not restrict population growth or limit population allocation in order to reduce its emissions and per capita vehicle miles traveled (VMT) within the jurisdiction. Transportation strategies anticipated to reduce transportation emissions or per capita VMT are included in the Climate Element (GHG subelement, Transportation sector). Commerce considers policies proposed in each jurisdiction's climate element consistent with the intermediate guidance if proposed policies are projected to achieve greenhouse gas emissions reductions or per capita vehicle miles traveled reductions. Each of the policies proposed is anticipated to reduce countywide transportation emissions or per capita VMT and is subject to evaluation and review through the annual review process.

Commerce required that countywide Highway Performance Monitoring System VMT estimates produced by WSDOT were included in the 2022 Whatcom County Greenhouse Gas Inventory over forecasted VMT from the designated Regional Transportation Planning Organization (RTPO), Whatcom Council of Governments. The WCOG model was not included in the Commerce greenhouse gas emissions inventory due to additional VMT sensitivity tests and validation against regional VMT data prior to inclusion. The designation of the HPMS data source for vehicular trips in the state contracted countywide greenhouse gas emissions inventory has created inconsistency between traffic forecasting data utilized for development of various components of the Comprehensive Plan, including the multimodal level of service standard in the transportation element (WCOG), countywide transportation emissions data cited in the climate element (WSDOT), per capita VMT data by jurisdiction (WSDOT), and data utilized for the development of the regional transportation plan (WCOG).

The GMA and Transportation element guidance recommends that jurisdictions individually and regionally use consistent "land use assumptions used in estimating travel" for the Countywide Planning Policies, Land Use element, Transportation element. Statewide guidance regarding traffic estimation methodology for new transportation and climate requirements is not currently available. This gap is particularly relevant as not every jurisdiction in Whatcom County is subject to the climate planning requirements for greenhouse gas emissions reduction. Locally and as required by the GMA, the draft Countywide Planning Policies designate WCOG as the RTPO designated to conduct regional, cooperative transportation planning and regional consistency in transportation planning approaches. This incongruence in VMT per capita and transportation emissions estimation methodologies will require additional state direction and additional coordination with WCOG after the Comprehensive Plan adoption.

The current intermediate climate guidance and draft HB 1181 rulemaking does not address or discuss any changes to RCW 36.70A.110 relating to changes to UGAs, designate authoritative data for VMT per capita by jurisdiction, or provide recommended policy approaches to increase housing capacity in urban growth areas to reduce transportation emissions. RCW 70A.45.120(c) provided the authority to Commerce to include in the specified guidelines what additional measures cities and counties should take to make additional progress on local emission reduction goals, including any measures that increase housing capacity within urban growth areas. This may be addressed in the final guidance, but is not currently addressed in the intermediate guidance.

According to [WSDOT's Implementing VMT Targets 2024 Interim Report](#), there is no law establishing per capita VMT reduction targets at the local level. Based on last available WSDOT data, in 2022, Whatcom County was one of ten counties below under the state VMT target countywide. WSDOT is undergoing a process to develop per capita VMT reduction strategies for rural areas like unincorporated Whatcom County where Commute Trip Reduction regulations are not required and transit is only provided as a limited, flexible service. Based on transportation emissions modelling conducted for the climate element, expanded transit service could result in a maximum of 31,550 MTCO₂e in emissions reductions by 2040, predominantly within Bellingham city limits, which would represent a reduction of only 4.3% of the existing 2022 countywide transportation emissions total of 739,762 MTCO₂e. This offset would not be sufficient to drive overall emissions decreases on a per capita basis. These modelled emissions reductions are consistent with the past transit trip counts, as transit represent 3% of total trips countywide (Way to Go Whatcom 2045).

Given that these topics are not currently addressed in the guidance that the County is subject to in this Comprehensive planning cycle, revisions in the future could be necessary as part of the review and evaluation cycle. All RCWs reviewed, including RCW 36.70A.110, RCW 36.70A.070(1), and intermediate guidance do not provide review criteria for UGA changes related to forecasted increases in per capita miles traveled within UGAs or minimum requirements to address forecasted increased per capita vehicle miles traveled in unincorporated areas. Further work is necessary to differentiate aggregate VMT per capita totals by home based and employment-based trips. As [illustrated by Streetlight data](#), there is regional variation per capita VMT estimates across Whatcom County and different strategies may be appropriate for each jurisdiction and land use context.

