

# Business Coalition Comprehensive Plan Amendments

*My attempt at addressing the Business Coalition Housing, Permitting, Regulatory Certainty, and Implementation Concerns to a Cleaner Policy Package*

The business coalition comments repeatedly raise several connected implementation concerns: predictable permitting, clear timelines, reduced duplication, objective standards, cost and feasibility impacts, coordinated review, and clear decision-making authority. Those themes appear across Chapter 3 housing policies and also recur in industrial lands, utilities, economic development, environmental review, critical areas, shoreline, Tribal coordination, and mitigation policies. The cleanest approach may not be to add similar qualifying language to every affected policy. Instead, I'm proposing a broad implementation goal and a small set of supporting policies that apply consistently across the plan, with a Chapter 3 companion amendment for housing. This preserves the housing, environmental, equity, and consultation goals while clarifying how those goals should be implemented: transparently, predictably, efficiently, and with clear authority and measurable standards.

## Proposed amendment package to address broader themes...

### Preferred placement: Chapter 1, countywide implementation goal

#### **Goal 1X - Effective, Predictable, and Coordinated Implementation**

Whatcom County shall implement this Comprehensive Plan through transparent, coordinated, predictable, and efficient regulatory and permitting processes that protect public interests, maintain clear decision-making authority, utilize objective standards where practicable, and reduce unnecessary delay, duplication, uncertainty, and cost.

- **Policy 1X-1 - Clear expectations and timelines:** County regulations and permitting processes should be clear, understandable, consistently administered, and supported by defined procedures, review timelines, and transparent application requirements whenever practicable.
- **Policy 1X-2 - Coordinated and nonduplicative review:** The County should coordinate review processes among departments, municipalities, Tribal governments, agencies, and stakeholders to avoid unnecessary duplication, conflicting requirements, and procedural delay.
- **Policy 1X-3 - Clear decision-making authority:** The County shall encourage consultation, collaboration, and government-to-government coordination consistent with applicable law while maintaining clear decision-making authority and jurisdictional responsibilities established by state and federal law.
- **Policy 1X-4 - Feasibility and public outcomes:** Implementation of this Plan should consider impacts on housing affordability, housing supply, project feasibility, economic opportunity, infrastructure investment, environmental stewardship, and family-wage employment.
- **Policy 1X-5 - Objective and measurable standards:** Regulations should be implemented through objective, measurable, and consistently applied standards whenever practicable, using defined criteria and best available information appropriate to the decision being made.
- **Policy 1X-6 - Accountability and continuous improvement:** The County should periodically evaluate permitting performance, review timelines, regulatory effectiveness, and implementation outcomes and pursue improvements that increase predictability, accountability, and administrative efficiency.

### Chapter 3 companion language

If Council prefers to keep the amendment in the Housing Chapter, revise Goal 3A rather than creating a separate new Goal 3X. This avoids the amendment duplicating the existing permitting-efficiency concept, while still preserving the broader implementation framework.

### Revised Goal 3A - Housing Permitting, Affordability, and Regulatory Certainty

Provide housing opportunities through clear, predictable, coordinated, and timely housing-related permitting processes that reduce unnecessary delay, cost, and duplication while supporting housing affordability, housing production, public participation, consistent application of adopted regulations, and clear decision-making authority.

- **Policy 3A-X - Predictable permitting:** The County shall implement housing-related regulations through transparent and predictable procedures, defined review timelines, coordinated interdepartmental review, clear application-completeness standards, and consistent interpretation of adopted development regulations.
- **Policy 3A-Y - Housing feasibility:** The County shall consider the effect of new regulations, fees, mitigation requirements, and permitting processes on housing affordability, housing supply, project feasibility, and the ability to deliver timely housing production.
- **Policy 3A-Z - Collaboration and authority:** The County shall encourage collaboration with municipalities, Tribal governments, agencies, community organizations, and stakeholders while maintaining clear decision-making authority consistent with applicable law.

### How the proposed package addresses amendment groups

Concern group	Primary proponents	Related amendment item numbers	Addressed by proposed language	Assesment
Predictability, regulatory certainty, and timelines	AGC, BIAWC/WCAR, WCAR, BP, AltaGas	1, 9-10, 19, 23, 33, 35, 38-39, 45, 47-48, 55, 62, 67-70, 81, 84, 85, 96-101, 106	Goal 1X; Policies 1X-1, 1X-2, 1X-5, 1X-6; revised Goal 3A; Policy 3A-X	Consolidates the repeated request for predictable timelines, defined procedures, and reduced uncertainty into one implementation framework.
Clear decision-making authority and consultation roles	AGC, BP, AltaGas, P66	1, 15, 22, 36-37, 47, 49, 56, 67, 70, 74, 76, 85, 87-88, 99	Policy 1X-3; Policy 1X-2; Policy 3A-Z	Maintains consultation and coordination while clarifying that consultation does not create additional approval authority unless required by law.
Cost, affordability, housing supply, and project feasibility	AGC, BIAWC/WCAR, WCAR	13, 17-18, 21, 29-32, 42-46, 48, 60, 63, 75, 77-80, 102-105, 107	Policy 1X-4; revised Goal 3A; Policy 3A-Y	Frames feasibility as part of housing affordability, infrastructure delivery, and public outcomes rather than as a narrow industry concern.
Objective standards and measurable criteria	AGC, BP, AltaGas, WCAR	12, 18, 35, 48, 54, 59, 68-69, 73-78, 80-81, 84, 96-98, 101, 104-106, 108	Policy 1X-5; Policy 1X-1	Does not eliminate substantive review; it asks that standards be objective, measurable, consistently applied, and tied to defined criteria where practicable.
Duplication and cumulative regulatory burden	AGC, WCAR, BP, AltaGas	28, 33, 35, 38, 47-48, 55, 68-70, 72, 81, 84, 86, 89, 91, 93-98, 100-101, 108	Goal 1X; Policies 1X-2, 1X-5, 1X-6	Provides a cleaner response to repeated concerns about layered review, overlapping standards, duplicative processes, and inconsistent chapter placement.
Industrial, employment-land, energy, and infrastructure readiness	AGC, AltaGas, BP, P66	2-8, 11-14, 16, 20-22, 24, 40-42, 50-61, 66, 71, 81, 83	Policy 1X-4; Goal 1X; Policy 1X-2	Partially addressed by feasibility and coordinated-review language; site-specific industrial and energy amendments may still need separate consideration.
Countywide accountability and continuous improvement	AGC, AltaGas	52, 55, 62-63, 66-72, 100, 102-107	Policy 1X-6; Policy 1X-4	Adds a practical way to measure whether implementation is producing housing, jobs, infrastructure, investment, and timely review outcomes.

