

**WHATCOM COUNTY
PUBLIC WORKS DEPARTMENT**

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NATURAL RESOURCES

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MEMORANDUM

TO: Whatcom County Council
Whatcom County Planning Commission

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

FROM: Gary Stoyka, Natural Resources Manager *gs*
Lauren Clemens, Climate Action Manager

DATE: August 6th, 2025

RE: **2025 Comprehensive Plan- Climate Element (Chapter 12)**

The Washington State Growth Management Act (GMA) requires Whatcom County to review and revise its comprehensive plan and development regulations by December 31, 2025 (RCW 36.70A.130). Whatcom County is in the process of a multi-year effort to update its Comprehensive Plan and development regulations to meet new GMA requirements. There are two significant changes in GMA that affect the 2025 update, including GMA changes regarding housing (HB 1220) and climate change (HB 1181).

Legislation signed into law in 2023 (HB 1181) added a climate goal to the GMA and requires that local comprehensive plans add a climate element. Climate elements must maximize economic, environmental, and social co-benefits and prioritize environmental justice to avoid worsening environmental health disparities. A climate element can take the form of a single comprehensive plan chapter or be integrated into several elements (chapters), such as housing, transportation, and land use. Cities and counties with a 2025 comprehensive plan periodic update deadline will be the first jurisdictions required to have a climate element and are required to follow the Washington State Department of Commerce "intermediate" climate planning guidance.

Whatcom County Planning and Development Services Department (PDS) is in the process of conducting public hearings and work sessions for Comprehensive Plan chapters with the Whatcom County Planning Commission. After reviewing each individual chapter and supporting documentation, the Planning Commission will make recommendations to the County Council.

The Whatcom County Council of the Whole will hold a joint meeting with the Planning Commission to discuss Comprehensive Plan Chapter 12 (Climate) on August 6th, 2025.

Whatcom County Climate Action Manager will introduce the chapter to Council and Planning Commission.

Chapter 12- Climate includes a greenhouse gas reduction and resilience subelement with goals and policies across two sub-elements and all eleven recommended sectors to meet the Washington Department of Commerce intermediate guidance requirements for fully planning jurisdictions.

County Climate Planning Requirements- Greenhouse Gas Emissions and Resilience Subelements (from Commerce Periodic Update Checklist for Fully-Planning Counties)

Greenhouse Gas Emissions Subelement

- ☐ Greenhouse gas emissions reduction sub-elements must include goals and policies to reduce emissions and per capita vehicle miles traveled. RCW 36.70A.070(9)- new in 2023.
 - ☐ Note: Commerce recommends that jurisdictions use 2022 as a baseline year for their GHG inventories and set incremental targets that lead to achieving Washington's economy-wide target of net zero emissions in 2050 set forth in RCW 70A.45.020(1). Commerce also recommends that jurisdictions should, at a minimum, include goals and policies within the following sectors: Transportation; Buildings & Energy; and, Zoning & Development.
- ☐ Identified actions that the jurisdiction will take during the planning cycle that will result in reductions in overall GHG emissions generated by transportation within the jurisdiction. RCW 36.70A.070(9)- new in 2023.
- ☐ Identified actions that the jurisdiction will take during the planning cycle that will result in reductions in overall GHG emissions generated by land use within the jurisdiction. RCW 36.70A.070(9)- new in 2023.
- ☐ Identified actions that the jurisdiction will take during the planning cycle that will result in reductions in per capita vehicle miles traveled (VMT) within the jurisdiction. RCW 36.70A.070(9)- new in 2023.
- ☐ Prioritize GHG and VMT reductions that benefit overburdened communities in order to maximize the co-benefits of reduced air pollution and environmental justice. RCW 36.70A.070(9)- new in 2023.

Resilience Subelement

- ☐ Specific goals, policies and programs that identify, protect, and enhance natural areas to foster resilience to climate impacts, as well as areas of vital habitat for safe passage and species migration. RCW 36.70A.070(9)- new in 2023.
- ☐ Specific goals, policies and programs that identify, protect, and enhance community resilience to climate change impacts, including social, economic, and built environment factors that support adaptation to climate impacts consistent with environmental justice. RCW 36.70A.070(9)- new in 2023.
- ☐ Specific goals, policies and programs that address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire and other effects of changes to temperature and precipitation patterns. RCW 36.70A.070(9)- new in 2023.

- Prioritize actions that benefit overburdened communities that will disproportionately suffer from compounding environmental impacts and will be most impacted by natural hazards due to climate change. RCW 36.70A.070(9)- new in 2023.

Greenhouse Gas Emissions Subelement

Minimum Requirements for Developing a GHG Emissions Reduction Sub-element:

HB 1181 requires that a county's GHG reduction sub-element and its related development regulations must identify the actions the jurisdiction will take during the planning cycle that will:

- Requirement 1: Result in reductions in overall greenhouse gas emissions generated by transportation and land use within the jurisdiction, but without increasing emissions elsewhere in Washington.
- Requirement 2: Result in reductions in per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in Washington.
- Requirement 3: Prioritize reductions that benefit overburdened communities in order to maximize the co-benefits of reduced air pollution and environmental justice.