The legislature directed Commerce to adopt rules setting minimum standards for compliance with HB 1181 requirements, including per capita VMT change and publish full guidance by Dec. 31, 2025. The legislature also directed that the Department of Transportation maintain a summary of the per capita VMT for cities and unincorporated portions of counties and work with Commerce, Ecology, and RTPs to develop, "measurement tools that can, with a high level of confidence, measure annual progress toward the benchmarks at the local, regional, and state levels." As this work is not yet completed, in the interim, staff has proposed Policy 12.8.2- Work with Whatcom Council of Governments and cities to establish and track local and regionally coordinated per capita VMT reduction goals and policies consistent with the statewide reduction targets in RCW 47.01.440."

Western States Petroleum Association- CCA Compliance for Covered Entities

The letter from the Western States Petroleum Association states that, "it is important that the County recognize the Climate Commitment Act as the governing framework for greenhouse gas mitigation, compliance instruments, and covered entities." Proposed policy 12.4.2 is consistent with the letter and recognizes, "Consistent with the Climate Commitment Act, support covered industries' participation in the Washington State cap-and-invest market." Changes to the GMA do not clearly authorize any additional local regulatory authority over greenhouse gas emissions, though trends will be tracked countywide consistent with the function of counties as a "regional government" ([RCW 36.70A.210](#)). The identification of policies in the climate element are those initially determined to be within the County's powers to lead or support, consistent with the directive to WA State Department of Commerce in the state operating budget to develop intermediate guidance for development of climate element

guidance for the comprehensive plans and development regulations that are within jurisdiction's existing statutory authority.

Development regulations or "regulation" in the GMA refer to the controls placed on development or land use activities by a county or city, including, but not limited to, zoning ordinances, critical areas ordinances, shoreline master programs, official controls, planned unit development ordinances, subdivision ordinances, and binding site plan ordinances. A development regulation does not include a decision to approve a project permit application, as defined in RCW 36.70B.020. While Commerce recommends aligning and tracking countywide emissions with statewide target, the climate element is intended to guide the development of regional policies, plans, and strategies. Any countywide emissions tracking to determine local or regional trends serves a different communitywide planning function separate from regulatory emissions reporting requirements to Ecology for covered industries under the CCA.

This chapter does not prescribe or recommend any specific approaches to permit or licenses required for project actions for industries regulated under the Climate Commitment Act. Related to congruence to other federal and state environmental laws, current requirements related to projects requiring SEPA review is outlined in [Whatcom County Code Chapter 16.08](#). That section states that, "many of the environmental impacts addressed by these SEPA policies are also the subject of federal, state and regional regulations. In deciding whether a project specific adverse environmental impact has been adequately addressed by an existing rule or law of another agency with jurisdiction, the county shall consult orally or in writing with that agency and may expressly defer to that agency. In making this deferral, the county shall base or condition its project approval on compliance with these other existing rules or laws. The county shall not so defer if such regulations did not anticipate or are otherwise inadequate to address a particular impact of a project or would be less restrictive than county code."

SEPA review as it relates to climate and air quality as enacted applies "to projects that: (1) are expansions of fossil fuel refineries and fossil fuel transshipment facilities, as defined in WCC [20.68.153](#) and [20.68.154](#), or new, or expansion of renewable fuel refineries and renewable fuel transshipment facilities; and (2) will have reasonably foreseeable, probable, direct greenhouse gas emissions resulting from new or modified equipment of greater than 10,000 MT/year (CO₂e) as determined by the Northwest Clean Air Agency using methodology consistent with 40 CFR § 98.253, Calculating GHG Emissions (for Petroleum Refineries), and 40 CFR § 98.33, Calculating GHG Emissions (for Stationary Fuel Combustion Sources). Any subsequent changes to the code would be docketed separately and are not specifically identified as part of this new climate element.