## Chapter 3 / housing-focused items

Items	Group / proponent	Policy area	Concern summarized	Proposed language	Assessment
23	BIAWC/WCAR - Eskridge	Goal 3A	Clarify predictability components for permits: review timelines, regulatory interpretation, application outcomes, and cost reduction.	Revised Goal 3A; Policy 3A-X; Policies 1X-1 and 1X-6	Covered directly; use a Goal 3A revision or cross-reference to avoid duplicating existing housing-permit efficiency language.
25	BIAWC/WCAR - Eskridge	Policy 3A-1	Coordinate zoning, regulations, and permitting in UGAs with neighboring municipalities.	Policy 1X-2; Policy 3A-Z	Covered if municipal coordination is expressly included.
28	WCAR - Eskridge	Policy 3K-8	Concern that County fair housing efforts duplicate federal/state and REALTOR processes.	Policy 1X-2; Policy 1X-6	Partially covered by anti-duplication and effectiveness review language; may still require targeted removal/revision.
29	BIAWC/WCAR - Eskridge	Policy 3F-1	Development agreements should include County concessions, not just new project costs, in exchange for affordability factors.	Policy 1X-4; Policy 3A-Y	Covered as project feasibility, housing affordability, and balanced public outcomes.
30-32	BIAWC/WCAR - Eskridge	Policies 3J-3 and 3K-2	Separate homeownership goals from tenant-protection goals; avoid deterring rental housing investment.	Policy 1X-4; Policy 3A-Y	Partially covered; specific tenant-protection language may still need targeted edits.
33	WCAR - Eskridge	Policy 3K-5	Shared decision-making language could add delay, costs, or legal challenge opportunities.	Policy 1X-3; Policy 1X-2; Policy 3A-Z	Covered by clear authority, nonduplicative review, and defined decision roles.
35	WCAR - Eskridge	Policy 3K-7	Equity impact analysis could add months or years, large costs, and unclear administrative burdens.	Policy 1X-5; Policy 1X-1; Policy 3A-X	Covered by objective standards, defined timelines, and predictable procedures; specific scope may still need editing.
36-37	AGC - Calloway	Goal 3K / Housing Stability	Maintain clear decision authority and predictable permitting authority.	Policy 1X-3; Policy 3A-Z	Covered directly.
38	AGC - Calloway	New chapter-wide policy	Prioritize predictable, coordinated, time-bound permitting that minimizes costs and delays.	Goal 1X; Policies 1X-1 through 1X-6; revised Goal 3A	This is the core concept being consolidated and expanded.
39	AGC - Calloway	Policy 3A-1	Simplify and modernize permitting with timelines and accountability.	Policy 1X-1; Policy 1X-6; Policy 3A-X	Covered directly.
40-41	AGC - Calloway	Policies 3B-4 and 3B-5	Balance housing location with industrial land protection and job-producing uses.	Policy 1X-4; revised Goal 3A	Covered broadly; site-specific industrial compatibility language may still be needed.
42-45	AGC - Calloway	Policies 3C-9, 3D-1, 3F-1, 3G-6	Land supply flexibility, economically feasible development, streamlined codes, and minimized cost impacts.	Policy 1X-4; Policy 3A-Y	Covered directly as feasibility and housing supply.
46	AGC - Calloway	Policy 3J-4	Balance equitable benefits with economic growth, private investment, and jobs.	Policy 1X-4	Covered broadly.
47-49	AGC - Calloway	Policies 3K-5, 3K-7, 3K-9	Avoid duplicative processes; ensure proportional analysis; consult without extra approval authority.	Policies 1X-2, 1X-3, 1X-5; Policy 3A-Z	Covered directly.