Pathway 3- Conduct a Greenhouse Gas Emissions Inventory:

All jurisdictions required to create a Greenhouse Gas Reduction sub-element must follow guidance pathway 3, "Create a Greenhouse Gas Emissions Inventory." The goals and policies in the Greenhouse Gas Subelement are based on the emissions inventory, trends, and forecasting reports that provide technical documentation of pathways to achieve countywide net-zero emissions by 2050. "Net-zero" is defined as when greenhouse gases emitted are reduced to near-zero, and the limited remaining greenhouse gases which cannot be eliminated are mitigated with carbon dioxide sequestration to bring the total net emissions to zero. Washington state has adopted a net-zero emissions reduction target that corresponds to reducing greenhouse gas emissions to 95% of 1990 levels by 2050 (see: 365-196-200 WAC draft rulemaking).

Washington's fully planning jurisdictions are directed by Commerce to measure and reduce local greenhouse gas emissions and per capita vehicle miles traveled (vehicle miles travelled) within the jurisdiction via comprehensive plan goals and policies. The sub-element was developed with an overall target to support the state's net-zero emissions target by 2050. When Whatcom County is tracking progress, this emissions target will be measured on a total and per capita basis so that progress is not masked by population growth, per Commerce guidance. Greenhouse gas reduction measures are required, at a minimum, include goals and policies within the Transportation, Buildings & Energy, and Zoning & Development sectors. Supporting goals and policies will also be included within the Land Use, Utilities, and Transportation Chapters of the Comprehensive Plan.

The 2022 Whatcom County Greenhouse Gas Emissions Inventory provides the underlying data to understand the emissions sources and includes both "core emissions," emissions that a County government has more influence through local codes and regulations and "total emissions," which includes a wider range of emissions countywide, including those over which county government may have limited direct influence. Emissions from government operations account for a total of 9,390 MTCO₂e or 0.11% of the countywide total and "core emissions" representing 23.6% of emissions countywide.

WHATCOM COUNTY CORE EMISSIONS SUMMARY- 1,916,847 MTCO₂e

Activity Type	Core Emissions (MTCO ₂ e)	Percent of Total (%)
Built Environment	1,073,535	56%
Transportation & Other Mobile Sources	738,587	39%
Solid Waste & Wastewater	104,726	5%
TOTAL	1,916,847	100%

Source: 2022 Whatcom County Greenhouse Gas Inventory

WHATCOM COUNTY TOTAL EMISSIONS SUMMARY- 8,121,734 MTCO₂e

Activity Type	Core Emissions (MTCO ₂ e)	Percent of Total (%)
Built Environment	5,357,149	66%
Transportation & Other Mobile Sources	1,124,979	14%
Solid Waste & Wastewater	104,726	1%
Refrigerants	126,483	2%
Land Use	1,408,396	17%
TOTAL	8,121,734	100%

Source: 2022 Whatcom County Greenhouse Gas Inventory

For more detailed analysis, please see the Whatcom County 2022 Greenhouse Gas Inventory, Whatcom County 2017-2022 Greenhouse Gas Emissions Trends Report, and Whatcom County Greenhouse Gas Emissions Forecasting Report.

Resilience Subelement**Minimum Requirements for Developing a Resilience Sub-element-**

HB 1181 requires that a county's resilience reduction sub-element and its related development regulations must identify the actions the jurisdiction will take during the planning cycle that will:

- Requirement 1: Address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire, and other effects of changes to temperature and precipitation patterns.
- Requirement 2: Identify, protect, and enhance natural areas to foster climate resilience, as well as areas of vital habitat for safe species migration.
- Requirement 3: Identify, protect, and enhance community resilience to climate impacts, including social, economic, and built-environment factors, which support adaptation to climate impacts consistent with environmental justice.

Pathway 2- Develop New Goals and Policies

The resilience goals and policies developed by a jurisdiction must be based on best available science to assess climate impacts, environmental justice considerations, and local planning context and needs. Commerce provides the following criteria to develop consistency with the state climate planning law, which includes goals and policies that equitably enhance community resilience, are consistent with best available science and scientifically credible climate projections

and impact scenarios, and prioritize and benefit overburdened communities that may suffer disproportionately from climate hazards and impacts. To provide an evaluation of climate projections and impacts, Whatcom County completed the Climate Hazard and Risk Assessment in June 2025 to prioritize and tailor measures and build on the identified gaps and opportunities noted in the Whatcom County the 2024 Natural Hazard Mitigation Plan Audit.

Exposure to climate impacts and vulnerable populations are not evenly distributed across the County. Analysis conducted as part of the Climate Hazard and Impact Assessment provides background information to assist policymakers prioritize policy approaches and focus adaptation efforts in support of adopting land use strategies that mitigate risks. As part of the Climate Hazards and Impact Assessment, Whatcom County conducted a parcel analysis to evaluate the spatial distribution of climate impacts in Whatcom County that met certain exposure thresholds. This analysis provides a framework to assess hazard extent, identify vulnerable communities, and inform potential planning and zoning actions towards areas at greatest risk. Maps that document best available science to reflect projected near-term risk are also included for priority hazards as part of the element.