Staff Report Addendum- Commerce Measure compared to policy topics discussed in climate element

Policy Topic	Commerce Measure (CM)- Greenhouse Gas Reduction Subelement- Examples
Agrivoltaic	X
Operational Efficiency (pesticide, fertilizer, fuel use reduction)	Promote the sale and use of agricultural supplies, pesticides, fertilizers, and fuels that are not derived from fossil fuels.
Local food security/ access	X
VMT reduction- local distribution networks & processing	Establish local distribution networks for agricultural supplies, services, and products to decrease transport emissions from import and export.
Alternative refrigerants	X
Manure management/ methane capture	Require methane collection on dairy farms and other agricultural operations that utilize waste ponds.
Efficient irrigation	Utilize water conservation methods and technologies in development of irrigation infrastructure so as to foster climate resilience.
Electrification- Fuel switch from NG, propane, fuel oil	Retrofit buildings for energy efficiency.
Energy efficiency- Clean Buildings Act, retrofits/ audits	X
Energy insecurity/ access	X
Energy storage (DERs, microgrids, demand response)	Develop local microgrid solar and battery storage facilities in low-impact sites.
Renewable/ lower carbon energy (solar/ wind/ geothermal/ green hydrogen, biofuels, hydropower)	Maximize renewable energy sources for the supply of electricity and heat to new and existing buildings.
Renewable/ lower carbon energy (solar/ wind/ geothermal/ green hydrogen, biofuels, hydropower)	Facilitate the development of community-owned, small-scale renewable energy generation projects.
CETA/ transmission & distribution	X
Energy code, building materials (preservation), Green building standard	Incentivize green building certification to improve energy and environmental performance
Energy code, building materials (preservation), Green building standard	Prioritize the use of lower-carbon building materials in new construction and building retrofits to reduce embodied carbon, Prioritize the adaptive reuse of buildings, recognizing the emission-reduction benefits of retaining existing buildings.
Renewables siting	Direct solar development onto lands identified as having “least conflict” through the Least-Conflict Solar Siting process.
Energy siting & operations	X
Industrial siting & operations	Prohibit the expansion of polluting industries in overburdened communities via local zoning and development regulations.
Land use conversion	X
Transportation siting & operations (infrastructure/ transit/ marine/ rail/ aviation)	X
Tribal relationships (Gov to Gov)	X
Commercial sector GHG reduction (efficiency, operations change, offsets)	X
Industrial sector- GHG reduction (efficiency, operations change, offsets)	Promote local industrial development to support a circular economy that increases demand for reused and recycled materials and reduces demand for new raw materials and their embodied carbon emissions.

Energy financing- shift investment from carbon intensive energy sources	X
EDI incentives- broadband, renewables, business growth	Invest in broadband infrastructure.
Production, distribution, and transportation of goods	Promote purchasing from local businesses to support economic development and reduce emissions associated with the transportation, production, and distribution of goods.
Workforce Development/ Retraining	Facilitate a green jobs pipeline for frontline communities, Support workers displaced from carbon-intensive industries.
Aquatic Ecosystems	Identify, protect, and restore submerged aquatic vegetation (eelgrass, kelp, etc.) that provides aquatic habitat, "blue" carbon storage, and other ecosystem services.
Greenspace/ Greenways	Require open space set-asides (such as parks) for new development.
Greenspace/ Greenways	Establish a green belt of parks to support connectivity and non-motorized travel between housing, schools, and businesses across a community.
Tree Canopy	Increase tree canopy cover to boost carbon sequestration, reduce heat islands, and improve air quality, prioritizing overburdened communities.
Tree Canopy/ Forest Management	Create and support natural resource management plans that address existing stressors, consider climate change impacts, emphasize taking a precautionary approach to reduce risk of environmental harm, and guide adaptive management, improve and expand urban forest management to maximize or conserve carbon storage, maintain small forestland ownership and publicly owned forest properties with carbon sequestration as the goal.
Avoid conversion of forests, grasslands, wetlands	Maintain and manage natural lands (forests, grasslands, wetlands) to maintain or increase their carbon concentrations and avoid conversion of carbon-rich ecosystems.
Energy infrastructure reliability	X
Transportation reliability- transit for evacuation	Improve street connectivity and walkability, including sidewalks and street crossings, to serve as potential evacuation routes.
Air quality- reduce tailpipe emissions/ transportation access	X
Energy & Utility Access/ insecurity	Provide overburdened communities subsidies to offset potential cost increases associated with conversion to non-fossil-fuel energy sources.
Food Access/ Insecurity	Expand local food security and the food-related economy to address climate impacts and increase access to healthy, affordable, and climate-friendly foods.
VMT reduction	Implement travel demand management (TDM) programs and strategies.
VMT reduction	Reduce vehicle miles traveled to achieve greenhouse gas reduction goals.
Freight (medium/ heavy duty)- decarbonization, reduction VMT	Provide signal prioritization for freight vehicles, transit buses, and other heavy-duty vehicles.
EVs- infrastructure, registration (vehicles, bikes, ferries, buses)	Expand electric vehicle infrastructure.
Multimodal- utilization, infrastructure	Create a safe, well-connected, and attractive bicycle and pedestrian transportation network to encourage active transportation.
Multimodal- utilization, infrastructure	Address active transportation and other multimodal types of transportation options in concurrency programs – both in assessment and mitigation.
Multimodal- utilization, infrastructure	Implement multimodal transportation planning to reduce single-occupancy vehicle dependence and greenhouse gas emissions.
Off-road equipment- reduce fuel use	Phase out the use of use of gas-powered landscaping equipment.
Transit- increase frequency, utilization	Prioritize and promote public transit expansion and use through coordination of land use and transportation planning.
Transit- increase frequency, utilization	Improve transit speed, frequency, coverage, and reliability.
Aviation- decarbonization of fuel, reduction of fuel use	X