## Cross-chapter implementation items

Items	Group / proponent	Policy area	Concern summarized	Proposed language	Assessment
1, 85	BP - Lienhart	Tribal engagement / resources	Poorly defined expanded Tribal engagement and bespoke terminology could create uncertainty and delay.	Policy 1X-3; Policy 1X-5	Partially covered by clear authority and objective standards; terminology may still need targeted edits.
5-7, 50-52	AltaGas - Doyle	Cherry Point / energy transition	Support modernization, logistics, responsible energy systems, and periodic updates without treating every investment as expansion.	Policy 1X-4; Policy 1X-6	Partially covered by feasibility and regulatory effectiveness language; specific Cherry Point language remains separate.
11-14, 16, 20-22	AGC - Calloway	Industrial land supply / compatibility	Protect viable industrial lands, clarify disclosures, avoid vague standards, and preserve industrial/employment capacity.	Policy 1X-4; Policy 1X-5	Broadly covered; some policy-specific industrial land language may still be needed.
55	AGC - Calloway	Policy 5D-1	Defined timelines, consolidated review, and priority processing for housing and industrial development.	Goal 1X; Policies 1X-1, 1X-2, 1X-6	Covered countywide if placed in Chapter 1.
56, 67, 70, 76, 99	AGC - Calloway	Tribal / agency coordination	Define consultation timelines and roles; avoid duplicative approval layers; preserve local permitting authority.	Policy 1X-3; Policy 1X-2	Covered directly.
60-61, 75	AGC - Calloway	Water availability / supply	Avoid using water policy as an absolute barrier where phased infrastructure or balanced allocation can address need.	Policy 1X-4; Policy 1X-5	Partially covered; technical water policy edits may still be needed.
62-63	AGC - Calloway	Competitiveness / economic impacts	Measure permit timelines, cost reduction, approval metrics, job creation, housing supply, and tax base impacts.	Policy 1X-6; Policy 1X-4	Covered and strengthened by accountability language.
66, 71	AGC - Calloway	Industrial site readiness	Encourage infrastructure funding, pre-permitting, shovel-ready and permit-ready industrial land.	Policy 1X-4; Policy 1X-6	Partially covered; substantive industrial land supply amendments may still be warranted.
68-69	AGC - Calloway	Mitigation tools	Use mitigation banks and credits to reduce permitting timelines, risk, uncertainty, and costs.	Policy 1X-2; Policy 1X-5; Policy 1X-6	Covered as implementation principle; program details need separate work.
73-74, 86, 89, 91, 93-95, 108	BP - Lienhart	Environmental / shoreline / critical area duplication	Remove or revise policies that duplicate, conflict with, or exceed existing regulatory frameworks.	Policy 1X-2; Policy 1X-5	Partially covered by nonduplication and objective standards; many of these still require targeted technical edits.
96-98	AltaGas - Doyle	Critical areas / conservation terms	Unclear or undefined terms such as regulatory backstop, regulatory consequences, net gain, and climate hazards create uncertainty.	Policy 1X-1; Policy 1X-5	Covered as a general drafting principle; exact language should still be fixed where undefined.
100-101	AGC - Calloway	Permit process / regulatory backstop	Use maximum review timelines, coordinated review, documented determinations, metrics, and public review before expanded regulation.	Policy 1X-1; Policy 1X-2; Policy 1X-5; Policy 1X-6	Covered directly.
102-107	AGC - Calloway	Chapter 10 economic and environmental standards	Require documented economic analysis, protect housing and jobs, allow mitigation flexibility, and use clear standards.	Policy 1X-4; Policy 1X-5	Covered broadly; policy-specific amendments may still be needed for legal/technical precision.

These amendments do not remove housing, equity, environmental, public participation, or Tribal coordination goals. They clarify how those goals should be implemented. The business coalition comments repeatedly raise concerns that separate policies could layer new process, cost, uncertainty, and unclear authority onto already difficult housing, infrastructure, and permitting. Rather than repeating similar qualifiers throughout the plan, I'm proposing we consolidate the principles into one clear implementation framework: predictable timelines, coordinated review, objective standards, feasibility awareness, accountability, and clear decision-making authority. This should make the plan easier to administer and easier for applicants, staff, Tribes, cities, agencies, and the public to understand. If placed in Chapter 1, it becomes a plan-wide implementation standard and better addresses repeated concerns in Chapters 5, 7, 8, 10, and 12. Some requests still require targeted edits, especially where the coalition asks to remove a specific sentence, resolve a specific technical conflict, or clarify a unique term. This package reduces repetition; it does not automatically replace every amendment. I will send spreadsheet that will attempt to lay out what still could be addressed...my goal is to address these concerns in as timely a fashion as we can. I take very seriously these amendments as they come directly from the boots on the ground folks who are actually doing the things we address in this plan and they should be given a hard look if we want a better outcome.

## Business Coalition Amendment Crosscheck

**Purpose:** This crosscheck uses Kiana's PDF of the Business Coalition packet numbering (1-108) and compares each item to the proposed Elenbaas Implementation policy goals. It is intended to show which concerns are absorbed by the framework and which may still require targeted edits or separate policy decisions.

**Framework assumed:** countywide implementation language emphasizing predictable and coordinated permitting, clear decision-making authority, objective standards where practicable, feasibility/affordability/economic impact consideration, reduced duplication, and continuous improvement.

**Status key:** Fully addressed = framework substantially covers the concern; Mostly addressed = framework covers the issue well but exact wording may differ; Partially addressed = framework helps but targeted language may still be needed; Not addressed = separate substantive policy issue; N/A = already handled/technical/procedural.