WHATCOM COUNTY CLIMATE HAZARD PARCEL ANALYSIS

Hazard Layer	Total Tax Parcels Intersected	# of Tax Parcels in Unincorporated Whatcom County	# of Tax Parcels by UGA/ cities
Erosion	2,883	2,747	136
Sea Level Rise	7,347	6,634	713
Flooding	23,521	16,656	6,865
Landslide Hazard	3,029	3,029	0
Alluvial Fans	4,290	4,248	42

Source: 2025 Whatcom County Climate Hazard and Impact Assessment

Draft Climate Element- Discussion

The climate policies identified as examples in the Commerce intermediate guidance represent many possible implementation approaches, including implementation through regulatory, programmatic, educational, technical assistance, and capital investment mechanisms. Washington Department of Commerce guidance provides jurisdictions with flexibility to customize policies and set policies and goals that are relevant and appropriate to Whatcom County. Some proposed policies were included to address Whatcom County Council Priorities as identified in Resolution 2022-036 and others are proposed to support priorities identified in the Whatcom County Climate Action Plan. Washington State Department of Commerce will consider policies consistent with the intermediate guidance if the policies are measurable and supported by scientifically credible projections and scenarios that indicate their adoption is likely to result in reductions of greenhouse emissions or reduce the severity of a hazard's projected climate impact.

For an overall checklist of requirements for the chapter, see the County Fully Planning checklist cited above or visit: commerce.wa.gov/growth-management/gma-topics/periodic-update/.

Other considerations for policy prioritization may include the following framing questions:

- **Effectiveness-** Will the policy reduce the severity of the hazard's projected climate impacts? Does the policy have a demonstrated ability to reduce greenhouse gas emissions?
- **Unintended Impacts-** Will implementing the policy result in unintended social, economic, or environmental impacts?
- **Authority-** Does Whatcom County have the authority to implement the policy or influence the outcome through partnerships?
- **Internal Consistency-** Does the proposed policy conflict with or create barriers to implementing other policies in the Comprehensive Plan?
- **External Consistency-** Is the proposed policy consistent with the countywide planning policies and other Growth Management Act requirements?

Climate Element Development Process Overview-

HB 1181 was enacted in July 2023 and amended the Growth Management Act to plan for climate change. As a fully planning 2025 jurisdiction, Whatcom County is subject to the intermediate guidance from the Department of Commerce which was issued in January 2024. The Climate Impact Advisory Committee issued some initial policy direction for the Comprehensive Plan update in March 2024. The first public draft of the climate element for review and comment from Whatcom County advisory committees was issued in January 2025 with comments submitted by March. Documentation of how comments were incorporated from the advisory committee to the Planning Commission drafts is included as the summary of comments matrix.

- July 2023- HB 1181 enacted into law and amended the Growth Management Act to require incorporation of climate planning into the Comprehensive Planning process
- December 2023- Washington Department of Commerce issues intermediate planning guidance
- March 2024- Climate Impact Advisory Committee- Initial policy direction for Comprehensive Plan update (Committee Recommendation)
- June- September 2024- Staff audits of climate plans and policies, including the 2021 Whatcom County Climate Action Plan
- October 2024- Climate Impact Advisory Committee- Staff briefing on HB 1181 and climate planning, initial review of draft greenhouse gas emissions draft inventory
- November 2024- Completion of Natural Hazard Mitigation Plan Audit (to support resilience subelement)
- January 2025- Advisory committee draft of Climate Element introduced at Climate Impact Advisory Committee
- January- March 2025- Advisory Committee review- development of CIAC recommended revisions on Climate Element, full approved revisions passed in March 2025
- April 2025- Staff briefing on climate planning requirements for Comprehensive Plan Update at Whatcom County Council of the Whole

- May 2025- Staff Briefing with Whatcom County Planning Commission to review climate element and HB 1181 requirements
- June 2025- Technical consultant presentation of Climate Hazard and Impact Assessment and Greenhouse Gas Emissions Modelling (to support greenhouse gas emissions subelement and resilience subelement)
- July 2025- Interdepartmental review of Climate Element
- August 2025- Whatcom County Council of the Whole- Planning Commission joint work session- Climate Element

Attachments:

- 1. Whatcom County Climate Element- County Council- Planning Commission Draft (August 2025)
- 2. Draft- Appendix A Glossary- Climate
- 3. Summary- Comment and Revision Summary Matrix – August 2025

Supporting Documentation for Council- Planning Commission Meeting:

- 4. Washington Department of Commerce- Intermediate Planning Guidance
- 5. 2022 Whatcom County Greenhouse Gas Inventory Report
- 6. Whatcom County Greenhouse Gas Emissions Trends & Projections Reports
- 7. 2025 Climate Hazard and Impact Assessment
- 8. Public Engagement Memo- Climate (March 2025)