Marine & Rail- decarbonization	X
Transportation infrastructure (roads, bridges)- embodied carbon	Use recycled materials in the construction of transportation and other infrastructure facilities.
Waste transport & processing & disposal emissions	X
Refrigerants reduction	X
Solid waste reduction	Reduce municipal solid waste disposed of in landfills by [insert percentage] by [insert target date].
Solid waste reduction	Ensure that the community is able to reduce, reuse, and recycle waste materials sustainably.
Solid waste diversion (compost/ recyclables)	Recycle all paper, food, textile, and metal waste by [insert target date].
Solid waste diversion (compost/ recyclables)	Increase staff and facility capacity for composting programs to divert [insert percentage] of community organic waste from entering landfills.
Construction materials	Develop a program that will enable recycling of all construction and demolition debris by [insert target date]. Minimize carbon emission impacts of building demolition with best available recycling strategies. Incentivize recycling of construction and demolition debris.
Methane (wastewater treatment, septic)	Require methane capture processes from wastewater treatment facilities.
Wastewater efficiency/ treatment	X
Water conservation/ efficiency- irrigation, industrial, commercial, residential	Manage water resources sustainably in the face of climate change through smart irrigation, stormwater management, preventative maintenance, water conservation and wastewater reuse, plant selection, and landscape management.
Agricultural conversion	X
Building codes	X
Compact/ infill development- UGAs (infrastructure siting, transportation proximity, service area)	Maintain a stable urban growth area to reduce development pressure on rural and resource lands.
Compact/ infill development- UGAs (infrastructure siting, transportation proximity, service area)	Allow middle housing types, such as duplexes, triplexes, and ADUs, on all residential lots.
Compact/ infill development- UGAs (infrastructure siting, transportation proximity, service area)	Facilitate the siting of complimentary destinations such as commercial-employment centers, schools or education centers, and residential developments. Establish form-based codes where appropriate to better integrate higher-density development.
Compact/ infill development- UGAs (infrastructure siting, transportation proximity, service area)	Prioritize permitting for transit-oriented development (TOD) proposals. Increase multimodal capacity in coordination with the location of higher-density housing and commercial centers. Increase or remove density limits in areas well-served by transit and other services within the urban growth area.
Forest conversion	X
Wetland conversion	X

Policy Topic	Commerce Measure (CM)- Resilience Subelement- Examples
Agricultural diversity (invasive pests, animal disease)	Support the local agricultural sector's efforts to adapt to changing climate conditions and capitalize on sustainable business opportunities.
Climate friendly practices- carbon sinks, soil carbon storage, agroforestry, regenerative agriculture, aquaculture	Support long-term local and regional agriculture that sequesters carbon.
Climate friendly practices- carbon sinks, soil carbon storage, agroforestry, regenerative agriculture, aquaculture	Facilitate and enable regenerative agriculture and regenerative ocean farming where practicable.
Disruption of agricultural goods & services	X
Water availability (conservation/ augmentation) & temperature & saltwater intrusion	Identify and implement strategies to prepare for and mitigate the effects of saltwater intrusion into aquifers and drainage systems.