#	Busi/Org	Name	Policy #	Topic	Requested action / concern summary	Framework assessment	Status	Targeted edit?
1	BP	Tamera Lienhart	Goal 1B and Policy 1B-5	Expanded tribal engagement	Clarify applicability by defining relevant county actions; apply mitigation only to significant adverse impacts.	Partially addressed	Clear authority/objective standards help, but specific definitions of relevant actions and significant impacts still need targeted text.	Yes
2	AltaGas	Andrea Doyle	2A-9 & 2A-10	Industrial zoning	Support deletion as approved via motion on Amendment #115.	N/A / already handled	This is a position on an already-approved deletion, not primarily addressed by the framework.	No
3	AltaGas	Andrea Doyle	2CC-??	Cherry Point UGA heavy industry	Approve language recognizing regulatory certainty for lawful existing facilities and distinguishing modernization from major expansion.	Not addressed	Framework supports certainty generally but does not create Cherry Point-specific modernization/capital investment protection.	Yes
4	AltaGas	Andrea Doyle	2CC-16	Tribal engagement in land use action	Support as currently amended and approved by COTW on 5/12/26.	N/A / already handled	Already supported as amended; framework is consistent but no separate targeted edit appears needed.	No
5	AltaGas	Andrea Doyle	New 2CC-19	Regulatory certainty for existing facilities	Approve Elenbaas #168 with minor language change regarding modernization and expansion thresholds.	Not addressed	Needs specific Cherry Point/existing-facility language beyond the broad implementation framework.	Yes
6	AltaGas	Andrea Doyle	New 2CC-20	Logistics infrastructure	Approve Elenbaas #169 with change recognizing not all Cherry Point industrial facilities are refineries.	Not addressed	Specific storage/logistics infrastructure language is not covered by the broad framework.	Yes
7	AltaGas	Andrea Doyle	New 2CC-21	Orderly energy transition	Approve Elenbaas #170 with change recognizing not all Cherry Point industrial facilities are refineries.	Not addressed	Specific processing/fuel handling capacity and environmental-benefit standard is separate substantive policy.	Yes
8	AltaGas	Andrea Doyle	New Policy 2?-?	Renewable energy accommodation	Approve Elenbaas amendments #171 and #172 as written.	Not addressed	Specific renewable/emerging energy accommodation is not created by the framework.	Yes
9	BP	Tamera Lienhart	2DD-2(E)	Climate-impacted natural hazard regulations	Replace adopt with evaluate; define partners.	Partially addressed	Objective standards/predictability help, but exact verb change and partner definition remain targeted edits.	Yes
10	AltaGas	Andrea Doyle	2M-3	Enhancement	Delete and enhance.	Not addressed	This is a specific deletion request about regulatory uncertainty from enhancement language.	Yes
11	AGC of WA	Lance Calloway	Policy 2A-8	Industrial land supply	Identify additional industrial sites prioritizing existing infrastructure, transportation access, and permitting feasibility.	Not addressed	Framework helps permitting but does not require industrial land inventory or site readiness.	Yes
12	AGC of WA	Lance Calloway	Policy 2A-9	Industrial / environmental justice	Use clear, objective, measurable EJ standards while ensuring viability and expansion of industrial uses.	Partially addressed	Objective standards and feasibility policies help, but the industrial-zone viability language may still need targeted text.	Maybe
13	AGC of WA	Lance Calloway	Policy 2C-7	Impact fees	Structure impact fees to avoid discouraging housing production or employment-generating development.	Partially addressed	Affordability/feasibility is covered generally; impact-fee-specific direction is not.	Maybe
14	AGC of WA	Lance Calloway	Policy 2D-11	Industrial disclosure	Disclosure of lawful maritime/industrial impacts should not impose additional permitting conditions beyond notice.	Partially addressed	Clear authority/predictability helps, but the disclosure-not-condition rule is specific.	Maybe

#	Busi/Org	Name	Policy #	Topic	Requested action / concern summary	Framework assessment	Status	Targeted edit?
15	AGC of WA	Lance Calloway	Goal 2H	Property rights and tribal rights	Preserve property rights while recognizing treaty rights and maintaining County decision-making authority.	Fully addressed	Clear decision-making authority and consultation-consistent-with-law language directly address this theme.	No
16	AGC of WA	Lance Calloway	Policy 2J-6	Siting of uses	Direct harmful uses away from health-disparity areas where feasible while maintaining adequate employment land supply.	Partially addressed	Feasibility and objective standards help, but employment-land supply language is substantive.	Maybe
17	AGC of WA	Lance Calloway	Policy 2J-8	Equitable investment	Prioritize underserved areas while maintaining competitiveness and avoiding disproportionate cost burdens.	Mostly addressed	Feasibility, economic opportunity, and cost-impact language substantially cover this.	No
18	AGC of WA	Lance Calloway	Policy 2J-9	Capital facilities equity	Use objective criteria and funding mechanisms that do not delay or preclude development.	Mostly addressed	Objective standards, predictability, and feasibility language substantially cover this.	No
19	AGC of WA	Lance Calloway	Policy 2J-11	Public participation expansion	Meaningfully involve affected people within defined predictable timelines.	Fully addressed	Predictable timelines, coordinated review, and meaningful participation are directly covered.	No
20	AGC of WA	Lance Calloway	Policy 2N-8	Industrial lands protection	Preserve industrial zoning and ensure shovel-ready, infrastructure-served industrial sites.	Partially addressed	Framework helps protect certainty but not industrial land inventory/readiness.	Yes
21	AGC of WA	Lance Calloway	Goal 2P	Urban density targets	Allow higher densities where infrastructure capacity exists or needed for housing targets.	Not addressed	Density targets and city capacity policy are substantive land-use issues.	Yes
22	AGC of WA	Lance Calloway	Policy 2CC-16	Tribal permit notification	Notice to tribes for coordination/consultation only; no tribal approval requirement.	Fully addressed	Clear authority and consultation-without-new-approval-authority language directly covers this.	No
23	BIAWC/WCAR	R. Perry Eskridge	Goal 3A	Housing permitting	Clarify components of permitting process requiring predictability; timelines, interpretation, outcomes, cost reduction.	Fully addressed	This is core framework language: predictable procedures, timelines, consistent interpretation, affordability/feasibility.	No
24	P66	Melina Ivie	Chapter 3 - Item 24	Cherry Point adjacency clarification	Clarify residential adjacency policy does not apply to Cherry Point UGA.	Not addressed	Specific Cherry Point applicability issue is outside the framework.	Yes
25	BIAWC/WCAR	R. Perry Eskridge	Policy 3A-1	UGA zoning/permitting coordination	Create separate policy coordinating County UGA zoning/regulations/permitting with neighboring municipalities.	Mostly addressed	Coordinated review with municipalities is covered, though exact annexation/UGA language could be added if desired.	Maybe
26	BIAWC/WCAR	R. Perry Eskridge	Policy 3A-3	Housing typo	Correct missing-word issue near International Building Codes.	N/A / technical correction	Not a policy-framework issue; handle as technical edit.	Yes
27	BIAWC/WCAR	R. Perry Eskridge	Policy 3D-5	Condominium legislation	Question whether legislative agenda item belongs; suggest WA Condominium Act amendments.	Not addressed	State legislative agenda/condominium law issue is outside framework.	Yes
28	WCAR	R. Perry Eskridge	Policy 3K-8	Fair housing duplication	Remove due to existing federal/state/REALTOR fair housing assessments/training/enforcement.	Partially addressed	Duplication policy helps, but removal of a specific fair-housing effort remains a targeted decision.	Maybe
29	BIAWC/WCAR	R. Perry Eskridge	Policy 3F-1	Development agreements	Specify concessions County accepts in exchange for affordability/community benefits.	Partially addressed	Feasibility is covered, but reciprocal concessions/vesting/fee relief need targeted language.	Yes
30	BIAWC/WCAR	R. Perry Eskridge	Policy 3J-3	Homeownership / tenant protection	Revise to focus on homeownership assistance and related programs.	Not addressed	Substantive housing policy issue, not implementation process.	Yes
31	BIAWC/WCAR	R. Perry Eskridge	Policy 3J-3	Tenant protections and rental costs	Revise tenant-protection language and consider affordability effects of renter regulation.	Partially addressed	Feasibility/cost language helps, but tenant-protection policy remains substantive.	Yes
32	BIAWC/WCAR	R. Perry Eskridge	Policy 3K-2	Tenant protections	Concerns about mandatory tenant protections and rental investment deterrence.	Partially addressed	Feasibility/cost language helps, but the requested policy revision/removal is not resolved.	Yes
33	WCAR	R. Perry Eskridge	Policy 3K-5	Shared decision-making	Clarify involvement does not add delays, costs, or legal challenges.	Fully addressed	Clear authority, avoiding duplication, and defined timelines directly address this concern.	No
34	WCAR	R. Perry Eskridge	Policy 3K-6	Racial covenant removal	Remove due to process already existing and incomplete nature of removal.	Not addressed	Specific legal/document-recording issue outside framework.	Yes
35	WCAR	R. Perry Eskridge	Policy 3K-7	Equity impact analysis	Revise/remove due to process, cost, scope, and delay concerns.	Partially addressed	Objective standards/proportionality/timelines help, but triggers, scope, and responsibility are unresolved.	Yes
36	AGC of WA	Lance Calloway	Goal 3K	Equity targets	Shared decision-making while maintaining clear authority and supporting production/growth.	Fully addressed	Clear authority plus housing/economic feasibility language directly addresses this.	No
37	AGC of WA	Lance Calloway	Housing Stability Section	Collaboration with tribes/partners	Maintain clear predictable permitting authority within County jurisdiction.	Fully addressed	Clear authority and predictable permitting directly cover this.	No