Water storage/ stream flow (irrigation efficiency, floodplain connectivity)	Coordinate with local, regional and state partners to develop and implement a comprehensive strategy to increase water storage for agricultural purposes that will ensure storage has neutral or positive environmental benefits and does not negatively impact fish and other core environmental requirements.
Soil erosion, land loss, agricultural runoff	Support conservation programs and resources that provide direct financial assistance to farmers to implement best management practices that address impacts of climate change, increase capacity for conservation technical assistance, especially related to climate-smart soil health or organic practices.
Energy infrastructure- resilience to impacts/ transmission & distribution reliability, wildfire impacts	Ensure that energy infrastructure — including generation and transmission — is able to accommodate renewable energy opportunities and to withstand and recover quickly from the impacts of extreme weather and other natural hazards worsened by climate change.
Energy infrastructure- resilience to impacts/ transmission & distribution reliability, wildfire impacts	Work with energy utilities to improve the safety and reliability of infrastructure vulnerable to climate change, require new subdivisions to bury electricity transmission lines and associated infrastructure to reduce damage from storms and wildfire ignition risks.
Energy demand- increased temperatures	Design buildings for passive survivability to ensure that they will stay at a safe temperature for occupants if the power goes out, Develop and maintain a program to distribute cooling units and install heat pumps, prioritizing households with residents (e.g., low-income seniors) most vulnerable to extreme temperature events.
Distributed generation for public/ emergency facilities	Install distributed renewable energy generation and battery infrastructure at public facilities to store renewable electricity generated on site and provide emergency power that ensures continuity of operations.
Flooding (facilities, utilities, infrastructure)- siting, relocation, adaptation	Require the design and construction of commercial and residential buildings and their surrounding sites to reduce and treat stormwater runoff.
Wildfire- siting, relocation, adaptation	Adopt fire-resilience standards for new and redeveloped sites in high-risk wildfire areas.
Landslides- siting, relocation, adaptation	X
Sea Level Rise- siting, relocation, adaptation	Plan and build facilities, utilities, and infrastructure projects to avoid or withstand flooding from rising sea levels and associated climate impacts (e.g., changing floodplains).
Extreme cold- shelter	X
Extreme heat/ smoke- cooling capacity, filtration	X
Archaeological resources (artifacts, site erosion)	Ensure that cultural resources and practices — including significant historic sites and culturally important traditional foods and natural resources — are resilient to the impacts of extreme weather and other natural hazards worsened by climate change.
Buildings & structures (damage/ loss of structures)	Protect significant historic sites prone to floods or other hazards worsened by climate change, Identify and plan for climate impacts to valued community assets such as parks and recreation facilities, including relocation or replacement.
Cultural landscapes (roads, trails, landscape features)	Protect, enhance, and restore ecosystems in order to meet tribal treaty rights and conserve culturally important consumptive and non-consumptive resources including foods, medicinal plants, and materials that could be adversely impacted by climate change.
Ethnographic resources (culturally relevant species, habitat loss significant species)	Take inventory of and protect climate refugia and habitat connectivity needs for species under stress from climate change.
Tribal relationships (Gov to Gov)	Establish and maintain government-to-government relations with Native American tribes for the preservation of archaeological sites and traditional cultural properties that are vulnerable to climate impacts.
Economic Development Planning	Ensure that the jurisdiction's Comprehensive Economic Development Plan responds to the impacts of climate change and identifies roles and responsibilities to support a sustainable economic recovery after a disaster, support local businesses' efforts to bolster climate preparedness and continuity of operations.

Agricultural sector	Ensure that the local agricultural economy — including food and materials producers, distributors, and sellers — is resilient to the impacts of extreme weather and other natural hazards worsened by climate change.
Port District	X
Maritime Industry	X
Timber Industry	X
Industry- shoreline/ floodplain relocation	Address rising sea water by siting and planning for relocation of hazardous industries and essential public services away from the 500-year floodplain.
Financing	X
Utility transmission/ distribution/ reliability	X
Coastal Ecosystems (Estuary/ Marine)- protect/ restore- coastal and nearshore, aquatic vegetation	Protect and restore watershed-scale processes to maximize the ecological benefits and climate resilience of riparian ecosystems.
Coastal Ecosystems (Estuary/ Marine)- protect/ restore- coastal and nearshore, aquatic vegetation	Protect and restore coastal ecosystems to increase the resilience of species, habitats, and communities to climate change, consider sea-level rise in coastal and nearshore habitat restoration projects, Assess the sea level rise vulnerability of wetlands, aquatic vegetation, beaches and dunes, and other valuable natural assets and collaborate with landowners and partners to support adaptation.

Note: The list was developed to provide examples of policy language included in the WA Department of Commerce Menu of Measures. WA Department of Commerce may have added, revised or removed example measures since last accessed in August 2025. For a current resource, visit: [WA Department of Commerce Climate Policy Explorer](#).