#	Busi/Org	Name	Policy #	Topic	Requested action / concern summary	Framework assessment	Status	Targeted edit?
38	AGC of WA	Lance Calloway	NEW Chapter-wide policy	Predictable permitting	Prioritize predictable, coordinated, time-bound permitting minimizing cost/delay.	Fully addressed	This is essentially the central framework concept.	No
39	AGC of WA	Lance Calloway	Policy 3A-1	Permitting efficiency	Simplify/modernize with defined timelines and accountability measures.	Fully addressed	Defined timelines, accountability, and continuous improvement directly cover this.	No
40	AGC of WA	Lance Calloway	Policy 3B-4	EJ / industrial proximity	Mitigate harms while maintaining land-use flexibility for industrial/employment uses.	Partially addressed	Feasibility/economic opportunity helps; industrial land-use flexibility may need targeted text.	Maybe
41	AGC of WA	Lance Calloway	Policy 3B-5	Industrial separation	Avoid/minimize housing near heavy industry while preserving industrial land/job-producing uses.	Partially addressed	Framework helps but does not set industrial-residential separation policy.	Maybe
42	AGC of WA	Lance Calloway	Policy 3C-9	UGA expansion	Include sites in UGA for affordable housing or adequate housing/economic capacity.	Not addressed	UGA expansion/capacity policy is substantive and separate.	Yes
43	AGC of WA	Lance Calloway	Policy 3D-1	Regional housing distribution	Ensure programs support feasible development and timely delivery.	Mostly addressed	Feasibility and timely project delivery are core framework themes.	No
44	AGC of WA	Lance Calloway	Policy 3F-1	Development agreements	Use incentives/negotiated measures maintaining feasibility and not deterring development.	Partially addressed	Feasibility is addressed; development agreement incentive mechanics remain targeted.	Maybe
45	AGC of WA	Lance Calloway	Policy 3G-6	Regulatory updates	Update/streamline codes while minimizing cost impacts and ensuring feasibility.	Fully addressed	Regulatory effectiveness, feasibility, and cost-impact language cover this well.	No
46	AGC of WA	Lance Calloway	Policy 3J-4	Equity distribution	Equitably distribute benefits while promoting growth, investment, and job creation.	Mostly addressed	Economic opportunity/job creation and feasibility language substantially cover this.	No
47	AGC of WA	Lance Calloway	Policy 3K-5	Shared decision-making	Preserve clear efficient permitting authority and avoid duplicative processes.	Fully addressed	Clear authority and avoid-duplication language directly cover this.	No
48	AGC of WA	Lance Calloway	Policy 3K-7	Equity impact analysis	Analysis/mitigation should be proportional, predictable, and not cause undue delay/cost.	Mostly addressed	Objective, proportional, predictable, cost-aware implementation covers much of this; details may still be refined.	Maybe
49	AGC of WA	Lance Calloway	Policy 3K-9	Tribal coordination	Consultative role consistent with law, no additional permitting/approval authority.	Fully addressed	Clear authority/consultation language directly covers this.	No
50	AltaGas	Andrea Doyle	5H-9	Renewable energy technology	Support regional/statewide utility-scale renewable projects.	Not addressed	Specific renewable energy support policy is not created by the implementation framework.	Yes
51	AltaGas	Andrea Doyle	New 5H-11	Responsible energy systems	Support reliable, affordable, resilient energy systems including renewable, low-carbon, transitional, emerging technologies.	Partially addressed	Framework supports feasibility and infrastructure investment generally, but energy-system policy remains targeted.	Maybe
52	AltaGas	Andrea Doyle	New 5H-14	Periodic updates	Periodically evaluate/update renewable and emerging energy regulations/procedures.	Mostly addressed	Continuous improvement/regulatory effectiveness covers the process; subject-specific energy language optional.	No
53	AGC of WA	Lance Calloway	Policy 5A-3	Corridor preference	Allow new corridors where necessary for industrial areas, UGAs, or major economic projects.	Not addressed	Specific utility-corridor siting flexibility is not covered.	Yes
54	AGC of WA	Lance Calloway	Policy 5A-7	Habitat protection	Allow necessary infrastructure with mitigation consistent with law.	Partially addressed	Objective/proportional standards help, but infrastructure exception language remains specific.	Maybe
55	AGC of WA	Lance Calloway	Policy 5D-1	Permitting	Defined timelines, consolidated review, priority processing for housing/industrial projects.	Fully addressed	Predictable, coordinated, time-bound permitting is central to the framework.	No
56	AGC of WA	Lance Calloway	Policy 5H-3	Tribal coordination	Defined review period; informs but does not supersede County authority.	Fully addressed	Clear authority and defined review process directly cover this.	No
57	AGC of WA	Lance Calloway	Policy 5JL-2	Economic benefit	Require utility proponent to show job/tax/infrastructure/economic sustainability benefits.	Partially addressed	Economic opportunity/infrastructure investment is addressed generally; utility benefit criteria are specific.	Maybe
58	AGC of WA	Lance Calloway	Policy 5LN-3	Pipelines in UGAs	Exception for industrial zones, employment lands, or critical regional energy infrastructure.	Not addressed	Specific pipeline siting exception not covered.	Yes
59	AGC of WA	Lance Calloway	Policy 5LN-7	500-ft pipeline restriction	Allow equivalent/improved safety mitigation based on engineering standards.	Not addressed	Specific safety/engineering exception not covered.	Yes
60	AGC of WA	Lance Calloway	Policy 5M / 5OR	Water availability	Allow phased infrastructure plan showing water secured before occupancy/use.	Not addressed	Water availability/phasing policy is separate.	Yes
61	AGC of WA	Lance Calloway	Policy 5N-6	Industrial water supply	Prioritize available water to industrial/employment lands supporting high-wage jobs.	Not addressed	Water allocation priority is substantive and not covered.	Yes

#	Busi/Org	Name	Policy #	Topic	Requested action / concern summary	Framework assessment	Status	Targeted edit?
62	AGC of WA	Lance Calloway	7A-11	Competitiveness review	Measurable targets for permit timelines, cost reduction, and approvals.	Fully addressed	Accountability, performance review, timelines, and cost reduction directly cover this.	No
63	AGC of WA	Lance Calloway	7A-14	Equity / economic impacts	Ensure equity policies do not reduce jobs, housing, tax base, or investment.	Mostly addressed	Feasibility/economic opportunity/housing supply language substantially covers this.	No
64	AGC of WA	Lance Calloway	7B-16	Construction apprenticeships	Remove due to existing RCW public works apprenticeship requirements.	Not addressed	Specific workforce mandate/removal issue outside framework.	Yes
65	AGC of WA	Lance Calloway	7B-17	Pre-apprenticeship equity	Use voluntary programs/incentives rather than private-development mandates.	Not addressed	Specific workforce mandate issue not covered.	Yes
66	AGC of WA	Lance Calloway	7C-4	Industrial areas	Prioritize designation, infrastructure funding, and pre-permitting of industrial areas including large parcels.	Not addressed	Industrial land readiness/infrastructure/pre-permitting policy is separate.	Yes
67	AGC of WA	Lance Calloway	7D-1	Tribal coordination	Defined consultation timelines, roles, dispute resolution, avoid duplicative approvals, maintain authority.	Fully addressed	Clear authority, coordination, timelines, and avoid duplication directly cover this.	No
68	AGC of WA	Lance Calloway	7D-9	Wetland mitigation bank	Develop countywide wetland mitigation bank to reduce timelines, uncertainty, and costs.	Not addressed	Specific mitigation bank program is not created by framework.	Yes
69	AGC of WA	Lance Calloway	7D-10 / 7D-11	Mitigation credits	Expand tools if they reduce permitting time, cost, and risk.	Partially addressed	Framework supports reducing time/cost/risk but not specific mitigation-credit tools.	Maybe
70	AGC of WA	Lance Calloway	7G-5	Coordination	Coordinate environmental/economic planning while ensuring timelines and clear permitting pathways.	Fully addressed	Directly covered by coordinated review, timelines, and clear pathways.	No
71	AGC of WA	Lance Calloway	7G-7	Job growth and land supply	Ensure adequate fully serviced shovel-ready permit-ready commercial/industrial land.	Not addressed	Land supply/readiness is substantive and needs targeted policy.	Yes
72	AGC of WA	Lance Calloway	7I-2	Equity and inclusion	Use workforce/training/access programs without extra regulatory conditions/mandates/costs on private development.	Partially addressed	Cost/feasibility language helps; specific no-new-mandates language may need targeted text.	Maybe
73	BP	Tamera Lienhart	8Q-6	Sediment removal	Delete prohibition on sediment removal that harms resources/treaty rights.	Not addressed	Specific river/sediment management standard is not covered.	Yes
74	BP	Tamera Lienhart	Ch. 8 / Goal 8V / Policy 8V-4	Treaty rights framing	Delete/revise language elevating tribal treaty rights above all else.	Partially addressed	Clear authority/legal consistency helps, but exact legal framing remains targeted.	Yes
75	AGC of WA	Lance Calloway	Goal 8F	Water rights	Balance treaty/senior water rights, agriculture, residents, and predictable permitting for economic development/infrastructure.	Partially addressed	Predictable permitting/economic feasibility helps, but water-rights balancing is substantive.	Yes
76	AGC of WA	Lance Calloway	Policy 8I / Forest & Marine Coordination	Tribal coordination	Consultative capacity consistent with law; no additional approvals beyond existing frameworks.	Fully addressed	Clear authority/consultation-consistent-with-law language directly covers this.	No
77	AGC of WA	Lance Calloway	Policy 8A-2	Ag land protection	Allow strategic limited conversion for housing/jobs/economic development consistent with GMA.	Not addressed	Agricultural land conversion policy is substantive.	Yes
78	AGC of WA	Lance Calloway	Policy 8A-15	Ag mitigation for UGA expansion	Scale mitigation to impact and avoid prohibitive costs for affordability/economic feasibility.	Partially addressed	Feasibility and cost impact help, but specific ag-mitigation scaling remains targeted.	Maybe
79	AGC of WA	Lance Calloway	Policy 8D-10	Development clustering	Allow flexibility where needed for viable development, infrastructure efficiency, or housing supply.	Not addressed	Specific clustering standard/flexibility is not covered.	Yes
80	AGC of WA	Lance Calloway	Policy 8E	Ag/tribal/wildlife coordination	Seek clear, timely, cost-effective permitting outcomes supporting environment and economic viability.	Fully addressed	Predictable, coordinated, efficient, feasibility-aware permitting directly covers this.	No
81	AGC of WA	Lance Calloway	Policy 8U-1	Marine regulation	Improve predictability while minimizing duplication, delay, and cost for marine development.	Fully addressed	Predictability/duplication/cost-delay framework directly covers this.	No
82	AGC of WA	Lance Calloway	Policy 8C-5	Equity investments	Support equity investments while also supporting jobs/workforce/economic growth.	Mostly addressed	Economic opportunity/job creation and balanced implementation cover this.	No
83	AGC of WA	Lance Calloway	Policy 8G-12	Forestry jobs	Support forestry and value-added industrial/manufacturing diversification.	Not addressed	Specific forestry/industrial diversification policy outside framework.	Yes
84	AGC of WA	Lance Calloway	General permitting language	Permitting across policies	Add global streamlined/coordinated permitting with clear timelines to avoid delay/cost.	Fully addressed	This is the central purpose of the framework.	No
85	BP	Tamera Lienhart	9A-13	Tribal resources definition	Align tribal resources definition with existing state/federal terminology.	Partially addressed	Objective/legal-consistency concepts help, but definition still needs targeted edit.	Yes

#	Busi/Org	Name	Policy #	Topic	Requested action / concern summary	Framework assessment	Status	Targeted edit?
86	BP	Tamera Lienhart	10C-6	Purpose of regulations	Delete/revise policy improperly constraining land-use regulation purposes.	Partially addressed	Framework balances implementation factors but does not fix exact GMA/legal drafting issue.	Yes
87	BP	Tamera Lienhart	10F-6	Watershed planning jurisdiction	Add qualifier: when not in conflict with state/federal permits.	Partially addressed	Clear authority/legal consistency helps, but specific qualifier remains targeted.	Yes
88	BP	Tamera Lienhart	10H-8	Stormwater/drainage jurisdiction	Add qualifier: when not in conflict with state/federal permits.	Partially addressed	Same as #87; specific qualifier remains targeted.	Yes
89	BP	Tamera Lienhart	10K-12	Shoreline standards outside Ch. 11	Remove marine shorelines to avoid duplication/inconsistency with Ch. 11.	Partially addressed	Avoid-duplication policy helps, but specific text removal remains targeted.	Yes
90	P66	Melina Ivie	10K-8	Critical areas / shoreline siting	County approved correction but motion has not been made.	N/A / technical pending	Specific correction already approved but procedurally pending; not a framework issue.	Yes
91	BP	Tamera Lienhart	10L-5	Shoreline standards outside Ch. 11	Remove last sentence/avoid SMP conflict regarding vegetated riparian areas.	Partially addressed	Avoid-duplication/legal consistency helps, but targeted text removal remains.	Yes
92	P66	Melina Ivie	10L-5	Native vegetation / shorelines	County approved correction but motion has not been made.	N/A / technical pending	Specific correction already approved but procedurally pending; not a framework issue.	Yes
93	BP	Tamera Lienhart	10L-6	Shoreline armoring	Remove sentence restricting hard armoring outside Ch. 11.	Partially addressed	Avoid-duplication/legal consistency helps, but specific removal remains targeted.	Yes
94	BP	Tamera Lienhart	10N-4	Kelp/eelgrass conservation	Remove policy as duplicative/conflicting with state/federal permitting.	Partially addressed	Avoid-duplication/legal consistency helps, but removal decision remains targeted.	Yes
95	BP	Tamera Lienhart	10N-9	Contaminant testing	Remove policy; County lacks authority/capacity and duplicates existing law.	Partially addressed	Clear authority/legal consistency helps, but specific removal remains targeted.	Yes
96	AltaGas	Andrea Doyle	Policy 10B-7	Environmental conservation	Remove unclear regulatory backstop/regulatory consequences language.	Partially addressed	Objective standards and performance metrics help, but exact unclear language may need removal/rewrite.	Yes
97	AltaGas	Andrea Doyle	Policy 10E-8	Climate hazards	Remove due to unclear locations/standards and regulatory uncertainty.	Partially addressed	Objective standards/predictability help, but hazard mapping/standards issue remains.	Yes
98	AltaGas	Andrea Doyle	Policy 10H-10	Critical areas	Restore no net loss language instead of undefined net gain standard.	Not addressed	Specific ecological-function standard must be decided directly.	Yes
99	AGC of WA	Lance Calloway	Policy 10A-8	Tribal coordination	Defined consultation process/timelines; no additional approval authority unless statute provides.	Fully addressed	Clear authority and defined consultation process directly cover this.	No
100	AGC of WA	Lance Calloway	Policy 10B-5	Permitting process	Process permits within established timeframe with maximum review timelines and coordinated interagency review.	Fully addressed	Time-bound coordinated permitting directly covers this.	No
101	AGC of WA	Lance Calloway	Policy 10B-7	Regulatory backstop	Use backstop only after documented data-driven determination, public review, and metrics.	Partially addressed	Objective standards/performance metrics help, but specific backstop preconditions remain targeted.	Maybe
102	AGC of WA	Lance Calloway	Policy 10C-2	Economic parameters	Consider job creation, wages, industrial land, tax base with documented analysis for major regulatory changes.	Mostly addressed	Economic feasibility/opportunity language substantially addresses this; documented-analysis trigger could be targeted.	Maybe
103	AGC of WA	Lance Calloway	Policy 10C-5	Environmental justice	Avoid disproportionate impacts while not reducing housing, jobs, or competitiveness.	Mostly addressed	Balanced feasibility, housing supply, and economic opportunity language substantially cover this.	No
104	AGC of WA	Lance Calloway	Policy 10E-1	Hazard areas	Allow development where mitigation reduces risk to acceptable levels while considering housing/economic needs.	Partially addressed	Objective/feasibility language helps; hazard-area mitigation standard remains specific.	Maybe
105	AGC of WA	Lance Calloway	Policy 10J-9	Lake Whatcom phosphorus	Allow credit trading/mitigation banking/off-site mitigation for equivalent outcomes.	Not addressed	Specific compliance flexibility tools are not included in framework.	Yes
106	AGC of WA	Lance Calloway	Policy 10K-8	Habitat siting	Discourage development only where impacts cannot be mitigated to clear BAS-based thresholds.	Partially addressed	Objective standards language helps; BAS threshold/mitigation standard may need targeted text.	Maybe
107	AGC of WA	Lance Calloway	Policy 10M-3	Wetlands economic impact	Evaluate impacts to employment, industrial capacity, affordability, and tax revenue.	Mostly addressed	Framework's feasibility/economic impacts language substantially covers this.	No

#	Busi/Org	Name	Policy #	Topic	Requested action / concern summary	Framework assessment	Status	Targeted edit?
108	BP	Tamera Lienhart	12-E-5	Conversion discouragement	Remove policy discouraging conversion of wetlands, critical areas, riparian areas, estuaries.	Partially addressed	Avoid-duplication/legal consistency helps, but specific removal remains targeted.	Yes

## Summary of Items Requiring Additional Attention

Fully addressed: 23

Mostly addressed: 12

Partially addressed: 38

Not addressed: 30

N/A / already handled: 2

N/A / technical correction: 1

N/A / technical pending: 2

Items marked Targeted edit = Yes:

1, 3, 5, 6, 7, 8, 9, 10, 11, 20, 21, 24, 26, 27, 29, 30, 31, 32, 34, 35, 42, 50, 53, 58, 59, 60, 61, 64, 65, 66, 68, 71, 73, 74, 75, 77, 79, 83, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 105, 108